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Flying Under the Influence of Fatigue

The other day, while inflight, a Gulfstream GIV pilot was pulled over for suspicion of flying under the influence of fatigue. Yep, the airborne fatigue police were out in full force that day. And, just as suspected, the pilot did indeed have a 0.14 blood fatigue level (above the legal limit of 0.10) when measured by the accurate and very reliable “Fatigueometer.” WHAT THE ****????????

Ok, now that I’ve got your attention, let’s get serious. Pilot fatigue has, and continues to be, a very real threat to aviation safety. Recently, the U.S. Federal Aviation Administration (FAA) overhauled its prescriptive flight, duty and rest regulations for Part 121 carriers as a partial offset to the pervasive fatigue problem. This is a step in the right direction, as the original regulation was enacted over half a century ago when transportation fatigue research was still in its infancy. What I am still having a hard time understanding, though, is why the new regulation has excluded freight and cargo operators, some of which need the regulation even more so than their passenger flying counterparts. In my opinion, this was a serious oversight, and I believe that the crash of UPS Flight 1354 elucidated the significance of the problem. See the official U.S. National Transportation Safety Board (NTSB) accident report here <http://tinyurl.com/p7lg8ja>.

Most problematic, however, is the Part 91 (primarily business aviation) realm. Part 91 operators do not have prescriptive flight, duty and rest regulations like their Part 121

counterparts. Thus, Part 91 operators have the option of “flying their pilots to sleep,” or taking a safer, proactive approach by devising their own flight, duty and rest guidelines. The latter is obviously a prudent choice and guidance targeted specifically for Part 91 operators can be found at <http://flightsafety.org/current-safety-initiatives/duty-rest-guidelines>. This link will take you to the recently revised National Business Aviation Association (NBAA) Duty/Rest Guidelines for Business Aviation document.

In addition to the NBAA recommended guidelines, Part 91 operators should also consider implementing a Fatigue Risk Management System (FRMS). An FRMS offers the most robust management of safety risks related to fatigue, and it is part of the company’s existing (or soon to be existing) Safety Management System (SMS). A formal FRMS addresses fatigue holistically and thus will not only provide flight, duty and rest guidelines but also fatigue education and awareness as well as a non-punitive fatigue reporting scheme, among other things. FRMS also emphasizes that fatigue mitigation is a shared responsibility between the organization and the pilots. The best organizational policies will fall short if pilots’ personal lifestyles are in conflict with organizational fatigue policies and philosophies; conversely, the best personal lifestyles will not help to resolve the problems of an organization that pushes pilots beyond their useful limits on each and every trip. Eventually something will have to give. And you know what might happen then...