U.S. Department
of Transportation
**Federal Aviation
Administration**

Office of the Chief Counsel

800 Independence Ave., S.W.
Washington, D.C. 20591

MAY – 7 2012

Russ Leighton
Aviation Safety Coordinator
Teamsters Local 1224
2754 Old State Route 73
Wilmington, OH 45177

Dear Mr. Leighton,

This letter responds to your January 3, 2012 inquiry regarding a recent interpretation issued by the FAA (Letter to Capt. Rodney C. Ennis from Rebecca B. MacPherson, Assistant Chief Counsel for Regulations, Nov. 2011 ("Ennis")), dealing with the application of the rest requirements found in 14 C.F.R. 121.503(b) and 121.505(a). Your inquiry mentioned that one of the carriers you represent interpreted the use of the term "further duty" in the Ennis interpretation to allow a pilot that has flown more than eight hours in a 24 consecutive hour period and who is now on the ground, to complete any remaining flight segments for that assigned duty period prior to receiving the rest required by § 121.503(b).

Subsequent to your inquiry, our office received a request for a meeting from ABX Air, Inc. ("ABX"), to discuss their viewpoints on Ennis and other interpretations issued by the FAA. As a result of that meeting, ABX submitted several questions and scenarios for review. In response, the FAA is issuing an interpretation to ABX clarifying the application of the 16 hour rest requirement of § 121.503(b), finding that once a pilot completes any flight segment and has flown more than 8 hours in a 24 consecutive hour period, that pilot may *not* delay receiving 16 hours of rest until after the completion of the previously assigned schedule. A copy of that interpretation is enclosed.

We appreciate your patience and trust that the above responds to your concerns. If you need further assistance, please contact my staff at (202) 267-3073. This letter has been prepared by Robert H. Frenzel, Manager, Operations Law Branch, Regulations Division of the Office of the Chief Counsel and coordinated with the Air Transportation Division of Flight Standards Service.

Sincerely,

Rebecca B. MacPherson
Assistant Chief Counsel for Regulations, AGC-200

Encl: