

PMSA DATA REQUEST NO. 103: Further, with respect to your testimony at Exh. CAC-1Tr 84:3-85:6, please provide all of the following: (a) identify the specific pilots and instances as discovered in your examinations of the pilot assignment databases where pilots would “begin their next work-shift interval pre-loaded with fatigue”; (b) identify the specific pilots and instances as discovered in your examinations of pilot assignment databases which are currently operating at more than an “average 5% or less” of callbacks; (c) identify the specific pilots and instances based on your examinations of pilot assignment databases which are currently operating in a manner that is “unsafe from a fatigue management standpoint”; and (d) based on any other extrinsic datasets, including BPC incident reports, please identify any other specific pilots and incidents which have resulted in PSP operations which are “unsafe from a fatigue management standpoint” and upon such identification provide copies of the extrinsic datasets.

RESPONSE TO PMSA DATA REQUEST NO. 103:

BWPO did not identify any specific pilots or instances responsive to (a) through (d).

PMSA DATA REQUEST NO. 104: If no individual pilots or circumstances are identified in response to PMSA DATA REQUEST 103, admit that the Puget Sound Pilots are currently operating in a manner that is safe from a fatigue management standpoint, and further admit that any opinion regarding instances of the Puget Sound Pilots currently operating in a manner which is unsafe is an opinion which is theoretical only and not supported by any assignment data evidence.

RESPONSE TO PMSA DATA REQUEST NO. 104:

Deny. In my opinion, the current level of callbacks being experienced by PSP is permitting a situation where the risk of a fatigue-related incident is too high. The PSP fatigue risk management system needs guardrails to prevent periods of time when a PSP pilot is performing too many assignments during that pilot's off-watch interval. BWPO had a dual charge in its work for PSP: to assist PSP in developing efficiencies that increase the level of assignments during a pilot's on-watch interval and to develop the associated and necessary work/rest best practices. An adequate respite period designed to recharge a pilot following a more intensive work cycle is appropriate and should be protected from levels of callback work that undermine the function of the off-watch rest interval. In my opinion, the sleep science supporting BWPO's recommendations makes clear that excessive callback levels create fatigue management risk that is not theoretical only. These recommendations are designed to ensure that pilot efficiency is higher during a PSP pilot's on-watch interval and that opportunities to rest and recover are assured during the off-watch interval. Increasing on-watch efficiency necessarily will increase the intensity of a pilot's on-watch duty interval, thus reducing the rest opportunities in that interval. Therefore, this necessitates measures to prevent levels of work off-watch that would undermine the respite function of the off-watch interval.

PMSA DATA REQUEST NO. 105: If no admissions are made in response to PMSA DATA REQUEST 104, admit that the management of Puget Sound Pilots is making decisions with respect to managing pilot assignments and pilot dispatching which are unsafe from a fatigue management standpoint.

RESPONSE TO PMSA DATA REQUEST NO. 105:

Deny.

PMSA DATA REQUEST NO. 106: Further, regarding your testimony at Exh. CAC-1Tr 84:3-85:6, admit that the management of pilot schedules consistent with rest rules which increase the on-duty availability of pilots for assignments will reduce the need for off-duty assignments and therefore reduce callbacks by pilots who are off-duty.

RESPONSE TO PMSA DATA REQUEST NO. 106:

Admit.