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**FEDERAL EXPRESS MEC  
AIR LINE PILOTS ASSOCIATION**

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September 28, 1994

Dr. Mark Rosekind  
NASA Ames Research Center  
Moffett Field, CA 04035-1000  
MS 262-4

Dear Dr. Rosekind:

On behalf of the Federal Express Master Executive Council (MEC) of the Air Line Pilots Association (ALPA), I would like to thank you for the briefing you and Dr. Gander provided on the Overnight Cargo Operation Study conducted by the NASA Ames Research Center. I am responding to Dr. Lebacqz's requests in relationship to the study and look forward to publication of the corresponding NASA Technical Memorandum.

ALPA at Federal Express would appreciate being acknowledged in the report, and I feel certain that the Federal Express pilots who participated would also appreciate an acknowledgment as "FedEx pilots". Their individual acknowledgment is, I feel, up to them, if such acknowledgment is proposed.

I am also providing a synopsis of our collective comments on the draft of the Technical Memorandum. I believe Captain David Wells, our Central Air Safety Chairman, has already submitted technical corrections. The most important of those is that we operate as a Supplemental Air Carrier under FAR Part 121 and have less restrictive duty time/flight time limitations than Domestic Air Carriers under the same FAR.

The following observations may be helpful in the preparation of the final conclusions. As you may recall, I was the FedEx Assistant Chief Pilot responsible for administration of the study with Linda Connell and Curt Graeber, so I am very familiar with the changes in our crew force and operations since then.

I would thus offer the following:

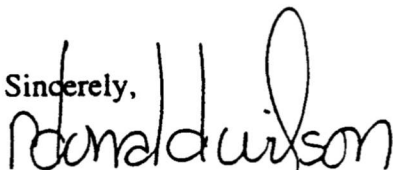
- Due to our own growth and the acquisition of Flying Tiger, our crew force has more than tripled to approximately 2400 pilots.
- Though I do not have a precise number at hand, there is no doubt that the median and average age of our pilots has increased since the study.
- The number of days scheduled per 28 day bid period has also increased. Thus, we have more pilots, at a higher average age, flying more of the same type trips used in the study.
- In addition to more "scheduled" flying days, persistent manning shortages have resulted in more "overtime" flying days since the study.

- The number of flying lines with a longer duty break (i.e. recovery period) somewhere in the sequence have declined as a percentage of total lines of flying.
- FedEx has become much more a global carrier, and multiple time zone changes affect many more pilots. Schedules often contain a mix of long haul or international flying with the type flying used in the study, thus time zone shift factors now precede or follow many trips such as those studied.
- There are a number of long haul trips in our international system that originate in the 0300 to 0500 time slot, both east-bound and west-bound, and these may occur with no more than 24 hours rest period prior to or after a sequence of trips such as those studied.
- Although I do not have access to the specific data, I believe there is more use now of sick leave to address the problem of fatigue, leading me to believe there is now more baseline fatigue, much of it *not* handled with the use of sick leave.

In summary, I believe a now *older* pilot group flies *more* often under *worse* conditions (time of day/circadian disruption) from an inherently *more* fatigued start point than was apparent in the study. That start point is degraded because of more flying days, less "recovery" time and greater circadian shift than was applicable to our pilots at the time of the study.

I hope these comments and observations are helpful in preparing the publication of the "FedEx" Overnight Cargo Operation Study. Thank you again for your presentation, and please accept our apology for the behavior of our management. If I may be of any assistance. please don't hesitate to ask.

Sincerely,



Captain R. Donald Wilson, Chairman  
Federal Express Master Executive Council  
Air Line Pilots Association

cc: FDX MEC  
Captain Dave Wells