

INFO TECH n. 15/2018  
Dipartimento Tecnico – 19 ottobre 2018

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### EASA FTL- INFLIGHT REST FOR FLIGHT CREW

Gentili colleghi,  
di recente il Dipartimento Tecnico è stato interessato da alcuni nostri membri circa un problema di normativa FTL riguardo alla regola di svolgimento del riposo a bordo su aeromobili non equipaggiati di posto di riposo di class 1 (i lettini per capirci), quando ad esempio su alcuni voli per esigenze legate all’FDP viene utilizzato un equipaggio rinforzato a cui si aggiunge un pilota in addestramento.

Da rimarcare che nell’iniziale studio dell’EASA in materia di riposo a bordo l’utilizzo di posti passeggeri di classe economica per il riposo dell’equipaggio non era prevista.

Per i vari rappresentanti presso l’EASA tra cui l’ECA (a cui ANPAC appartiene) e le varie rappresentanze del Flight Crew/Cabin Crew europee era e rimane incomprensibile la logica di fare economie su un aspetto che ha impatti sulla sicurezza volo come il riposo a bordo. Mai ci si aspettava che gli operatori potessero utilizzare aeromobili senza posti di riposo di Class 1 al massimo di Class 2 per operazioni di lungo raggio nei quali la lunghezza dell’FDP richiede un adeguato riposo dei Crew member.

Le cose sono andati diversamente ed aeromobili inizialmente configurati per voli senza estensione di FDP sono poi stati adattati ai voli più lunghi e l’EASA si è vista costretta a rivedere l’iniziale impostazione della norma considerando anche posti di Class 3 e rivedendo questa parte della normativa nel suo insieme.

Per ANPAC rimane inconcepibile che gli operatori possano continuare su questa strada e ci batteremo affinché nelle future configurazioni degli aa/mm di lungo raggio ci siano sempre posti di riposo di Class 1

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A questo punto riteniamo necessario la pubblicazione della presente Info Tech per chiarire questo punto della normativa FTL Easa ed offrire una pratica guida sull'argomento.

## Normativa FTL e definizioni

Trattandosi di norme per questo paragrafo preferiamo mantenere la citazione ed il riporto nella lingua inglese esattamente come pubblicato dall'EASA al fine di evitare ogni possibile traduzione errata o doppio senso.

### ORO.FTL.105 Definitions

(5) **"augmented flight crew"** means a flight crew which comprises more than the minimum number required to operate the aircraft, allowing each flight crew member to leave the assigned post, for the purpose of in-flight rest, and to be replaced by another appropriately qualified flight crew member;

(12) **"flight duty period (FDP)"** means a period that commences when a crew member is required to report for duty, which includes a sector or a series of sectors, and finishes when the aircraft finally comes to rest and the engines are shut down, at the end of the last sector on which the crew member acts as an operating crew member;

(13) **"flight time"** means, for aeroplanes and touring motor gliders, the time between an aircraft first moving from its parking place for the purpose of taking off until it comes to rest on the designated parking position and all engines or propellers are shut down;

(19) **"rest facility"** means a bunk or seat with leg and foot support suitable for crew members' sleeping on board an aircraft;

In-flight rest facilities in accordance with ORO.FTL.205 (e)(iii) fulfil the following minimum standards:

- **Class 1 rest facility** means a bunk or other surface that allows for a flat or near flat sleeping position. It reclines to at least 80° back angle to the vertical and is located separately from both the flight crew compartment and the passenger cabin in an area that allows the crew member to control light, and provides isolation from noise and disturbance;
- **Class 2 rest facility** means a seat in an aircraft cabin that reclines at least 45° back angle to the vertical, has at least a pitch of 55 inches (137.5 cm), a seat width of at least 20 inches (50 cm) and provides leg and foot support. It is separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is reasonably free from disturbance by passengers or crew members;
- **Class 3 rest facility** means a seat in an aircraft cabin or flight crew

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compartment that reclines at least 40° from the vertical, provides leg and foot support and is separated from passengers by at least a curtain to provide darkness and some sound mitigation, and is not adjacent to any seat occupied by passengers.

(17) “**operating crew member**” means a crew member carrying out duties in an aircraft during a sector;

GM1 ORO.FTL.105 (17) OPERATING CREW MEMBER

A person on board an aircraft is either a crewmember or a passenger. If a crewmember is not a passenger on board an aircraft, he/she should be considered as ‘carrying out duties’. **The crewmember remains an operating crewmember during in-flight rest. In-flight rest counts in full as FDP, and for the purpose of ORO.FTL.210.**

(1) **The extension of FDP with in-flight rest under the provisions of ORO.FTL.205 (e) complies with the following:**

(i) the FDP is limited to 3 sectors; and

(ii) **the minimum in-flight rest period is a consecutive 90-minute period for each crew member and 2 consecutive hours for the flight crew members at control during landing.**

GM1 CS FTL.1.205(c)(1)(ii)

IN-FLIGHT REST

In-flight rest should be taken during the cruise phase of the flight.

GM2 CS FTL.1.205(c)(1)(ii)

IN-FLIGHT REST

In-flight rest periods should be allocated in order to optimise the alertness of those flight crew members at control during landing.

(2) The maximum daily FDP under the provisions of ORO.FTL.205 (e) may be extended due to in-flight rest for flight crew:

(i) with one additional flight crew member:

(A) up to 14 hours with class 3 rest facilities;

(B) up to 15 hours with class 2 rest facilities; or

(C) up to 16 hours with class 1 rest facilities;

(ii) with two additional flight crew members:

(A) up to 15 hours with class 3 rest facilities;

(B) up to 16 hours with class 2 rest facilities; or

(C) up to 17 hours with class 1 rest facilities.

## Esempi pratici nell’applicazione delle suddette norme e definizioni

### Caso di aeromobili equipaggiati con posti di Class 1

E’ il caso più semplice da rappresentare in quanto di solito ci sono 2 lettini.

**Nella condizione con 3 CM**

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Saranno organizzati 3 o più turni di riposo facendo attenzione che i due CM ai comandi di volo durante l'atterraggio possano usufruire di un turno di riposo di almeno 2 ore continuative, mentre il terzo CM dovrà usufruire di almeno 90 minuti di riposo.

### **Nella condizione con 4 CM**

Valgono le sopradette considerazioni sui tempi con la variante che essendo 4 CM a bordo 2 ed essendo disponibili 2 lettini, 2 CM possono andare a riposare insieme, facendo 2 o più turni. Da rimarcare che nell'organizzazione di più turni la regola delle 2 ore e dei 90 minuti ininterrotti va rispettata.

### **Nota**

Nel caso di indisponibilità di uno dei due lettini (ad esempio perché U/S ed inserito nelle MEL) i turni dei quattro CM ovviamente non si accoppiano e si ruoterebbe in 4 sullo stesso lettino, rispettando i tempi minimi.

### **Caso di aeromobili equipaggiati con posti di Class 2**

Se l'operatore mette a disposizione 2 posti di Class 2 valgono le stesse considerazioni fatte per I Class1.

Se invece viene messo a disposizione **un solo posto** allora si ruota in 3 o in 4 sullo stesso posto sempre rispettando per i turni le limitazioni imposte dalla normativa che ribadiamo:

- 2 ore per i piloti ai comandi durante l'atterraggio
- 90 minuti per gli altri

### **Nota 1**

L'eventuale CM aggiunto in addestramento ha diritto, dovere e obbligo dello stesso riposo previsto dalla normativa. In particolare se ai comandi di volo in atterraggio deve avere 2 ore di riposo minimo non interrotto esattamente come se fosse un CM dell'equipaggio minimo richiesto.

### **Nota 2**

Poiché secondo la già citata GM1 CS FTL.1.205(c)(1)(ii) l'inflight rest va effettuato nella fase di crociera. Si potrebbero verificare situazioni in cui il numero dei CM a bordo e la lunghezza del tempo di volo in crociera non consente di usufruire del riposo minimo stabilito, in questi casi (che ci risultano rari) è dovere e responsabilità del Pilot In Command ricercare delle soluzioni compatibili prima della partenza del volo, esempio:

- Se possibile far approntare un secondo posto di riposo (nel caso di 4 CM)
- Utilizzare altra tipologia di riposo (es. eventuali class 2 a bordo disponibili) se si rientra nel massimo FDP previsto)

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### Nota 3

La definizione di "Inflight rest" non implica necessariamente che il CM debba dormire, può anche riposare senza fase di sonno nel posto di riposo.

### Nota 4

I tempi minimi di riposo (rispettivamente di 2 ore e 90 minuti) sono continuativi e senza interruzioni ed eventuali tempi di cambio turni (esempio i classici 10 minuti della sveglia) tra i CM non devono essere considerati

### Registrazione dei tempi di riposo

Ricordiamo che la modalità di estensione dell'FDP con l'Inflight Rest rende obbligatorio tenere traccia dei tempi di riposo di tutti i CM in caso di future contestazioni da parte dell'Autorità oppure in caso di investigazione safety, pertanto è richiesto di registrarli (ad esempio sull'OFP)

### [ANPAC - Dipartimento Tecnico](#)

Per ogni osservazione o feedback è gradita un'email a: [dt@anpac.it](mailto:dt@anpac.it)

## **EASA FTL- INFLIGHT REST FOR FLIGHT CREW**

Dear Members,

recently the Technical Department has been concerned by some of our members about a problem of FTL regarding the rule of carrying out INFLIGHT REST on board on aircraft not equipped with a class 1 rest facilities, when for example on some flights for FDP-related needs, a augmented crew is used, plus a pilot in training.

It should be noted that in the initial EASA study of inflight rest the use of economy class passenger seats for crew was not foreseen.

For the various representatives at the EASA including the ECA (to which ANPAC belongs) and the various representatives of the European Flight Crew / Cabin Crew it was and remains incomprehensible the logic of saving on an aspect that has an impact on flight safety as the crew inflight rest. It was never expected that operators could use aircraft without Class 1 at most Class 2 facilities for long-range operations where the length of the FDP requires an adequate rest of the Crew members.

The story went differently and aircraft initially configured for flights without FDP extension were then adapted to longer flights and EASA was forced to revise the initial setting of the standard considering also Class 3 seats and revising this part of the legislation as a whole.

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For ANPAC it remains inconceivable that the operators can continue on this path and we will fight so that in future configurations of the long-range aircraft there are always Class 1 rest places.

At this point we consider it necessary to publish this Info Tech to clarify this point of FTL Easa and offer a practical guide on the subject.

## FTL regulation and definitions

Being the norms born officially in English we preferred to keep the quote and the report in English exactly as published by EASA in order to avoid any possible wrong translation or double meaning.

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## Practical examples in the application of the aforementioned rules and definitions

### **Case of aircraft equipped with Class 1 seats**

It is the simplest case to represent, as there are usually 2 beds.

In the condition with 3 CM

3 or more rest periods will be organized, making sure that the two CMs at the flight controls during the landing can take advantage of a rest slot of at least 2 continuous hours, while the third CM must take at least 90 minutes of rest.

In the condition with 4 CM

The aforementioned time considerations are valid with the variant being 4 CM on board 2 and 2 beds are available, 2 CM can go to rest together, doing 2 or more periods. It should be noted that in the organization of several slot, the rule of the 2 hours and 90 minutes uninterrupted must be respected.

### **Note**

In case of unavailability of one of the two beds (for example because U/S and inserted in the MEL) the turns of the four CMs obviously do not couple and rotate in 4 on the same bed, respecting the minimum times.

### **Case of aircraft equipped with Class 2 seats**

If the operator makes 2 Class 2 seats available, the same considerations as for Class 1 are applied.

On the other hand, if only one seat is made available, then it is rotated in 3 or 4 on the same place, always respecting the time limitations imposed by Easa FTL that we repeat:

- Pilots at the controls during landing 2 hours
- 90 minutes for others

### **Note 1**

Any CM added in training has the right, duty and obligation of the same rest provided by the law. In particular, if **at control during landing** must have 2 hours of uninterrupted minimum rest.

### **Note 2**

According to the aforementioned GM1 CS FTL.1.205 (c) (1) (ii) the inflight rest must be carried out during the cruising phase. There could be situations in which the number of CMs on board and the length of flight time on the cruise phase does not allow the minimum inflight rest time, in these cases (which are rare) is the duty and



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responsibility of Pilot In Command to find solutions compatible before flight departure, example:

- If possible, prepare a second resting seat (in the case of 4 CM)
- use other types of rest (eg any class 2 o 3 on board available)

### **Note 3**

The definition of "Inflight rest" does not necessarily imply that the CM should sleep, it can also rest without a sleep phase in the resting place.

### **Note 4**

The minimum rest periods (respectively of 2 hours and 90 minutes) are continuous and without interruptions and the swapping time between 2 CMs (for example the classic 10 minutes of the alarm clock) must not be considered

### **Recording of rest times**

Remind that the mode of extension of the FDP with the Inflight Rest makes it obligatory to keep track of the rest times of all CMs in case of future complaints by the Authority or in case of safety investigation; therefore it is required to record them (for example on the OFP)

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For any comments or feedback, please email to: [dt@anpac.it](mailto:dt@anpac.it)