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**Federal Aviation  
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# InFO

Information for Operators

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Flight Standards Service  
Washington, DC

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*An InFO contains valuable information for operators that should help them meet certain administrative, regulatory, or operational requirements with relatively low urgency or impact on safety.*

**Subject:** Flight Planning Responsibilities When Conducting Reduced Vertical Separation Minimum (RVSM) Operations

**Purpose:** This InFO emphasizes RVSM flight planning guidance which states “If either the operator or the aircraft or both have not received RVSM authorization (non-RVSM aircraft) the pilot will neither request nor accept a clearance into RVSM airspace...”

**Background:** Federal Aviation Administration (FAA) Air Traffic Control (ATC) reports numerous instances of pilots requesting RVSM flight levels or cruising in RVSM airspace without required authorization and/or not using proper phraseology and flight plan filing practices as guided in the Aeronautical Information Manual (AIM). In the first 15 days of November 2011, 35 Instrument Flight Rules (IFR) operations were filed incorrectly. These events indicate that not only are “non-RVSM” aircraft being filed as RVSM authorized, but also, authorized aircraft unable to conduct RVSM due to equipment malfunctions (operations in accordance with an MEL item) are being incorrectly filed as RVSM authorized. Flight plans are also being filed with an RVSM equipment/capability qualifier while simultaneously annotating a contradictory entry (e.g. NON-RVSM) in the “Remarks” section.

**Discussion:** Title 14 of the Code of Federal Regulations (14 CFR) Part 91, § 91.180 and Appendix G cover RVSM requirements and designate exclusionary domestic RVSM airspace (FL 290-410). With limited exceptions, all operators and individual aircraft must have RVSM authorization and RVSM authorized aircraft must have all RVSM equipment operable to operate at RVSM altitudes. An operator annotates the equipment block of the FAA or International Civil Aviation Organization (ICAO) flight plan with an equipment/capability qualifier indicating RVSM capability only after it has been determined that both the operator and its aircraft are RVSM-compliant and issued RVSM authorization. An aircraft or operator not authorized for RVSM operation or an operator/aircraft without operable RVSM equipment is referred to as “non-RVSM.”

RVSM guidance is also included in FAA Advisory Circular (AC) 91-85, Authorization of Aircraft and Operators for Flight in RVSM Airspace, and in AIM, Section 4-6, Policy/Procedures for RVSM in the Domestic U.S., Alaska, Offshore Airspace and the San Juan FIR. Pay special attention to AIM Sections 4-6-4, Flight Planning into RVSM Airspace; 4-6-5, Pilot RVSM Operating Practices and Procedures; and 4-6-10, Procedures for Accommodation of Non-RVSM Aircraft. Basic Pilot RVSM Operating Practices and Procedures stipulate if either the operator and/or aircraft has not received RVSM authorization or an operator/aircraft does not have operable RVSM equipment, the pilot will neither request nor accept a

clearance into RVSM airspace except when using procedures found in AIM, Section 4-6-10. Guidance material can be found at:

- [http://www.faa.gov/about/office\\_org/headquarters\\_offices/ato/service\\_units/enroute/rvsm/documents/AC91\\_85.pdf](http://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/enroute/rvsm/documents/AC91_85.pdf); and
- [http://www.faa.gov/air\\_traffic/publications/ATpubs/AIM/Chap4/aim0406.html](http://www.faa.gov/air_traffic/publications/ATpubs/AIM/Chap4/aim0406.html).

Non-RVSM aircraft must not file a flight plan with an RVSM equipment/capability qualifier (i.e. W for ICAO flight plan or /Q, /W, /L, or /K for an FAA flight plan). When an erroneous RVSM equipment/capability qualifier is included, ATC automation will not alert the controller to provide required 2000' vertical separation for the Non-RVSM aircraft.

**Recommended Action:** Program Managers, Directors of Operations, Directors of Safety, Pilots, dispatchers, flight planning services and flight followers should review the AIM guidance regarding RVSM airspace.

1. Be knowledgeable of flight planning requirements and do not file an RVSM equipment/capability qualifier unless authorized and capable of operations into RVSM airspace.
2. Operators should understand and comply with the MEL guidance for inoperative items that disqualify an aircraft from RVSM airspace operations.
3. Do not request accommodation for non-RVSM operations in RVSM airspace unless meeting one of the permitted exceptions documented in AIM Section 4-6-10. If accommodated, use proper phraseology and never indicate RVSM capability in the equipment and capabilities field.
4. Pilots should remember that regardless of who files the flight plan; the PIC is responsible for operating within § 91.180 including correct flight plan filing.

**Contact:** Questions or comments regarding this InFO should be directed to Trent Bigler, Aviation Safety Inspector, AFS-470 at (202) 385-4504.