



## 117 Delays to departure within 10 hours to FDP start

### AIMS and Delays when flying Part 117 passenger flights

Flight duty Period (FDP) limits are determined by scheduled reporting time and not by actual reporting time. The scheduled reporting time for a FDP is created once that FDP has been assigned to a flightcrew member. In order to change the reporting time, the flightcrew member would have to be shifted to long or short call reserve.

For long call reserve, the flightcrew member would have to be provided notification of the change to the FDP before beginning the rest period specified in Section 117.25, which is ten (10) hours. This means a FDP start time is set once a crewmember enters a CBA Pre-Duty Rest period which is ten (10) hours prior to reporting for duty or FDP starting time, unless the crewmember is shifted to short call reserve.

Short call reserve means a period of time in which a flightcrew member is assigned to a reserve availability period. Reserve availability period means a duty period during which a certificate holder requires a flightcrew member on short call reserve to be available to receive an assignment for a flight duty period.

If the flightcrew member is placed on short call reserve, the reserve availability period (RAP) would begin at the originally scheduled report time and the FDP would begin at CBA report time, typically 90 minutes prior to departure for an operating flight. With regards to Part 117 passenger flying, Atlas will use the AIMS code of "DLY" to signify a shift to short call reserve to delay the start of the FDP. The amount of time a crew member can spend in a RAP and FDP depends on crew augmentation. See FAR 117.21.(c).(3)-(4).

AIMS appears to have an issue when a Part 117 passenger flight is delayed and the AIMS delay code is not used. When a flight delays and the AIMS delay code is NOT used, AIMS shows the FDP start time as CBA report time, not the scheduled start time of the FDP.

An example would be a flight with a CBA report time/FDP start time of 1555Z for a 1725Z departure. CBA Pre-Duty Rest would start at 0555Z. At 1148Z the departure time is delayed to 1840Z. If the AIMS delay code, DLY, is NOT used AIMS will show the FDP start time as 1710Z. This is incorrect. The FAA would view FDP start time as 1555Z as there was no shift to short call reserve. Remember FDP limits are determined by scheduled reporting time and not by actual reporting time.

The union has informed the company of this issue and how it could lead to confusion or possible violations. Please educate yourselves to ensure the correct FDP start time so not as to violate FDP limits as listed in Table B and C of Part 117, as well as the FOM. Please note your maximum FDP/crew compliment prior to reporting for duty, especially when OE is being conducted as sometimes.