

# FC5300

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**Category:** [Flight Crew \(Commercial\)](#)

**Report Title** FDP start time later than arrival for work

## Initial Report

Definition of FDP commencing starts at gate area in airport rather than when crew member arrives at airport. It is not possible to be resident in the airport gate area so FDP is starting at a later than real start of duty. For those off-site parking who are unable to use public transport, a further mandatory bus journey compounds the issue. Airline manual makes it mandatory to report at the airport terminal commonly 30mins before FDP is begun. This could mean crew members are actually on duty beyond legal limits but it is not caught due to airline policy artificially commencing FDP later than reality.

## Comment

FDP starts from the point you report for any duty (duty being any activity done as a requirement for the company, including training, positioning or ground duties) and ends at engines off on the last sector. The overall relevant regulation is [ORO.FTL.205 'Flight Duty Period \(FDP\)'](#). The location at which crews report will be specified within OM-A, and this is when FDP commences. The report location varies for individual airlines but may be before or after security, perhaps in the crew operations area, or another specified point. Regulations acknowledge that there will be commuting time to get from home to the report location and the associated start of FDP but this can differ depending on location and company agreements and is not specifically approved with the CAA as part of the AOC operating licence. [GM1 ORO.FTL.205\(a\)\(1\)](#) refers, but rather unhelpfully simply provides the bland statement that: *"The operator should specify reporting times taking into account the type of operation, the size and type of aircraft and the reporting airport conditions."*

In all of this, it's important to be aware of the distinction between FDP and FTL. FTL is solely about flight duties whereas FDP encompasses FTL and any other company duties before a flight. From [ORO.FTL.105](#):

(10) 'duty' means any task that a crew member performs for the operator, including flight duty, administrative work, giving or receiving training and checking, positioning, and some elements of standby;

(11) 'duty period' means a period which starts when a crew member is required by an

operator to report for or to commence a duty and ends when that person is free of all duties, including post-flight duty;

(12) 'flight duty period ('FDP') means a period that commences when a crew member is required to report for duty, which includes a sector or a series of sectors, and finishes when the aircraft finally comes to rest and the engines are shut down, at the end of the last sector on which the crew member acts as an operating crew member;

(13) 'flight time' means, for aeroplanes, the time between an aircraft first moving from its parking place for the purpose of taking off until it comes to rest on the designated parking position and all engines or propellers are shut down;

(22) 'rotation' is a duty or a series of duties, including at least one flight duty, and rest periods out of home base, starting at home base and ending when returning to home base for a rest period where the operator is no longer responsible for the accommodation of the crew member;

Graphically, the following gives a generic representation as an example:



CHIRP has sympathy with the reporter because as operations have evolved (particularly since the COVID pandemic), some people who may have chosen to live at a certain distance from their base that worked in the past may now face difficulty in meeting current security and screening requirements etc that may significantly add to their commute-to-report time. There is no regulatory time specified for the commute and subsequent passage through the airport terminal to the report point for the obvious reason that every airport's and operator's circumstances are unique; but it is not legal for a company to require people to 'report' 30mins prior to FDP because, by definition, FDP starts at the time people are required to be at the report point or other location where they are required to commence company duties.

Although not now strictly applicable to UK AOCs, EASA has previously published a commentary about when FDP starts in relation to security checkpoints and report points in their document [EASA FAQ n.135897](#) which is reproduced at the end of this newsletter. The response is clear that duty (and hence FDP) starts at the Report Point unless crew members are required to commence an

activity such as passing through a security checkpoint (our underlining/highlighting in the attached text at the end of this newsletter). We have asked CAA whether they have a similar interpretation of when duty commences and they responded by saying that the journey time before report will be looked at as part of their ongoing overall FTL review this year which will consider the associated baseline assumptions and fatigue metrics.

Within this issue, it is often commented that regulations and company processes cannot factor in the nuances of every airport journey from arrival at the airport to the designated report point. Whilst we agree that generic regulations cannot be so specific, we do not think it is beyond companies to determine what the average expected time spent getting to the report point should be for each airport/report point combination and time of day. If companies chose to place the report point airside (either at a common reporting area or gate) then they should ensure that this is factored into the airport arrival-to-report journey duration. At the moment, companies are abrogating this responsibility to the crews who must individually calculate their optimum arrival time at the airport in order to meet their report time; *CHIRP* thinks that the companies should either make the report point the airport arrival time or should modify FDPs to account for the average time spent getting from airport arrival to the report point. On the other hand, the commute from home to the airport is the crews' responsibility, it is for crews to ensure that they live at a suitable distance from their base airport so as to avoid prolonged commutes, with the exception that if the company subsequently changes their base location then a suitable mitigation may need to be agreed.



