

14-Hour Crew Duty Day

Current FAA 135 rules specifically explain when the 10 hours of flight duty (for airplanes crewed with 1 or 2 pilots) within 24 hours may be extended, and how much additional rest is required when the 10 hours is exceeded.

No such explanation is written concerning the 14-hour duty day rule. The 135 regulations do not specifically say that the 14-hour duty day may be extended, but they also do not specifically forbid exceeding the 14-hour duty day.

According to what I've heard, certain FSDOs say that the 14-hour duty day may be extended, similar to how the 10-hour flight duty hours may be extended, while other FSDOs say that the 14-hour duty day may not be exceeded under any circumstances. This same disagreement is also seen with various 135 organizations, with some of them telling their pilots the 14-hour duty day may be extended, and other organizations do not allow it. Pilots I have talked to also disagree about the legality of extending the 14-hour duty day.

I would like to see the 135 rules re-written to either forbid the extension of the duty day, or explain why and what the consequences for crew rest are of exceeding the duty day, similar to the wording that explains the extension of the daily flight time limits.

On-duty/Off-duty

Currently, under part 121, there are duty day limitations when you are on reserve/on-call. Under 135, there are no such limits. When you are on call under part 135, you can be on call indefinitely, if your organization so desires. You can be on a pager, on-duty, 24 hours a day, until you are called for duty (which may be for days or even weeks before you get a trip). I think that for safety reasons related to crew fatigue, 135 pilots on reserve/on-call should have a limited number of hours of duty per day, and then there should be a period off-duty, so the pilot can plan remain rested while waiting for a flight.