

Factual Report – Attachment 7

SFO Memorandum on Combining Positions During the Midnight Shift

AIR TRAFFIC CONTROL

DCA17IA148



Federal Aviation Administration

Memorandum

Date: 6/27/2018

To: NTSB

From: Mark J. Sherry, Support Specialist, SFO ATCT

Subject: Information request.

Per your request for information you asked: what were the factors that informed the decision on the combining of positions on the late shifts. The answer below is from the Operations Manager, Mark Paulus.

What factors were used to determine that 0015 would be an adequate time to combine the LC and GC positions?

This item was discussed immediately following the event with the Staff and SFO NATCA. It's important to remember that 0015 was determined to be the earliest that the positions could be combined. If traffic volume and complexity dictated, the positions would remain de-combined until such a time that it could be safely combined. We considered the following items when making the decision:

- **Normal traffic patterns**—At the time of the event, traffic and complexity generally subsided at approx 2345-0000 local. I believed that recuperative breaks could safely occur at 0015 if the traffic and complexity were low.
- **Runway Closures**—Following the event, the Airport Authority and Air Traffic agreed to move the beginning of the nightly construction period to no earlier than 0000. We believed that having at least 2 operational personnel in the Tower Cab as the nightly closures were being affected would provide additional oversight and increase safety.
- **Administrative duties**—I considered the advantage of having 2 operational employees in the Tower Cab during the time that several administrative duties are routinely performed.
- **NATCA CBA and Fatigue Guidance**—The NATCA/FAA CBA, Article 33 Position Rotation and Relief Periods, in addition to the NATCA/FAA Fatigue Mitigation Guidance were considered in making this decision. SFO Midshift employees begin work at 2230 local.

In consideration of traffic volume and complexity and the items mentioned above, I believed that combining positions no earlier than 0015 would provide safety to the operation and support the NATCA/FAA agreement on fatigue guidance.