

Did You Know?

Rest Resets and 'Soft Starts' For Changing FDP Start Time

This communication explains the FAR 117 legal process that can be used by the Company to adjust a pilot's scheduled FDP start time for the originating leg of a pairing. The FDP start time is normally the same as the UPA report time for any duty period that includes a flying flight segment.

The FAA has clarified that once you are scheduled for an FDP, there are only two ways the company can change the start time of that FDP. Either of these methods can be used by following the guidelines described in FAR sections 117.21 and 117.25, based on how early the company is able to achieve two-way contact with the pilot:

- Rest reset with at least 10 hours notice prior to the adjusted (new) scheduled report time: If the pilot can be notified with enough time to allow for a minimum of a 10-hour rest period reset, the crew desk can assign him a 10-hour prospective rest period before the beginning of the adjusted (new) FDP start time provided they are able to achieve two-way contact with the pilot.
- "Soft Start" reset with less than 10 hours notice prior to adjusted (new) scheduled report time: If the pilot cannot be notified with enough time to allow for a 10-hour rest reset, then the crew desk can "soft start" the pilot (explained below), provided they are able to achieve two-way contact with the pilot prior to the originally scheduled report time.

Note: In both cases, two-way communication is required to reset or soft start the FDP. Simply leaving a message is insufficient; two-way contact means the pilot has been notified and has acknowledged that notification via phone or in CCS. For a soft start, acknowledgement must occur prior to the original report time as explained below.

Soft Start

The term "soft start" is used to identify the process by which the FAA allows an FDP start time to be adjusted when there is less than 10 hours before the adjusted (new) report time. A soft start is accomplished by treating the pilot as if he were placed on a SC reserve assignment period (RAP). This means the original report time instead turns into a RAP start time, which is used to recalculate the maximum duty day the same way it would be calculated for a SC reserve. It's important to note that once a trip is assigned, the UPA doesn't allow the pilot to actually be "on call" like a SC reserve. This soft start process is solely used to measure FAR duty legalities.

In order to successfully "soft start" a pilot, the following conditions must be met.

- Due to current limitations in CMS, the soft start can only be attempted on the first flight of a trip. Although a soft start is permitted by the FARs for any duty period, you should not be asked to soft start any FDP following a layover until further notice.
- The company must make two-way contact with the pilot to advise him of their intent to use a soft start to adjust the report time of the next FDP. Any pilot who is not contacted (two-way) prior to the original report time cannot be soft-started. If they are unable to make two-way contact with the entire crew, the company may be required to operate the flight within the FDP limits of the crew members not contacted, reassign part or all of the crew to different flying, or re-crew with other available pilots.
- Once you have reported to the airport and started your FDP (at report time), the start time cannot be adjusted.

Note: If a pilot is already at the airport and chooses to answer the phone or return a message before (even just one minute before) the originally scheduled report time, the pilot can be soft-started. However, depending on the circumstances, the FAA has recommended that the Company and the pilot consider fatigue mitigation measures. (e.g., a day room even when not required by the UPA) to ensure that the pilot will be able to certify Fit For Duty per FAR 117.5. If the message or call is acknowledged after report time, a pilot cannot be soft-started and will instead be considered to have begun their FDP at that report time.

Soft Start Example:

It becomes known at 0300 that a 0700 report time for a Basic FDP will be delayed until 1100. The company contacts the pilot and advises him of their intent to "soft start" the FDP, and the pilot acknowledges this change. The original 0700 report time for that FDP is now treated as the RAP start time. To calculate the correct RAP+FDP limit for that day, you must follow these steps.

- Enter FAR 117 "Table B" with your adjusted FDP report time (1100 in this example) and determine the maximum FDP for that report time (14 hours in this example).
 - Add 4 hours to that maximum limit (no more than 16 hours maximum for an unaugmented FDP) and add that number to the RAP start time (0700 in this example) and determine the FDP end time.
 - Apply the "Table B" limit to the actual FDP start time of 1100 and determine the FDP end time.
- Apply the most restrictive FDP end time between steps 1.a and 1.b. In this example the RAP limit is $0700+16=2300$ and the FDP limit is $1100+14=0100$, so the most restrictive time is 2300.

CCS

Once the company "soft starts" you, there are two places in CCS you can look to confirm your FAR legalities are being tracked properly.

- In CCS under Scheduling à Master Schedule, enter your employee number and verify that you have the "SFS" code with the time of your original report time displayed on the departure date of the trip. CMS uses this code to update your crew legality page in CCS, as shown below for pairing F4520 on the 1st with a SFS start time of 0955:

02203 FO 747		360-649-5080								
DT	CDE	SCHED	START	END	BLKT	PAYT	TBPOS	DT	CDE	SCHED
29							LF4FO	14		
30							LF4FO	15		
01		SFS	0955	1059		0000	LF4FO	16		F4713
01		F4520B	1100				LF4FO	17		*
02		*					LF4FO	18		*
03		*					LF4FO	19		*
04		*			1401	2205	2656	LF4FO	20	
05							LF4FO	21		
06							LF4FO	22		

- In CCS under Flight Planning à Crew Legality, find the "RAP/SFS Start Time" column under "Pilot Info", confirm the original FDP start time is displayed in this box and the new local report time is shown in the next column under "Local Report":

Flight Components			Most Restrictive FDP CCO Info		
Total Block	Burn Time	Taxi In	FDP CCO	FDP EXT AVAIL	FDP CCO WITH AV
10:36	10:08	:07	1745/01	Y	1945/01

Pilot Info								
Emp #	Pos	PAIRING	SEG in FDP	RSV or LH on RAP?	RAP/SFS START TIME	Local Report	Daily FDP CCO	FDP EXT AVAIL
U136484	FO	F4020C/01	1	Y	0955	1100	1745/01	Y
U020747	CA	F4020D/01	1	Y	0955	1100	1745/01	Y
U108325	FO	F4520B/01	1	Y	0955	1100	1745/01	Y

If both of these screens display the correct information, then the company can successfully track your FAR legalities associated with the "soft start" FDP.

As always, the pilot has final authority over determining his fitness for duty, especially if his rest was interrupted by a phone call from the company, as allowed by the FAA's one-phone call policy.

In the actual operation, if you have any questions about the legality of your FDP, please contact the crew desk or FODM.

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