



## FEDERATION OF INDIAN PILOTS

Ref No: FIP/DGCA/2022 - 05

06th June 2022

To,  
Shri Arun Kumar, IAS  
Director General of Civil Aviation  
Office of Director General of Civil Aviation,  
Aurobindo Marg, opp. Safdarjung Airport,  
New Delhi, 110003.

**Sub: Issues regarding e-logging of flying hours on eGCA.**

**Ref: DGCA Flight Crew Licensing Circular 02 of 2019(F. No. AV. 11012/5/2018 - DTL-DGCA) dated 30th December 2019. ("Circular")**

Dear Sir,

The Federation of Indian Pilots (FIP), India's foremost body of Professional Pilots was founded in 1996 to address various issues pertinent to the Civil Aviation sector.

As you are aware, the above captioned Circular has compulsorily mandated the electronic logging of flying hours by pilots on eGCA portal.

Clause 6 of the Circular states;

*(6) Flying experience: Registered candidates shall log their flying details in e-logbook available in their eGCA profile regularly. The e-logbook entries shall be made by candidate and certified/approved by authorized personnel, as per Rule 67 of Aircraft Rules, 1937 through eGCA. All entries shall be meticulously logged as the entries once approved by the authorized personnel cannot be altered subsequently. CFIs/Dy CFIs/Authorized Personnel are advised to register on the eGCA platform and validate the entries from their respective profiles after registration. All such entries shall be meticulously verified before certification/approval. With the launch of Phase I of eGCA portal, henceforth CPL aspirants undertaking flying training are advised to log their previous as well as current flying experience details in the e logbook.*

FIP and its members appreciate the underlying objectives of digitalisation of the logging process. Nevertheless, we have received numerous representations from our member pilots which highlight several legal as well as technical concerns regarding the implementation of the e-logging under the Circular. Particularly, we are concerned that the legislative amendments and technical modifications which are required to be made have not been undertaken. Further the Circular as implemented do not consider the best practices on e-logging of the flying hours as may have been adopted in other jurisdictions.

We would like to set out below a few of the salient legal and technical irregularities in the implementation of the Circular;

**i. Violative of the Rule 67A(2):**

Rule 67A(2) specifically mandates that "All entries in log books shall be made in ink". Hence, e-logging under the Circular is inconsistent and violative of the specific directions provided under rule 67A(2) of the Rules.

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It is submitted that it is trite law that directions issued under departmental Circular cannot override the specific provision of the Rules, which are enforced in terms of the provisions of the Aircraft Act 1934 (“**The Act**”).

Therefore, it could be safely concluded directions under the Circular, to maintain the flying records electronically other than physically as mandated under rule 67A(2), are violative of the Rules and liable to be modified accordingly.

It is submitted that the Circular could only be legal and validly implemented after necessary amendments to the existing provisions of the Rules. That such regulations of e-logging have to be made after compliance with the procedure under Sec 14A of the Act.

ii. **Non-compliance with Rule 17:**

That as per the rule 17 of the Aircraft Rules 1937 (“**Rules**”) the pilots are obligated to produce log books and other documents granted or required to be maintained under the Rules for inspection on demand for inspection, by any magistrate, any police officer above the rank of sub-inspector, any Customs officer, any commissioned officer of the Naval, Military or Air Force of the Union, any gazetted officer of the Civil Aviation Department in Government of India, or any other person authorised by the Central Government by special order.

However, due to electronic logging of the flying details, under the Circular, the pilots would not be able to produce the log books for inspection if called upon by any of the aforesaid authorities. Consequently, could invite penal action or adverse remarks in inspection reports from the authorities against the pilots.

iii. **Mandatory e-logging makes the compliance with Rules 67A(9) impossible:**

Rule 67A (9) mandates the logging of the total flight during which an Airline Transport Pilot’s Licence holder acted as a pilot in command. However, in the case of pilots engaged in multiple crew operations, the said rule becomes impossible to comply, under the e-logging mandate of the Circular.

iv. **Cyber Security:**

There have also been concerns about the security vulnerabilities of the eGCA database and it is observed that no information about data protection guarantees or encryption protocols has been disclosed in the public domain, to allay the cyber security and data privacy concerns of the users of the portal.

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**v. May lead to adverse implications on inflight fatigue risk mitigation:**

The effect of the Circular is further exacerbated by other directions of the DGCA mandating a specific format for inflight rest of pilots, on ultra-long haul flights. Conjoint application of the Circular with other DGCA directions is in variance with practical realities and may lead to adverse implications on inflight fatigue risk mitigation.

In view of the above, it is evident that the Circular and e-logging mandate is violative of the Rules and has impractical consequences. The aforesaid concerns raised are not exhaustive and only indicative and salient.

FIP would like to submit an exhaustive list of complaints and issues routinely faced by its pilot members, relating to the e-logging of flying hours. Therefore, we request you to accord us an appointment with concerned officials of the DGCA in order to take this representation forward. Therefore, FIP would like to request you to pass the necessary direction for the suspension of the Circular and/or the practice of e-logging of flying hours till robust legislative amendments and technical modifications are implemented to accommodate best practices on e-logging of the flying hours.

Thanking you,

Yours faithfully,

**FEDERATION OF INDIAN PILOTS**

**(Capt. Surinder Mehta)**  
**President, FIP**

Copy to:

- 1) Hon. Minister of Civil Aviation
- 2) Secretary – Ministry of Civil Aviation