



August 4, 2020

Mr. Edward Jackson
Principal Operations Inspector
Baltimore Flight Standards District Office
1302 Concourse Drive
Linthicum Heights, MD 21090

Re: Revised Plan – Exemption 18511B

Inspector Jackson,

Below is our revised plan for application of FAA exemption 18511B in dispatcher training.

OCC Plan to extend exemption 18511 to July 31, 2020

This document outlines the dispatch departments plan to extend exemption 18511 from May 31, 2020 to July 31, 2020. In accordance with exemption 18511 the OCC conducted a Safety Risk Assessment¹ on March 31, 2020 to extend the grace period required for recurrent training from one month to three months. The recurrent training included was:

1. Recurrent Ground School
2. Competency check
3. CRM/DRM
4. Operational Familiarization

A dispatcher is required to conduct these recurrent events to maintain proficiency. This requirement is described in the Dispatch Training Manual². In accordance with 14 CFR 121.401(b) a dispatcher may take one, or more, of these events a month later than the month it was due, provided it is treated as if the event occurred in the month it was due. Due to the COVID-19 pandemic, the FAA issued Exemption 18511 which enabled 14 CFR Part 119 carriers to utilize three grace months for recurrent training as opposed to the normal one. This exemption was originally intended to expire on May 31, 2020. To date, the dispatch department has used this exemption multiple times and has not experienced any reduction in the proficiency of the dispatch team.

In the letter dated May 29 2020³ the FAA extends the termination date of exemption 18511 to July 31, 2020⁴. Piedmont Airlines intends to use these grace months for dispatchers who have recurrent training due in the months of June and July 2020. Dispatchers who conduct recurrent training in a grace month will be considered to have taken the training in the month it was due.

The tracking of these training events will continue to occur in the Learning Hub software.

¹ PDT 20032701

² DTM Chapter 11

³ FAA 2020 0308

⁴ July 31, 2020 is the due date; a dispatcher may extend training three months through October 31, 2020