



Arizona State Forestry Division
Bureau of Indian Affairs: Southwest, Navajo, Western Regions
Bureau of Land Management: Arizona, New Mexico
National Park Service, Intermountain Region
New Mexico State Forestry Division
U. S. Fish and Wildlife Service, Region 2
U. S. Forest Service



Date: June 28, 2011

To: Southwest Area Fire Management Officers and Unit Aviation Managers

From: Chair, Southwest Coordinating Group

Topic/Issue: Implementation of Phase 2 Interim Duty Limitations for Federal, State and Vendor Flight Crews

The National Multi-Agency Coordinating Group has implemented Phase 2 Interim Flight and Duty Limitations (herein referred to as “duty limitations”) for flight crews in all Geographic Areas, effective Monday, June 27th. This provides an additional day off in each 14 day period (for example, a flight crew working a schedule of 12 days on and 2 days off will receive 3 consecutive days off).

This memorandum provides further information and establishes guidance for implementation of duty limitations in the Southwest Geographic Area.

The Southwest Area Aviation Committee will monitor implementation of duty limitations and will provide feedback to the Southwest Area Multi Agency Coordinating Group regarding potential impacts to firefighting operations.

Implementation of duty limitations is mandatory. Exemptions can be given by Regional or State Aviation Managers on a geographic or single resource basis, since it is acknowledged that not all pilots are at the same level of fatigue.

Large Air Tankers

Phase 2 duty restrictions are being implemented for the large airtankers nationally, and a revised schedule of days off has been established (See Attachment).

Exemptions to Duty Limitations

Aircraft Managers may request an exemption from the Phase 2 duty limitations provided that they ensure that aircrews are meeting the intent of the limitations (i.e. to reduce fatigue and provide for aviation safety). The following are examples of when exemptions may be considered.

- Double crews (two (2) complete flight crews assigned to an aircraft).
- Augmented flight crews (an additional pilot-in-command assigned to an aircraft).
- Flight crews that work a rotating schedule, (i.e. two (2) days on, one (1) day off, seven (7) days on, seven (7) days off, twelve (12) days on, twelve (12) days off).
- Flight crews on other schedules that have experienced a low level of flight activity.

Requesting an Exemption

The Southwest Area Aviation Committee will review all requests for exemptions for pilots operating in the Southwest Area, and will make recommendations to the Regional or State Aviation Managers. The following procedures will be used in the Southwest Area:

1. The local aircraft manager, or incident management team, will submit a request to the Regional/State Aviation Manager. Justification for a request may include:
 - A limited number of hours flown since the flight crew's previous days off
 - Short duration duty days (10 hours or less per day)
 - Flight crews stationed at their home base, or having been in travel status for less than 21 days
2. Concurrence with the request to waive the extra day off must be unanimous among:
 - the pilot/flight crew members
 - the pilot's company, or supervisor
 - the incident management team, or the local aviation manager, as appropriate
3. The request for an exemption should be forwarded to the Regional/State aviation manager for the agency having operational control over the aircraft.
4. The Regional/State aviation manager will forward the request to the Southwest Area Aviation Committee. The committee will make a recommendation as to whether the request should be approved. This recommendation will be completed within 24 hours of receiving the request. The final decision to approve or deny the request will be made by the Regional/State aviation manager.

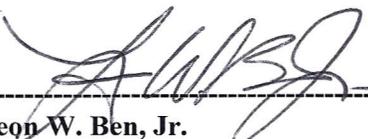
An exemption will **only** apply to one duty cycle. A new request must be prepared if an exemption is desired at the completion of the next cycle.

Exemptions to the additional day off may be authorized by Regional or State Aviation Managers, but exemptions should be the exception, not the rule.

For further information

John Selkirk, Chair, Southwest Aviation Committee 505-954-2192
Kris Damsgaard, Regional Aviation Officer, 505-503-0675

* Policy for interim flight and duty limitations is contained in Chapter 16 of the 2011 *Interagency Standards for Fire and Fire Aviation Operations*. For the Bureau of Indian Affairs, guidance is contained in Chapter 8 of the 2011 *Wildland Fire and Aviation Program Management and Operations Guide*.



Leon W. Ben, Jr.
Chair, Southwest Coordinating Group

Attachments:

- NMAC Phase 2 Duty Limitation Memo
- Large Airtanker Schedule Revision



National Interagency Fire Center

3838 S. Development Avenue
Boise, Idaho 83705

June 25, 2011

To: Geographic Area Coordination Group Chairs
From: National Multi Agency Coordinating Group
Subject: Implementation of Phase 2 Interim Flight and Duty Limitations

The high level of fire activity we are experiencing has been sustained for some time now. Aviation resources have been utilized extensively in our suppression efforts. A review of recent incidents, as well as communication from the field, indicates that fatigue is becoming a factor with some flight crews. Well-rested flight crews are a key component of safe operations and accident prevention.

In order to ensure that our flight crews remain well rested, we have decided to implement Phase 2 Flight Duty Limitations for all Geographic Areas. Beginning Monday June 27, 2011, the following restrictions will apply to all aviation assets:

- Each flight crew member shall be given an additional day off each fourteen (14) day period. Crews on a twelve (12) and two (2) schedule shall have three (3) consecutive days off (11 and 3). Flight crews on six (6) and one (1) schedules shall work an alternating weekly schedule of five (5) days on, two (2) days off, then six (6) days on and one (1) day off.
- Aircraft fixed daily rates and special rates, when applicable, shall continue to accrue during the extra day off. Contractors may provide additional approved crews to maximize utilization of their aircraft. All costs associated with providing the additional crew will be at the contractor's expense, unless the additional crew is requested by the Government.

Understanding that not all Geographic Areas are engaged at this high level of activity, exemptions to this direction can be made by Regional or State Aviation Managers on a geographic or single resource basis.

/s/ John Glenn
Chair, NMAC (acting)



File Code: 5700
Route To: 6730

Date: June 25th 2011

Subject: Implementation of Fatigue Reduction for Large Airtankers

To: Regional Aviation Officers and Large Airtanker Contractors

Phase 2 flight and duty restrictions are being implemented for the airtankers nationally in conjunction with other aviation resources. The NMAC letter regarding this action which begins on Monday June 27th is included.

For Large Airtankers this action is being taken due to the earlier and higher than normal operational tempo. Although individual airtankers and flight crews may have been on contract for different durations, it is prudent to take this action to preclude fatigue in the remainder of this season. Additionally, this will provide for additional time for aircraft maintenance and/or time off for the maintenance crews as scheduled by the contractors based on their specific situation. This is the schedule beginning Monday June 27th. Tankers will rotate on the additional day off for Phase 2 as follows:

Monday	T-07 an additional day off and T-25 and T-06 normal day off
Tuesday	T-06 an additional day off and T-12, T-17, and T-22 normal day off
Wednesday	T-12 and T-22 an additional day off and T-00 and T-43 normal day off
Thursday	T-00 an additional day off and T-55, T-10, and T-05 normal day off
Friday	T-10 an additional day off and T-11, T-23, and T-48 normal day off
Saturday	T-11 an additional day off and T-45 and T-44 normal day off
Sunday	T-45 an additional day off and T-21 and T-07 normal day off
Monday	T-21 an additional day off and T-25 and T-06 normal day off
Tuesday	T-25 an additional day off and T-12, T-17, and T-22 normal day off
Wednesday	T-17 an additional day off and T-00, T-27, and T-43 normal day off
Thursday	T-43 an additional day off and T-55, T-10, and T-05 normal day off
Friday	T-55 an additional day off and T-11, T-23, and T-48 normal day off
Saturday	T-48 and T-23 an additional day off and T-45 and T-44 normal day off
Sunday	T-44 an additional day off and T-21 and T-07 normal day off

Note: T-05 just came on contract and T-27 has yet to come on contract. Both will begin Phase 2 schedule after 28 calendar days on contract.

Any questions concerning this schedule should be directed to Scott Fisher (208) 387-5968.

/S/ SCOTT A. FISHER
Scott A. Fisher
Large Airtanker Program Manager



cc: Karyn Wood
cc: Pat Norbury
cc: Bridget Downing
cc: Art Hinaman

attach: NMAC Letter