

The background of the slide is a close-up, low-angle shot of an airplane's wing and engine. The wing is on the left, and the engine nacelle is visible in the lower center. The sky is a pale, hazy blue with some light clouds.

# Flight Time Limitations – FTL

## THE OPERATOR'S PERSPECTIVE

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# Background

## Until 16th of July 2008 – National Rules

- Very different from one country to another.
- In most countries specific rules for Commercial BizAv or < 20 seats aircraft operations

## From 16<sup>th</sup> of July 2008 – EU-OPS Subpart Q

- Applicable to all European commercial operations. Subpart Q designed for main carriers only, without taking into account specificities of Business Aviation
- However some flexibility is given by Art 8 of EU-OPS which leaves at national level the following points where Business Aviation specificities are usually still considered:
  - Split duty
  - Time zone differences
  - Reduce rest
  - Augmented crew
  - Stand by

A close-up, low-angle shot of a white aircraft wing, showing the leading edge and the wing root. The wing is set against a light blue sky background.

## Future regulation 1/2

EASA is preparing a new regulation that should be enforced at the latest by end of **April 2012**. This regulation should include the above five points. No more flexibility expected at national level.

Therefore **Business Aviation specificities** have to be taken into account in the new regulation.

A close-up, low-angle shot of a white aircraft wing, showing the leading edge and the wing structure. The wing is positioned horizontally across the top half of the slide.

## Future regulation 2/2

Three possibilities:

- I. **A single rule for all commercial operations** . Specificities of Business Aviation taken into consideration by Commission Decision authorizing one country to derogate from council regulation for a specific company . However the Basic Rule remains designed for main Carriers. -> **Not desirable**
- II. **Within the main Rule**, specific rules for Business Aviation.
- III. **A separated regulation like in USA with part 121, part 135**. In that case the rules governing Business Aviation could also cover fractional ownership operators and the operators of complex motor powered aircraft.

**EBA FAVOURS THE LAST TWO POSSIBILITIES.**

The last possibility would offer a level playing field to commercial operators and non commercial fractional operators.

A close-up, low-angle shot of a white aircraft wing, showing the leading edge and the wing structure. The wing is positioned horizontally across the top half of the slide.

# Why do we need specific rules?

**Because our operations are very different compared to the main carriers operations**

A close-up, low-angle shot of a white aircraft wing, showing the leading edge and the wing structure. The wing is positioned horizontally across the top half of the slide.

# Why do we need specific rules?

1. Less annual flight time for Business Aviation pilots than main carriers pilots
2. Majority of short notice flights
3. Frequent change of schedule/routing or sectors before or during the mission
4. Numerous early starts and late finishes but very often with long breaks
5. Sectors in Business Aviation far less inductive of fatigue
6. Frequent aircraft positioning flights without passengers
7. More crew positioning time in the duty without flight responsibilities.
8. For augmented crew better comfort on a business aircraft
9. Business Aviation pilots suffer less acclimatisation problems as:
  - a) they do back to back flight
  - b) or they stay long period at destination
10. In Business Aviation Operations, standby at airport does not exist

A close-up, low-angle shot of a white aircraft wing, showing the leading edge and the wing structure. The wing is positioned horizontally across the top half of the slide.

## Where do we need specific rules? – 1/2

1. **Number of sectors:** a typical Business Aviation flight includes three sectors. Flight duty period should therefore be reduced from the fourth sector. As mentioned before, sectors in Business Aviation are less demanding.
2. **Duty time:** should long stay at hotel be included in duty time or part of it should be deduced?
3. **Split duty** should take into account the better quality of rest facilities for Business Aviation pilots.
4. **Augmented crew:** the seat or the bunk doesn't need to be separated from the passenger cabin. First, it is not practicable. Secondly there is no comparison between a business jet cabin with less than six executives and an airliner cabin full of all kind of passengers.

A close-up, low-angle shot of an airplane's wing, showing the leading edge and the wing's structure. The wing is white and appears to be in flight against a light blue sky.

## Where do we need specific rules? – 2/3

5. **Reduced rest** should be allowed during the day, when flight duty period (FDP) and sectors are limited before and after the rest. That could be a way to solve the problem of the duty time at the hotel.
6. **Rest after flights with time zone differences** should take into account the operational specificities of Business Aviation.
7. **Breaks** should lead to longer flight duty period.
8. **Air Ambulance** operations should be covered by a specific set of rules.
9. The regulation should not limit the number of **early starts and /or late arrivals**.

A high-angle, close-up photograph of an aircraft wing, showing the leading edge and the wing's structure. The wing is white and appears to be in flight against a light blue sky.

## Where do we need specific rules? – 3/3

- 10. **On augmented crew**, no limitation below four sectors.
- 11. All **positioning** should not fully count as duty time.
- 12. **Standby**: specific approach. (Contactable concept).
- 13. Any **firm and fix planning** are not practicable for Business Aviation.

## Moreover

For Business Aviation it is absolutely essential to have a **workable** and **simple** set of rules for FTL as we have to elaborate a feasibility study for each mission.

**Any Rule limiting Business Aviation flexibility should be avoided.**

A large, highly reflective, metallic object, possibly a blade or a piece of equipment, is positioned horizontally across the top of the slide. It has a smooth, polished surface that reflects light, and its shape is somewhat elongated and curved at the ends.

**THANK YOU FOR YOUR ATTENTION**