

VOLUME 3 GENERAL TECHNICAL ADMINISTRATION**CHAPTER 33 CABIN SAFETY AND FLIGHT ATTENDANT MANAGEMENT****Section 4 Safety Assurance System: Flight Attendant Requirements**

NOTE: This section is related to Safety Assurance System (SAS) Elements 5.1.1 (OP), Training of Flight Attendants, 5.2.1 (OP), Crewmember Duties/Cabin Procedures and 5.2.4 (OP), Passenger Handling.

3-3511 NUMBER OF FLIGHT ATTENDANTS (F/A) REQUIRED AT STOPS WHERE PASSENGERS REMAIN ONBOARD, PART 121, §§ 121.391 AND 121.393. In 1985, John Cassady, Assistant Chief Counsel, International Law, Legislation, and Regulations Division (AGC-200) of the Federal Aviation Administration (FAA) issued a legal interpretation that stated that during the boarding and deplaning process, all of the F/As required by Title 14 of the Code of Federal Regulations (14 CFR) part 121, § 121.391(a) must be onboard the aircraft. During deplaning or boarding at all points, including an intermediate stop, the full FAA minimum F/A complement must be onboard. The only time the number may be reduced, per § 121.393(b) (formerly codified at § 121.391(a)(3)), is when all the remaining onboard passengers are continuing on to the next destination and at a time when no other passengers are deplaning or boarding. To view the most recent legal interpretation regarding this issue, go to http://www.faa.gov/about/office_org/headquarters_offices/agc/pol_adjudication/agc200/Interpretations/. It is the position of Flight Standards Service (AFS) that, pending any amendment to § 121.393, the current regulations require the following:

A. Boarding and Deplaning. During the passenger boarding and deplaning phase on each flight, all of the F/As required by § 121.391(a) must be onboard the airplane.

B. Intermediate Stop. During an intermediate stop where passengers remain onboard, the number of required F/As, or persons trained in emergency procedures as per § 121.393(b)(2), may be reduced according to § 121.393(b). However, during the deplaning and boarding phase at an intermediate stop where passengers remain onboard, all of the F/As required by § 121.391(a) must be onboard the airplane.

3-3512 DISTRIBUTION OF F/As. Part 121 stipulates that F/As must be uniformly distributed throughout the operation of the flight. This includes when the aircraft is in-flight, parked at the gate, moving on the surface, taking off, and landing. The most important part of this requirement pertains to placing F/As in locations that will provide the most effective egress of passengers in the event of an emergency evacuation.

A. Purpose. The purpose of this requirement is to avoid having several F/As assigned to a sparsely occupied compartment when most of the passengers are grouped in another compartment having only one F/A.

B. Required Placement. Information regarding the required placement of F/As for takeoff and landing for an aircraft can be found in either the Type Certificate Data Sheet (TCDS) or the Flight Standardization Board (FSB) report. For example, those documents require the stationing of F/As at both the 3L and 3R positions on the McDonnell Douglas DC-10 and

McDonnell Douglas MD-11 aircraft. Principal operations inspectors (POI) may assist air carriers in obtaining this information by contacting the appropriate Aircraft Evaluation Group (AEG).

C. Change of Location. The POI should not approve a change to the location of required F/A stations reflected in the TCDSs without the following actions:

1) Carefully analyzing the “request for a change” in order to determine that the assigned evacuation duties of the F/As will meet the provisions of part 121. Consideration to change the location of the required F/A stations should be based on changes in the cabin configuration such as number of seats, location of galleys, or F/A duties.

2) Consulting with the appropriate AEG should establish the reason for the location of the required F/A stations. In some aircraft, this location is quite critical while in others it may make little or no difference.

3) Considering if a partial evacuation demonstration, as required by part 121, is necessary.

3-3513 DUTY ASSIGNMENT OF REQUIRED AND NONREQUIRED F/As. Part 121 requires that, during taxi, the F/A complement required by § 121.391 remain at their duty stations with safety belts and shoulder harnesses fastened, except to perform duties related to the safety of the aircraft and its occupants. All F/As, even those in excess of the minimum crew complement, must keep their safety belts and shoulder harnesses fastened unless the F/A is performing duties related to the safety of the airplane and its occupants. These duties may include:

- Safety briefings,
- Compliance checks of seat belt fastening,
- Conducting passenger briefings,
- Ensuring passenger compliance with stowage of the food and beverage tray,
- Ensuring passenger compliance with the seatbelt and no smoking placards/lights,
- Checking for the proper stowage of carry-on baggage,
- Attending distressed passengers, or
- Responding to emergency situations.

NOTE: Because the pertinent regulation states that only required F/As may get up to perform safety-related duties, technically those in excess of the required number were not able to get up during aircraft movement. AFS has granted a petition for exemption that allows all F/As to perform safety-related duties during movement on the surface when the number of F/As aboard a particular flight exceeds the number required by part 121. To view this exemption, go to the FAA’s Automated Exemption System (AES) at <http://aes.faa.gov> and type “5533” in the blank “Exemption/Docket No.” field.

A. Minimum F/A Requirement. Part 121 states the requirements used to determine the minimum number of F/As for each passenger-carrying airplane operated by an air carrier.

B. F/A Training. The F/As who make up the minimum complement, specified in the air carrier's operations specifications (OpSpecs), must be fully trained in accordance with part 121 subpart N and qualified on that type airplane in accordance with part 121 subpart O.

1) Some air carriers may use only the minimum number of F/As, while others occasionally or frequently use F/As in excess of the number required. In accordance with § 121.392, any person identified by the air carrier as an F/A on an aircraft must be trained and qualified in accordance with part 121 subparts N and O. This includes F/As in excess of the number required by § 121.391(a) and when F/As are not required by § 121.391(a).

2) An F/A in the process of meeting Operating Experience (OE) requirements is not qualified and cannot be used as a "required" F/A. Section 121.434(e) states, in part, "flight attendants receiving operating experience may not be assigned as a required crewmember." In accordance with § 121.392(b), a qualifying F/A who is receiving OE must be identified to passengers as a qualifying F/A. Air carriers may determine how they want to identify these individuals to passengers, as appropriate for their operation. Some possible methods would be to differentiate their uniform from that of a fully qualified F/A, identify F/As in training as "trainees" via nametags, or to make an announcement to passengers before the aircraft pushes back from the gate.

C. Required F/As. Part 121 does not require the use of extra or nonrequired F/As. The capability to handle emergency situations and emergency evacuations is based on the complement of required F/As. The duties assigned to the required complement of F/As must be realistic, be capable of being practically accomplished, and take into account the possible incapacitation of an individual crewmember.

D. Additional F/As. If an air carrier uses more trained and qualified F/As than are required by part 121, then the air carrier should have a procedure whereby the F/As required to fulfill the regulatory requirements are appropriately assigned. The extra F/As need to be identified.

E. Distribution of Extra F/As. The air carrier should evenly distribute extra F/As. The air carrier's manual should contain procedures which identify the required and nonrequired F/As. The air carrier should not assign duties to the extra F/As who would mandate their presence and duty assignment in the event of an emergency situation, such as an evacuation.

3-3514 USE OF NON-F/A PERSONNEL IN AIRCRAFT CABINS. U.S. air carriers periodically use company employees in the cabins of its aircraft for the purpose of conducting certain passenger service activities, such as serving beverages, conducting customer relations, or acting as translators. These persons are not assigned to flights to perform safety duties. These company employees are not acting in the capacity of an F/A nor are they, in general, trained or qualified to act as a F/A. The regulations do not prohibit the use of non-F/A personnel by an air carrier. However, their presence could conceivably interfere with the F/As if they were not properly instructed. The following guidance should be considered when non-F/A personnel are used by an air carrier.

A. Status of Non-F/A Personnel. Air carriers may use these individuals to perform activities limited to passenger service. They are a different category of cabin personnel and are not persons trained as F/As.

B. Applicable Regulations. Non-F/A personnel are subject to the same provisions of part 121 as passengers. For example, they must receive a pretakeoff briefing, must be seated for movement on the surface, takeoff, and landing, and must stow their carry-on baggage as required by part 121. They must also comply with the seatbelt requirements of part 121. They may not conduct any activities during movement on the surface.

C. Instruction. These individuals should receive enough instruction that they know what activities they may perform and equipment they may or may not operate so as not to interfere with the F/As. If they operate equipment they must carry the applicable parts of the F/A manual. The appropriate parts of the manual should provide enough information to ensure that they understand their duties and procedures, and to ensure that they do not interfere with the F/As' duties and procedures.

D. Assignment of Activities. The activities assigned to these individuals should be clearly distinguishable from the duties assigned to the F/A. They should not be permitted to operate any equipment or systems for which specific training is required by part 121 like electrical galley equipment, heating and ventilation controls for the cabin, and the public address (PA) system (except to perform language translator duties for passenger briefings).

E. Identification of Non-F/A Personnel. The air carrier may want to have these individuals distinguishable from the F/As. They can be distinguishable through the use of an identification card, a different uniform, or some other means.

RESERVED. Paragraphs 3-3515 through 3-3530.