



FEDERATION OF INDIAN PILOTS

Ref No: FIP/DGCA/2025 - 02

11th July 2025

To,
Mr. Faiz Ahmed Kidwai,
Director General
Office of the Director General of Civil Aviation,
Opp. Safdarjung Airport,
Aurobindo Marg,
New Delhi - 110 003.

Subject: Request for clarification pertaining to clause 10.1 Note 3 of CAR Section 7 Series J Part III- Duty Period, Flight Duty Period, Flight Time Limitations and Prescribed Rest Periods – Flight crew Engaged in Scheduled Air Transport Operations, revised on 26.03.2024 (“Revised CAR”).

Ref: Proceedings before the Hon’ble High Court of Delhi, namely Federation of Indian Pilots v. Director General of Civil Aviation W.P.(C) 616/2023. (hereinafter “Writ Petition”)

Dear Sir,

1. Greetings of the season.
2. We are, the Federation of Indian Pilots (“FIP”), registered as a Society under the Societies Registration Act 1860 and as a Public Trust under the provisions of the Bombay Public Trust, 1950, having its office at C-1202 Lotus Corporate Park, Off Western Express Highway, Near Jai coach signal, Goregaon East, Mumbai - 400063. FIP has around 5000 members who are pilots and / or related to the field of aviation. FIP objects include inter alia, to carry out all activities to develop the profession of and the field of aviation and to submit views or make representations before the Government or other authorities on any subject affecting the interest of its members.
3. We write in reference to note 3 of clause 10.1 of Revised CAR which states that “In case a flight crew returns to duty after leave, the minimum rest period of 10 hrs (from 0000hrs) shall be given. The leaves shall be considered as local days.”. It is also pertinent to state that DGCA had also, vide its affidavit dated 19 Feb 2025 filed in the writ petition, had also reiterated the said provision and undertook its implementation from 01 Feb 2025.
4. Several operators have issued their FDTL schemes in line with the Revised CAR. However, a review of these schemes reveals that Note 3 of Clause 10.1 has been applied only in cases where the flight crew return to duty after published leave. This narrow application excludes unpublished leave, such as emergency or unplanned leave, from its scope. Such a restrictive interpretation undermines the intent of the provision and significantly impacts fatigue management, as it denies flight crew the necessary recovery safeguards in situations where they may be most needed.
5. FDTL schemes of the scheduled operators have been approved by the DGCA and that the DGCA has issued a clarification stating that Note 3 of Clause 10.1 is applicable only to the published leave.

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6. In view of the aforementioned, we would like to request the following:

- a) Please confirm if any clarification has been issued regarding Clause 10.1 of the Revised CAR.
- b) If yes, kindly share a copy of the clarification issued to the operators.

Thanking You

Yours Sincerely,

Capt. C.S. Randhawa
President – F.I.P.

CC: Capt. Shweta Singh, CFOI, DGCA.

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