205. AIR CARRIER OPERATIONS BULLETIN NO. 1-94-4

DUTY ASSIGNMENT OF REQUIRED AND NON-REQUIRED FLIGHT ATTENDANTS

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- a. Current regulations require that all flight attendants remain at their duty stations during taxi with safety belts and shoulder harnesses fastened except to perform duties related to the safety of the airplane and its occupants.
- b. It has come to our attention that some clarification may be needed as to who is a required flight attendant, who is an extra or non-required flight attendant, and what a safety related duty is. Sections 121.391(a) and (b) of the FAR set forth the requirements by which the minimum (and thus required) number of flight attendants are determined for each passenger-carrying airplane a certificate holder utilizes. These requirements are set forth in the certificate holder's operations specifications as required by FAR Section 121.391(c).
- c. The flight attendants who make up the minimum complement specified in the certificate holder's operations specifications must be fully trained in accordance with Subpart N of Part 121 of the FAR and qualified on that type airplane in accordance with Subpart O of Part 121 of the FAR.
 - (1) Some certificate holders utilize only the minimum number of flight attendants required by FAR Section 121.391 while other certificate holders occasionally or frequently utilize flight attendants in excess of those required by FAR Section 121.391. Except in the case described in paragraph (2), the extra flight attendants must be trained and qualified in accordance with Subparts N and O of Part 121 of the FAR.
 - (2) A flight attendant in the process of meeting the operating experience of FAR Section 121.434(e) would not yet be qualified and, thus, could not be utilized as part of the complement of required flight attendants as set forth in the certificate holder's operations specifications. This requirement is clearly stated in FAR Section 121.434(e) which states, in part, "flight attendants receiving operating experience may not be assigned as a required crewmember."
- d. Part 121 of the FAR does not require, or have provisions for, extra or non-required flight attendants. The capability to handle emergency situations, in general, and emergency evacuation, in particular, is based on the complement of required flight attendants. The duties assigned to the required complement of flight attendants must be realistic, capable of being practically accomplished, and take into account the possible incapacitation of an individual crewmember.

- e. If a certificate holder uses a complement of flight attendants that consists of more persons than are required by FAR Section 121.391 and all those flight attendants are trained and qualified for that airplane, then the certificate holder should have a procedure whereby the flight attendants required to fulfill the regulatory requirements are appropriately assigned and the extra flight attendants are identified as such. All flight attendants on a flight must, during movement on the surface, remain at their duty stations with safety belts and shoulder harnesses fastened except to perform safety related duties. Examples of safety related duties are:
 - (1) Conducting passenger briefings required by Sections 121.571 and 121.573 of the FAR.
 - (2) Assuring passenger compliance with the food and beverage tray requirements of FAR Section 121.577.
 - (3) Assuring passenger compliance with the seatbelt/no smoking requirements of FAR Section 121.317.
 - (4) Checking for the proper stowage of carry-on baggage as required by FAR Section 121.589.
- f. The extra flight attendants should be evenly distributed as desired by the certificate holder.
- g. Each principal operations inspector (POI) should review his or her assigned carrier's manual to ensure that the certificate holder has a procedure to inform flight attendants as to who is a required flight attendant and who is extra. Also, the certificate holder should not assign duties to the extra flight attendants in such a manner as to create a situation in which their presence and duty assignment would be necessary in the event of an emergency situation such as an evacuation.