



Office of the Chairman

National Transportation Safety Board

Washington, D.C. 20594

JUN 28 1996

Mr. Mark S. Estabrook
Post Office Box 1021
Cordova, Tennessee 38088

Dear Mr. Estabrook:

Thank you for your June 18, 1996, letter in which you expressed your concern about alleged improprieties in the National Aeronautics and Space Administration's (NASA) publication of Technical Memorandum (TM) No. 110380, "Crew Factors in Flight Operations VII: Psychophysiological Responses to Overnight Cargo Operations," and the use of that and other NASA research in the Federal Aviation Administration's (FAA) issuance of a notice of proposed rulemaking (NPRM) on December 11, 1995, entitled "Flight Crewmember Duty Period Limitations, Flight Time Limitations and Rest Requirements." The NPRM proposes to modify flight and duty time rules and regulations for commercial and air transport pilots.

The Safety Board appreciates your concern about this important issue. The Safety Board has identified pilot fatigue as a factor that has either caused or contributed to two accidents that involved air freight transport flights in which the aircraft were destroyed. One occurred at the U.S. Naval Air Station in Guantanamo Bay, Cuba, on August 18, 1993, in which the three crewmembers sustained serious injuries. The other occurred at Kansas City International Airport on February 16, 1995, and the three crewmembers were killed.

After the first accident, the Safety Board issued a safety recommendation to the FAA to revise the flight and duty time regulations applicable to all commercial and air transport flight operations. The NPRM to which you refer was issued in response to the Board's recommendation, and because of the generally perceived need to improve flight safety by reducing opportunities for pilot fatigue. The NPRM was based on a report developed and written by four NASA scientists who are prominent in the field of human sleep research.

The Safety Board agrees that "back side of the clock" flying--that is, operating during periods of the early morning when circadian rhythms are at a low point--can adversely affect pilot performance. The Board's comments to the FAA on this NPRM, a copy of which I am enclosing, illustrate the Board's position on this matter and its belief that the pilot flight and duty time rules should address this issue.

Thank you again for your letter. Please do not hesitate to contact me if you have any questions.

Sincerely,



Jim Hall
Chairman

Enclosure