



# The Cathay Pilots Union

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The Director-General of Civil Aviation  
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Dear Mr Lo

## Cathay Pacific Airways Approved Flight Time Limitation Scheme (CPA AFTLS)

We are in receipt of your Acting Chief Flight Standards' reply, dated 10<sup>th</sup> January.

Our previous correspondence exhaustively explained why:

- the new reserve provisions in the current CPA AFTLS are contrary to both the CAD 371 "Avoidance of Fatigue in Aircrews" provisions and, moreover, the Air Navigation Order, and
- using Normal Rest to comply with the limitations of Table R "Minimum Required Rest Period" following ULR is contrary to the current CPA AFTLS, the CAD 371 "Avoidance of Fatigue in Aircrews" provisions and, moreover, the Air Navigation Order.

### Reserve Duty

In our previous letter (Section "Assessment" - Page 6), we explained why the new reserve provisions do not comply with either your own CAD 371 or the AN(O). Unfortunately, the response from your Department does not address the regulatory concerns we raise.

### Rostered Duty Following Positioning Flight

In our previous letter (Section "Assessment" - Page 13), we explained why the rostered duty did not comply with the operator's AFTLS, your own CAD 371 or the



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AN(O). The response from your Department has not attempted to address our explanation but merely stated an opinion. By raising his query with the operator, it is evident that the individual crew member complied with his responsibilities under CAD 371 Para 4.2. However, you have not clarified how the other provisions have been complied with.

There is a further related issue. One of the General Conditions for the issuance of Air Operators' Certificates is that every flight under that certificate shall be conducted in accordance with the relevant provisions of the operations manual as approved by your Department. By scheduling a crew member outside the Minimum Required Rest Period stipulated in Table R, the operator is not complying with its AOC. Please can you clarify the CAD's position on this?

### Summary

The Cathay Pilots Union respectfully requests that you address the issues raised in our previous letters and explain how the two respective duties comply with the provisions relating to the avoidance of fatigue in aircrew.

Yours sincerely

for The CPU