



SAN FRANCISCO BAR PILOTS ASSOCIATION

Pier 9 East End
San Francisco, CA 94111

May 30, 2024

Commissioner Karen Tynan
President, CA Board of Pilot Commissioners

Via Email

Subject: SFBP Fatigue Risk Management System Document Submission

Dear Commissioner Tynan,

As per CCR, Title 7, 218.1, attached please find SFBP's Fatigue Risk Management System document. Over the past several years, the SFBP Fatigue Committee has put significant work and resources into the development of the FRMS, including retaining Circadian Technologies, a global leader in fatigue risk management solutions, to assist in development and review of the final work product to assure its effectiveness. Included in the FRMS is a letter from Circadian, detailing their review and endorsement.

Internally, SFBP adopted the FRMS guidelines on April 1, 2024, and has been working under them since that date. Concurrently, SFBP has been engaged with COE Solutions to provide additional programming services to our dispatch system to monitor pilot work/rest hours and generate the required BOPC reports. The programming is complicated and we are currently beta-testing the reports. Regarding the commencement of reporting to BOPC, the programming and reporting outcomes cannot be finalized until BOPC has formally approved the FRMS, as the guidance in the document drives the report generation criteria.

SFBP believes the FRMS to be a critical component in our fatigue mitigation efforts, one that ensures pilots can manage fatigue associated risk while maintaining the safe and efficient provision of pilotage service. We look forward to engaging in the BOPC review of the document.

Best regards,

A handwritten signature in blue ink that reads "John Carlier".

Capt. John Carlier
Port Agent