



The Professional Aviation Maintenance Association (PAMA) would like to enter the following comments into Docket No. FAA-2001-0367, which deals with the interpretation of Duty and Rest Provisions for Maintenance Personnel. PAMA firmly believes that fatigue is an issue that maintenance technicians have to deal with constantly. The fact that the aircraft fly primarily during the day, necessitates nights and weekends be used for a majority of maintenance to be performed.

#### **Concerns with the Interpretation**

PAMA also believes that looking at days worked alone totally misses the mark when it comes to fatigue. There are numerous factors that must be considered as a whole to have a viable fatigue prevention system.

Some of the issues concern hours worked in a day. A technician might work three days in a row of 16 hours each and become fatigued way before a 6 day work week ever became an issue. Additionally, a technician who normally works until mid-night might become fatigued after only 2 hours of overtime due to working past the time he would normally go to sleep.

Additionally, what the person is doing while off duty can play a large role in the person's ability to perform their duties safely. A technician, who works nights, could easily spend their day cutting down trees, or cultivating a garden. Many of these tasks are more labor intensive than the actual aircraft maintenance.

#### **Why the Six Day Rule Does Not Work**

PAMA believes that the FAA's six day rule does not work for a variety of reasons. One example of how it does not easily fit is when companies have weekend flight coverage. Many companies have a person assigned to the weekend. If that person has already worked a five day work week, they would be unable to cover both days of the weekend.

Also, many technicians are asked to work on weekends in small blocks, ie depart a flight. To keep costs down, they are only paid for the few hours worked, but the FAA's system would count this as a whole duty day, even though the person never approaches fatigue.

The following is a sample fatigue prevention system that takes into account many of the factors mentioned above. Again this sample is for an operation that does not normally work third shift, but takes many of the fatigue issues and applies them to achieve an attainable result.

#### **Maintenance Department Duty Hours**

A. All maintenance technicians are expected to manage their personal time so as to be well rested when they report for work.

B. Maintenance Technicians shall observe the duty time limitations as described in this section and shall not work when fatigued.

C. The following guidelines apply to any 24-hour period:

- Maximum Duty Day – 14 hours (if work commences prior to 11:00 AM).
- Duty Day – 12 hours (if work commences after 11:00 AM).
- Rest Period – 10 hours.
- Consecutive Days – 60 hours in a 7 day work week will require 24 hours off duty.  
12 Consecutive Days worked will require 48 hours off.

D. No aircraft will be released from maintenance between the hours of 2:00 AM and 5:00 AM. This will require that a fresh morning maintenance crew perform quality control checks of the previous night's work.

PAMA would like to see organizations take this kind of multifaceted approach that blends as many of the fatigue causing factors, and prevents technicians from pushing themselves into unsafe working situations due to their personal desire to get the job done. Many of the large corporate flight departments have duty time requirements similar to these for their staffs. PAMA does not agree that working days alone should be the deciding factor that determines fatigue. It is one of the factors, but not even one of the primary ones to consider. In the case of maintenance operations, six days is very restrictive when taken by itself, while not really providing the benefit that is implied.

**Professional Aviation Maintenance Association**  
400 North Washington Street, Suite 300, Alexandria, VA 22314  
703-778-4647  
[www.pama.org](http://www.pama.org) [hq@pama.org](mailto:hq@pama.org)