



FEDERATION OF INDIAN PILOTS

FIP/DGCA/25-13

02 December 2025

To,
Director General of Civil Aviation,
DGCA, Opp Safdarjung Airport,
Sri Aurobindo Marg,
New Delhi-110003

**SUBJECT: SUBMISSION OF DOCUMENTS – OMISSION OF CLAUSE 13.3
IN FDTL CAR REVISION 2 (26.03.2024)**

Dear Sir,

1. Reference is made to the meeting held on 24 November 2025, wherein the issues concerning the **Missing Consecutive Night Duty Transition** clause was raised by us. As discussed, we are formally submitting the supporting documents highlighting the discrepancy between Revision 1 (dated 08.01.2024) and Revision 2 (dated 26.03.2024) of the FDTL CAR.
2. We wish to bring to your kind attention the following:
 - a) In Revision 1 of the CAR (dated 08 January 2024), four clauses are listed under Paragraph 13 – Consecutive Night Operation:
 - i.13.1,
 - ii.13.2,
 - iii.13.3,
 - iv.13.4
 - b) Clause 13.3 in Rev 1 states that:

“Flight crew shall also not be detailed or undertake any duty between the hours of 0000 to 0600 hrs prior to utilizing the provisions of 13.1 above.”
 - c) In Revision 2 of the CAR (dated 26 March 2024), under the same Paragraph 13, only three clauses appear:
 - i.13.1,
 - ii.13.2,
 - iii.13.3
 - d) Here, the original Clause 13.4 of Rev 1 (transition rest requirement) appears as the new Clause 13.3 in Rev 2. The original Clause 13.3 of Rev 1 is entirely missing in Rev 2, and there is no revision mark (vertical



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line on the left margin) indicating deletion, as would normally be required for any regulatory change or removal.

e) Previous DGCA acknowledgement:

3. This very concern was also raised before DGCA during the meeting held on 25 October 2024, convened following the Hon'ble Delhi High Court order dated 24.10.2024 (Minutes of Meeting attached). The associations had specifically requested review of Paragraph 13.4 and related transitional rest provisions.
4. Therefore, we request the Inclusion of the omitted Rev 1 Clause 13.3 back into Revision 2 or further. Any clarifications may please be sought if necessary.

With Warmest Regards,

Capt. CS Randhawa
President
Federation of Indian Pilots (FIP)