

Notation 8316B

Member Rosekind, Dissenting:

By definition, this brief report is limited. However, fatigue was likely present at the time of the accident and fatigue-degraded performance likely contributed to the accident's occurrence. Despite substantial indications of fatigue effects, the present accident report fails to acknowledge fatigue's role in the accident.

First, the accident occurred at 3:05 a.m., during the window of circadian low that is scientifically well established as a period of reduced alertness and performance, and increased errors, incidents and accidents. The recent NTSB report on the Lubbock, TX aviation accident addresses these issues in greater detail.¹ The same physiological fatigue risk factors identified as contributory in the Lubbock, TX aviation accident are present in this accident and similar fatigue-degraded performance was manifested.

Second, the accident occurred on the captain's fourth and the copilot's third consecutive night on duty. Night work requires the need for day sleep which typically results in acute sleep loss and cumulative sleep debt. As discussed in the Lubbock, TX aviation accident, NASA and other data show that individuals do not naturally adjust physiologically to night work. Also, at the time of the accident, the copilot had been on duty for more than 11 hours. Therefore, fatigue (as a result of acute sleep loss, a cumulative sleep debt, and circadian low) was likely present and affecting both pilots' performance at the time of the accident.

Third, fatigue degraded performance that was likely contributory or causal in the accident included reduced attention or vigilance (i.e. like the captain's failure to monitor airspeed) and incorrect decisions/actions (i.e. retarding propeller levers or feathering the propellers).

Finally, Quest Diagnostics has a history of pilots operating aircraft for extended periods of time. Specifically, fatigue was identified as a contributing factor to the Blain, PA accident on September 3, 1994. The Flight Safety Foundation also made a specific finding in their safety audit stating that Quest pilots operate excessive flight hours.

The present report neglects to acknowledge and analyze the above fatigue factors and therefore fails to acknowledge the role of fatigue in this accident. Based on the factors identified above, fatigue was a likely contributory cause to the accident.

¹ *Crash During Approach to Landing Empire Airlines Flight 8284*, Lubbock Texas, January 27, 2009, NTSB/AAR-11/02, pp. 65-69.