

# **OPERATIONS BEYOND MAXIMUM FDP (ORO.FTL.205)**

## **1 INTRODUCTION**

### **1.1 PURPOSE AND SCOPE**

1.1.1 The purpose of this document is to provide guidelines to operators in Malaysia for the implementation of operations beyond the allowable FDP depicted in ORO.FTL.205.

### **1.2 REFERENCES**

1.2.1 It is intended that the following reference materials be used in conjunction with this document:

- a) Civil Aviation Regulations 2016;
- b) Flight Operations Directive – Organisations Requirements For Air Operations; and
- c) ICAO Quick Reference Guidance - Variations to existing flight and duty time limitations dated 17 April 2020.

### **1.3 ABBREVIATIONS**

Abbreviations	Meanings
CAAM	Civil Aviation Authority of Malaysia
COVID-19	Coronavirus Disease 2019
FDP	Flight Duty Period
FOD	Flight Operations Directive
FTL	Flight Time Limitation
ICAO	International Civil Aviation Organisations
IOE	Initial Operations Experience
LT	Line Training
MCAR	Civil Aviation Regulation 2016
ORO	Organisations Requirements For Air Operations
PIC	Pilot In Command

## **2 BACKGROUND**

2.1 CAAM is aware on the effect of COVID-19 on the air operators in Malaysia as well global impact from the pandemic. This document is intended to provide air operators in Malaysia with guidelines on application and implementation of operations with planned FDP exceeding the maximum allowable FDP as stated in FOD.ORO.FTL (60OR-16 Issue 3 Amendment 1).

- 2.2 This guidance is developed to ensure that air operators will be able to conduct operations within the approval of CAAM. Complying with the prescription in this document does not relieve the operator of the responsibility to manage risk, including fatigue-related risks, using its SMS in accordance with the provision of ICAO Annex 19.

### **3 APPLICATION BY OPERATOR TO OPERATE BEYOND FTL MAXIMUM ALLOWABLE FDP**

- 3.1 Any operator that wish to operate beyond the stipulated FDP limits in ORO.FTL shall submit their application to CAAM for approval.
- 3.2 All application shall be accompanied by document as listed in **Appendix A** of this document.
- 3.3 Approved variations shall provide a level of safety equivalent to, or better than, that achieved through the prescriptive fatigue management regulations.
- 3.4 Approval for maximum FDP beyond 17(seventeen) hours and up to 21 (twenty one) hours shall be a one off approval. Operators are required to apply for approval every time they wish to conduct such operation.
- 3.5 Operator shall established the augmented crew requirement and FDP in their relevant notices/documents in order to conduct this operation beyond maximum FDP.

### **4 CRITERIA FOR COMPLIANCE**

- 4.1 The following shall be the criteria for approval of any request to operate beyond ORO.FTL.205. It is divided into two sections, criteria for maximum FDP of up to 17 (seventeen) hours and additional criteria for FDP beyond 17 (seventeen) hours and up to 21 (twenty one) hours.
- 4.1.1 Criteria for approval of maximum FDP up to 17(seventeen) hours are as follows:
- a) PIC's discretion to extend duty shall be limited to 03:00 hours (three hours) only.
  - b) Additional crew members must be carried on board and in-flight relief must be utilised.
  - c) Maximum number of sectors for such operations are limited to 2 (two), however, may be increased to 3 (three) for diversion or emergency.
  - d) Night stopping at the destination shall be planned at any case. In a case the State does not allowed any night stopping, other alternative shall be taken by providing suitable accommodations at other States nearby. The

minimum rest period shall be at least as long as the preceding duty period, or 12 (twelve) hours whichever is the greater.

- e) Operator shall ensure compliance to ORO.FTL.205 (g), (1) and (2). For item (2), previously approved rest area may be utilised.
- f) All crew members operating such flights shall be accorded a minimum of 2 (two) off days after the flight.
- g) All in flight rest shall be taken in the crew bunk if available or in suitable seats in the cabin. Such seat shall be the most suitable for in-flight rest.
- h) No crew shall be rostered/planned to operate such flight (affected route) for more than once every 7 days.
- i) To reduce workload in-flight, the following applies:
  - 1) Cabin services shall be simplified.
  - 2) No IOE / LT shall be conducted unless the trainees are already functional, that is, no safety pilot required.
  - 3) No cabin performance or surveillance check shall be conducted during these operations.
  - 4) No Flight Audit or Cabin Audit shall be conducted during these operations.

4.1.2 In addition to 4.1.1, listed below are the additional criteria for approval of maximum FDP above 17 (seventeen) hours and up to 21 (twenty one) hours:

- a) In flight rest shall be taken in a compartment that separated from passengers.
- b) The rest compartment shall have temperature and lighting control.
- c) The noise level in the rest compartment must be kept at lowest possible level.
- d) Night stopping at the destination shall be planned at any case. In a case the State does not allowed any night stopping, other alternative shall be taken by providing suitable accommodations at other States nearby. The minimum rest period shall be at least as long as the preceding duty period, or 12 (twelve) hours whichever is the greater.
- e) All crew members operating the flight shall have a minimum of 2 (two) duty days off prior to operating the flight.
- f) All crew members operating such flights shall be accorded a minimum of 4 (four) off days after the flight.

## 5 MITIGATING RISKS ON OPERATIONS

5.1 Operator shall consider the following in their Risk Assessment:

- a) The necessary mitigations to address the increased fatigue risks.
- b) The flight and duty period limits and rest requirements (including pre- and post-trip pattern).
- c) how the need for adequate sleep, for limiting periods of wake, circadian effects and workload are to be addressed
- d) a contingency plan(s) that covers operational and fatigue related issues that may arise during the flight (i.e. technical problems, weather, delays, crew unfit to continue duty).

5.2 Operator should consider the following in mitigating the risks:

- a) Restricted dispatch conditions; such as fuel, limits on number of passengers, cargo, limits on turn-around time.
- b) Protection around commuting to / from work.
- c) Fatigue awareness briefing or promotions to crew members
- d) Provision for PIC to arrange inflight rest in accordance to the actual condition; such if there is a delay or operational restrictions.

## Appendix A

### APPLICATION FOR OPERATIONS BEYOND MAX ALLOWABLE FDP

- 1 Application for operating beyond maximum allowable FDP shall be accompanied by the following documents:
  - a. Risk Assessment for the proposed operations.
  - b. Mitigation action for the Risk Assessment.
  - c. Sample calculation on FDP and FDP limit for the proposed operation/s.
  - d. Draft circular/notice/memorandum to crew members on the operations.
  
- 2 Application shall be forwarded to CAAM in writing or electronic mail.
  - 2.1 Operations shall not be conducted prior to approval from CAAM.
  
- 3 Sample of table for planned FDP and Maximum Allowable FDP

SECTOR	REPORTING TIME	ETD	ETA	FDP	MAX FDP	REQUESTED MAX FDP
KUL/PKX/KUL	15:25	16:40	06:30	15:05	10:15	17:00