

## **AIR TRAFFIC PROCEDURES ADVISORY COMMITTEE**

**(ATPAC)**

**SUBJECT:** Minutes of the 127th Meeting

**SUMMARY.** The 127th meeting of ATPAC was held at CGH Corporate Headquarters, Eighth Floor Training Room, 600 Maryland Avenue, Washington, DC, on April 10, 11, and 12, 2007. Representatives were present from FAA, ALPA, AOPA, ATCA, APA, COA, NASA, NATCA, NBAA, PWC, and US Navy. The meeting was called to order by Wilson Riggan, Chairman, at 9:00 a.m. on Tuesday, April 10, 2007. ATPAC 126 minutes were discussed and approved subject to the inclusion of complete AOC listings. The Executive Director's report was presented by Ms. Nancy Kalinowski, which addressed the status of the existing AOCs, the ATPAC Website, and the search for a new COO. Two new areas of concern (AOC) and no Safety Items were submitted for consideration. There were four presentations scheduled.

Presentations/Updates were made by Mr. Steve Lang, RNAV/RNP Office, Ms. LaGretta Bowser, Runway Safety Office, Dr. Ralf H. Mayer on RNAV benefits at ATL and DFW, and Mr. Alan Jones regarding the SMS components of the POFZ decision-making. Mr. Wes Stoops was presented with the Randy Nutt Award by Ms. Sabra Kaulia, ATCA for his service to ATPAC as the former NATCA Representative.

### **AGENDA.**

- Call to Order/Roll Call
- Recognition of attendees
- Review/Approval of Minutes of the 126th ATPAC Meeting
- Call for Safety Items
- Executive Director's Report
  - Review of DCPs
  - IOUs
- Review of Areas of Concern
- Presentation of the Randy Nutt Award to Wes Stoops
- Adjournment

**CALL TO ORDER.** The Chairman, Mr. Wilson Riggan, called the meeting to order at 9:00 a.m. on Tuesday, April 10, 2007, at CGH Corporate Headquarters, Eighth Floor Training Room, 600 Maryland Avenue, Washington, DC. Representatives were present from FAA, ALPA, AOPA, ATCA, APA, NASA, COA, NATCA, NBAA, PWC, and USN.

The following persons were in attendance or visited during the three-day meeting:

Wilson Riggan, APA, Chairman  
Nancy Kalinowski, Executive Director, FAA, ATO-R  
John Timmerman, FAA, ATO-R

Steve Alogna, Contract Support, FAA, ATO-R  
Harvey Hartmann, NASA/ASRS  
Harry Hodges, FAA  
David Young, FAA  
Sabra Kaulia, ATCA  
Glenn Morse, COA  
Scott Proudfoot, NATCA  
David Rivers, NBAA  
Bob Streigel, ALPA  
Heidi Williams, AOPA  
Jesse Gaines, FAA  
Ben Grimes, FAA  
Randy Davenport, APA  
Ray Lewis, USN  
Brett Easler, USN  
Cynthia Deyoe, PWC  
Gaines, Jesse, FAA  
Jim Arrighi, FAA  
Wes Stoops, Former NATCA representative to ATPAC  
Wes Smith, SAIC  
John Swaggert, FAA  
Rich Jehlen, FAA  
Alan Jones, FAA

**REVIEW/APPROVAL OF MINUTES OF THE 125th MEETING.**

ATPAC 126 minutes were discussed and approved subject to the inclusion of a complete listing of original AOCs in future minutes.

**INTRODUCTION OF SAFEY ITEMS.**

None were introduced.

**EXECUTIVE DIRECTOR'S REPORT**

Ms. Nancy Kalinowski, Executive Director, presented the report which addressed the status of the ATPAC Website and the search for a new COO.

**INTRODUCTION OF NEW AREAS OF CONCERN (AOC).**

One new AOC was accepted.

AOC 127-1 ABBREVIATED DEPARTURE CLEARANCES (CLEARED AS FILED)

One proposed AOC regarding ATC services landing LAX was not considered due to time constraints.

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## ATPAC UPDATE

### AREA OF CONCERN 93-6

10/5/98

**SAFETY ITEM: NO**

#### **SUBJECT: Runway Incursions by Taxiing Aircraft**

**DISCUSSION:** In response to the upward trend in runway incursions, a RE&D Subcommittee was tasked with developing recommendations to address this upward incursion trend.

At ATPAC 91, we were briefed on the RE&D recommendation that the FAA “expeditiously amend FAR 91.129(i) to require a specific ATC clearance to cross any runway.” The FAA has indicated that this rule change will be a long, slow process. Furthermore, despite the urgency of the recommendation, the FAA has not taken any action on this item.

**SUGGESTED ATPAC ACTION:** Until such time that the FAA changes 91.129(i) and, as an interim measure, ATPAC should recommend that the taxiing aircraft to hold short for positive clearance to taxi across all runways.

**93**—AOC deferred pending additional discussion.

**94**—Executive Director provided an overview of the AOC. The recommendation to update the FAR is being reviewed. Question raised regarding the status of the Runway JSAT. Joint commercial and general aviation JSAT is being established. The JSAT is planned for February. Joint commercial and general aviation JSAT is being established. A MITRE model at Midway (Chicago) is currently being developed. Completion is targeted for end of summer/beginning of fall. Suggestion to have MITRE provide a briefing to the committee at the next meeting regarding parameters for the model.

**95**—Status update was provided by Sue O’Brien, Runway Safety Program Manager, ATO-102. AOC deferred pending testing in Long Beach. Update will be provided in July.

**96**—Executive Director provided status update of Long Beach testing. Further updates will be provided at the next meeting. Discussion centered on why ATPAC has not made a formal recommendation regarding this AOC. Other members stated that a recommendation may not bring about a solution. Suggestion made to wait for the results of the Long Beach testing. One member stated that there is a significant difference between the test and the FAR change. Copy of test plan will be provided at the next meeting. Once the committee hears further test results and reviews the test plan a decision will be made whether to pursue the concern further.

**97**—Runway Safety Program Manager, Sue O'Brien, ATP-20, and Staff Specialist, Del Meadows, briefed the committee. A copy of MITRE Report (test plan), Taxi Hold-Short Procedure, was distributed to the committee, as requested. Lighting issues discussed. There was a comparison of U.K. lighting procedures versus procedures in the States. An update of the Long Beach testing will be provided in January.

**98**—The Long Beach Test has been delayed due to issues with pilots, unions, and the airport manager. No action has been taken since the October 1999 meeting. A briefing will be provided to the committee at the April 2000 meeting.

**99**—Update provided by Del Meadows, ATP-20. A question was raised that if the FAR was changed, why not change the 7210.3 to be incorporated into a facility's operation manual. The result of changing the FAR or writing procedure will only make a small difference. JSAT will analyze data and come up with strategies and will determine which ideas will be implemented with a JSIT.

**100**—Denny Lawson, ATS-20, provided a program status update. Since the last meeting, a workshop with all 9 regions and a symposium in which the users were invited had been held.

**101**—Steve Shaffer, ATS-20, informed the committee of the current initiatives being addressed by the Runway Safety Program Office. The issue has been introduced at the JSIT. AOC will be deferred pending updates in January.

**102**—ATS-20 provided a briefing paper to the committee. Points discussed were:

- Amending FAR 91.125(I).
- Enhanced operational tower controller training.
- Memory enhancement techniques training for tower controllers.
- Pilot/Controller communication phraseology review.
- Air traffic teamwork enhancement (ATTE) training.
- NOTAM system improvement.

**103**—Steve Shaffer, ATS-20, provided a status briefing to the committee. Air Traffic is responsible for Enhanced Tower Control Training and OJT for Controllers. Flight Standards is responsible for Education and Awareness of Airport and Vehicle Operators. AC Runway 121 & 125 is currently on the Federal Register for comment. Foreign Pilot Training in compliance with ICAO Standards is scheduled to be completed in the 2002 timeframe.

A meeting was held w/ATP and AFS regarding the FAR that was the original concern of this AOC. Runway Safety JSAT forwarded the issue to the JSIT and it remains on the top 10 list.

**RECOMMENDATION #1: ATPAC remains concerned that the runway incursion rate continues to increase. ATPAC urges the FAA to expedite the process to change FAR 91.129i to require a specific ATC clearance to cross any runway as recommended by the runway incursion RE&D committee and the NTSB.**

Vote taken and recommendation adopted.

**104**—The Executive Director reported that the Office of Runway Safety has committed funds in FY02 for modeling of the procedure to require a specific ATC clearance to cross any runway. The evaluation will specifically target the issues of airport capacity, safety, controller workload, efficiency, and frequency congestion. ATP is in the process of developing a test plan that will address every conceivable scenario. A decision based on the results of the evaluation should be available by December 2001. Status update will be reported in October.

**105**—ARI briefing given by Mike Lenz. Expect testing to begin in first quarter of calendar year 2002, possibly at NASA Ames, funding secured by ARI. Will look at controllers for the facilities being simulated, to participate. Have chosen a few airports to look at with a lot of crossing taxiways and runways, but not necessarily the busiest. Decision made collaboratively between ATP, ARI, and NATCA. Test plan has not been completed due to other priorities.

Launching some initiatives related to 91.129i. Methodology to do simulations, review studies, look at ATC procedures associated with TIPH. Approximately 10 airports brought up that would likely lend themselves to this type of operations. MITRE developed and published a test plan a few years. Goal is to develop and conduct work to have a report for Runway Safety Summit in August 2002.

**106**—ARI briefing by Mike Lenz. Working on risk assessment and analysis looking at “taxi to,” taxi into position and hold (TIPH), and multiple landing clearances to identify hazards and manage the risks associated with selected procedures. Analyzing data for last 3 years. Not a lot of information available on multiple landing clearances. Will be using TAAM model in analysis. Model will run traffic as you program it, but will not tell you how many errors.

Will accept any input from industry. It was suggested that it would be interesting to look at international standards for the procedures, but it was brought up that the total number of flights is less in Europe and there are language differences as well. It was also suggested to get industry more directly involved in the analysis.

**107**—ARI briefing provided by Mike Lenz. Talked about the risk assessment and analysis work dealing with 91.129, TIPH and multiple landing clearances. The final report is due May 31, 2002.



**108**—Due to a scheduling conflict, no briefing was available at this meeting. Update will be provided at meeting 109.

**109**—Status update provided by Mike Lenz of the Runway Safety Office. Background information regarding NTSB and Runway Incursion JSAT recommendations were discussed. Copy of briefing provided to members.

ADSYSTECH provided the committee with a briefing regarding the status of TIPH operation Risk Assessment.

Update will be provided at the next meeting.

**110**—The Executive Director read the status update provided by the Office of Runway Safety. The test at NASA Ames has been discontinued. An analysis will be performed beginning with benchmark OEP airports. The TIPH risk analysis is expected to be completed in FY 2003.

**111**—Mike Lenz briefed the committee. Talked about how the risk assessment for TIPH was being conducted and what results had been seen to date. A recommendation on TIPH will be forthcoming.

**112**—91.129i verbiage read to the committee. Question regarding why a risk assessment will not be done on 91.129 issues. A number of workgroups have been addressing the issue of 91.129i. One solution would increase frequency usage. Comment made, this addresses taxiing, but not the runway that you land on. There is a problem with the wording. The evaluation of the paragraph needs to be reviewed. The interpretation is unclear. AIM paragraph needs to be revised.

**113**—Briefed by Mike Lenz, ARI. Discussed risk assessment and analysis process for TIPH, 91.129, and multiple landing clearances. Talked about Runway Status Light concept.

Analysis for 91.129 is on-going. This includes a questionnaire for facilities.

[PowerPoint presentation is available on the website].

**114**—Runway Safety has comments from ATPAC and NTSB and are still conducting their analysis. They will have more information at the April Meeting.

**115**—LaGretta Bowser, ATO-R, briefed the committee. Currently a survey of all ATCTs is being conducted regarding 91.129. Additional input/feedback is being requested from any interested user group. The analysis done so far does not support change. AT and AF will make the final decision. A copy of the report was requested.

**116**—The ATO-R representative was unable to attend the meeting. A briefing will be provided at the next meeting.

**117**—Briefing from LaGretta Bower, ATO-R. All air traffic facilities surveyed. Varied responses from no impact to extensive impact. Analysis shows the only a few incursions are due to 91.129.

Consensus reached that amending 91.129 would not change much. The Committee decided to withdraw Recommendation #1. Update will be provided in January.

**118**—The following was provided by LaGretta Bowser, ATO-S, for briefing to the committee:

A draft final report is complete. A copy will be forwarded to the committee no later than 3/31/05. An update will be available at the next meeting in April.

**119**—The ATO-S representative was unable to attend the meeting, but provided the following information.

Air traffic has requested ATO-S to expand the criteria used in the analysis for 91129i. Work is continuing and a copy of the final report will be forwarded and the response to the NTSB will be forwarded when complete.

**120**—LaGretta Bowser (ATO-S) briefed the committee. Workgroup has completed analysis on events from 1998 through April 2005. Of 1366 runway events examined, 28 events found of which only a small subset was 91.129. The NTSB did not completely agree with the findings because of the criteria used.

ATO-S is continuing to work the recommendation and will brief the Vice President's for AF (Davis) and AT (Johnson) prior to the October meeting. The options will be full rulemaking (2-5 years) or nothing at all.

**121**--LaGretta Bowser (ATO-S) briefed the committee. Air Traffic has been briefed on the findings concerning 91.129. Options are for rulemaking or to do nothing at all. No response on the direction of this issue has been received. The NTSB has not changed their position on this issue.

**122**--LaGretta Bowser (ATO-S) briefed the committee. No decision has been made regarding rulemaking. Has a complete safety case been made for changing the FAR? ATO-S representative does not think so. Input requested. Can we mitigate the risk? Can we manage without changing the FAR? ASRS reports indicate that "site specific" signage could help alleviate problems such as this.

**123**-- LaGretta Bowser (ATO-S) briefed the committee. Safety risk mitigation (SRMD) needs to be completed.

**124--** LaGretta Bowser (ATO-S) could not attend this meeting and will be scheduled to brief during 125.

**125** – LaGretta Bowser briefed that the SRMD should begin 120-days after the anticipated “Line Up and Wait” DCP is issued possibly in April 2007.

**126** – It was agreed that Ms. Bowser will be asked to update the committee at 127.

**127** – Ms. Bowser briefed the committee on “taxi to.” This issue could be completed by the end of this year as many issues are resource driven. “Line up and wait” data is not being shared between the US and ICAO so our decision will not be based on harmonization. The US is the last holdout on “taxi to.” She advised that when we go to the ICAO adaptation of standards for runway incursions our incidence will go from 330 to 1400 using the new reporting criteria. She also advised that the decision regarding these changes may end up being political vice safety based on ICAOP compatibility efforts.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1:** ATPAC remains concerned that the runway incursion rate continues to increase. ATPAC urges the FAA to expedite the process to change FAR 91.129i to require a specific ATC clearance to cross any runway as recommended by the runway incursion RE&D committee and the NTSB.

**IOU:** LaGretta Bowser, if applicable, will be asked to update the committee at meeting #128.

## ATPAC UPDATE

### AREA OF CONCERN 102-2

1/24/2001

SAFETY: No

#### **SUBJECT: Instrument Approach Clearances to Other than IAF**

**DISCUSSION:** ALPA is still receiving reports that ATC is clearing aircraft direct to intermediate or final approach fixes, and then expecting aircraft to execute a straight-in instrument approach procedure (“IAP”). In fact, with the proliferation of RNAV/GPS IAPs this practice appears to be on the increase.

The instrument approach procedure design criteria do not account for descent gradient or course change factors that occur when aircraft begin an instrument approach procedure on an ad hoc basis. The only exception to beginning an IAP at an IAF is where vectors to the “final approach course” (in accordance with 7110.65, 5-9-1) place the aircraft in the proper position to do a straight-in approach.

When an aircraft is not vectored in accordance with 5-9-1, the aircraft must be cleared over an IAF (or simply “cleared approach” to leave the pilot free at remote locations to do the procedure as required by AIM directives, etc.). Controllers need to be reminded that arrival over an IAF that is not approved on the face of the procedure for “NoPT” requires the pilot to do a course reversal.

The requirements set for in 7110.65, 4-8-1, are intended to apply to all IAP clearances, except for those conducted specifically under the provisions of 5-9-1. In recent discussions with ATP-100 staff, ALPA has learned that some quarters within Air Traffic Services consider Chapter 4 of 7110.65 to apply only to non-radar operations, rather than being the chapter that is the foundation for all IFR operations. Either this needs to be cleared up, or the language of 4-8-1 needs to be restated in Chapter 5.

Further, the language in 4-8-1 that refers to the intermediate fix is confusing, ambiguous, leads to endless speculation, and serves no valid operational purpose.

As protected airspace areas are reduced in RNAV and emerging RNP IAPs, bypassing a designated IAF increases the risk of an aircraft leaving protected airspace and colliding with an obstacle, in addition to the risks of violating turning and descent gradient requirements.

Also, ALPA understands that some controllers believe that the intent of 5-9-1 is satisfied by a clearance direct to an intermediate or final approach fix, followed by a “radar

monitor.” This is incorrect as it negates the requirement to intercept final at not more than a 20-30 degree angle, and at the appropriate minimum distance from the approach gate.

**SUGGESTED ATPAC ACTION:** A training bulletin be issued to all controllers reviewing the intended requirements of 7110-65, 4-8-1. This would include a reminder that this paragraph applies to all IAP clearances except for vectors provided in accordance with 5-9-1. Further, a reminder that the “intent” of 5-9-1 is not satisfied by simply clearing an aircraft directly to an intermediate or final approach fix, then merely observing the aircraft on radar. Finally, a reminder that a clearance for an IAP over an IAF that is not approved for “NoPT” on the face of the chart will require the pilot to execute the prescribed course reversal, thus ATC separation services should be provided with that expectation in mind.

In 4-8-1 the present language “Standard Instrument Approach Procedures shall commence at an Initial Approach Fix or an Intermediate Approach Fix if there is not an Initial Approach Fix...” should be amended to delete reference to the phrase “Intermediate Approach Fix.” The only time an approach should begin at an intermediate approach fix is where vectors in accordance with 5-9-1 have been onto the approach course outside of the intermediate fix on a “radar required” IAP that has no IAF’s.

(See related agenda item “Vectors to the IAP Course Prior to a Published Segment”). Finally, 4-8-1 should have language that makes it absolutely clear that the provisions of this paragraph apply in both a radar and non-radar environment, excepting only radar vectors provided in accordance with 5-9-1.

**102**—Wally Roberts, ALPA, presented the AOC including a November 2000 letter from ALPA to the FAA, which expressed the concern. Executive Director reported that the FAA has drafted a response to the letter and that it is currently in coordination. The committee opted to wait for the FAA’s response.

**103**—Deferred for discussion at next meeting.

**104**—Wally Roberts provided an update to the committee. Concerns were raised regarding the confusion of mixing procedural notes and system requirement (equipment) notes. Additional wording was suggested to distinguish equipment vs. procedure note. ATP and AFS need to jointly work the issue.

**RECOMMENDATION #1:** Form a FAA workgroup comprised of AFS, AVN, AAT, NATCA, and ALPA to work the issue and provide solutions to the problem.

Flight Standards will take the lead to make this happen.

The Flight Standards representative provided a brief overview of the issue. This is not a site-specific issue and controllers are doing the best with what they have. AVN and AFS will work together with the controllers to determine criteria for TERPS and the impact. A

specific fix should not be targeted. Flight Standards takes the responsibility and commitment to work and explore the issue.

**105**—Meeting with Wally and AFS to discuss issues has not yet occurred. After the meeting occurs, there will be a decision as to whether or not a workgroup should be formed. Request to review list of attendees and ensure that the proper attendees are there to obtain the desired results/outcome. Will try to have meeting in conjunction with the charting forum.

**106**—Did not get discussed at the past charting forum. AFS will try to get the parties together before the April meeting.

**107**—The Flight Standards representative was unable to attend meeting 107. The AOC will be updated at the July meeting.

**108**—FAA has had some internal discussions, but has had some difficulty getting all parties on the phone. Don Porter and Bruce Tarbert, ATP-104, briefed the committee on this AOC. DCP and CBI training are being edited to address GPS equipment and T approach issues. CBI training is targeted for release in September. Product will be presented for review in January and possible implementation in June/July 2003 timeframe.

**109**—Bruce Tarbert, ATP-104, briefed the committee. DCP's have been finalized and signed. Training is expected to be out in April 2003, which will include TAA's. Consideration was given to distances from IAF and intercept angle. AVN looking to see if additional guidance regarding speed is required.

**110**—A Draft DCP was submitted to committee for review. A question was raised regarding the "IF (IAF)" notation on the diagram. A briefing will be provided at the next meeting to clarify the concerns.

**111**—Some work has been done within Flight Standards, but there has not been a meeting of all the appropriate parties.

**112**—AFS-420 workgroup has been formed to write-up a plan and proposed guidance. Development of a controller and pilot training initiative will be addressed. Workgroup's progress will be reported at the next meeting.

**113**—AFS representative was unable to attend the meeting and provide an update. Question was raised whether the charting forum was working this issue.

**114**—AFS representative was unable to attend the meeting and provide an update.

**115**—AFS representative was unable to attend the meeting and provide an update.

**116**—AFS representative was unable to attend the meeting and provide an update.

117—New AFS representative at this meeting. Draft DCP for the AOC has been written. An update will be provided in January.

118—AFS was unable to attend the meeting, but indicated to the committee that a reenergized effort will be made on this AOC. The committee wanted to emphasize that there had been considerable work done on this AOC by AFS and that there should not be a need to start over again.

Committee wanted to reiterate its recommendations to AFS.

119—AFS brought up the issue before the Technical Review Board. A review of the ATO-W DCP for vectoring has been completed and was concurred with.

The committee requested for AFS to look at RNAV aircraft on the conventional side.

120—DCPs are scheduled for publication in February 2006. Question: Would it have application to conventional procedures? ATO-T would have to provide feedback.

**RECOMMENDATION #2: Determine/implement this type approach if it can be used by conventional aircraft.**

121—Clarify of Recommendation #2 was discussed and approved. It now reads:

**RECOMMENDATION #2 (Revised): Determine/implement this type approach if it can be used by RNAV aircraft on a conventional approach.**

ATO-T is still researching this issue with the RNAV office.

122—RNAVs have ability to go to other than designated IAF. Published for RNAV on RNAV approach. Our AOC asks whether it can also be for conventional approach. Can the aircraft also meet altitude of IAF? It is there for RNAV. Should also be there for conventional approach. Operationally, this gives the controller more flexibility, less workload, streamlines operations.

This should be presented to RNAV office. ATO-T will draft a DCP.

123 – ATO-T will research and put out appropriate on the recommendation.

124 – ATO-T (Madison) will follow-up on DCP to present to RNAV/RNP Office.

125 – Dave Madison advised that AFS-400 is looking into this AOC and is working the group's concerns. After group discussion, Harry Hodges, Flight Standards, agreed to follow-up and advise ATPAC of status.

**126** – Jeff Williams, RNAV/RNP Office, provided an explanation. Discussion at 127 will determine if this is sufficient to satisfy the AOC.

**127** – Harry Hodges gave his opinion that RNAV equipped aircraft may proceed to conventional intermediate fixes. Also discussed was describing the various levels of RNAV capabilities so that all RNAVs are not compatible to accomplish successful navigation during a conventional approach. Jeff Williams was non-committal as to the answer to the AOC but will look into the applications as would AFS-100. The consensus was that Jeff and David Madison should discuss and resolve.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #2 (Revised): Determine/implement this type approach if it can be used by RNAV aircraft on a conventional approach.**

**IOU: John Timmerman will invite the RNAV/RNP Office to attend future meetings.**



**ATPAC UPDATE**

**AREA OF CONCERN 105-3**

**10/12/2001**  
**SAFETY: No**

**SUBJECT: Cleanup of FAR's and AIM**

**DISCUSSION:** There is a possibility that several typos or actual errors exist in the government issued FAR's and/or AIM. It is requested that the appropriate FAA offices review the attached list, and if errors should be found, correct those errors at the earliest opportunity with the government printing office. In those cases where error is not found, an explanation should be forwarded to ATPAC for review

**SUGGESTED ATPAC ACTION:** Forward the attached to appropriate FAA office(s) for review and explanation.

**105**—There is a process mentioned in AIM for making changes.

**RECOMMENDATION #1: In accordance with suggestion ATPAC Action.**

**106**—No progress has been made on this AOC. Update at April meeting.

**107**—Due to resource constraints, Air Traffic does not have the personnel to conduct a thorough review and clean up of the AIM.

**108**—ATP will work on the specific AIM changes that were noted in the AOC when it was originally submitted.

**109**—DCP's are being prepared for AIM/AIP changes. Memorandums to appropriate offices regarding FAR changes are being processed.

**110**—DCP and FAR changes are in process.

**111**—DCP and FAR changes are in process.

**112**—DCP and FAR changes are in process.

**113**—DCP and FAR changes are in process.

**114**—DCP and FAR changes are in process.

**115**—DCP and FAR changes are in process. Draft changes regarding flight levels in Class G airspace was provided to the committee.

116—Changes continue to be processed.

117—DCP and FAR changes are in process.

118—DCP and FAR changes are in process.

119—Changes to AIM paragraph 3-3-1 concerning IFR altitudes in Class G airspace have been published. Additional DCP and FAR changes are in process.

120—DCP and FAR changes are in process.

121—DCP and FAR changes are in process.

122—DCP and FAR changes are in process. FARs transferred to ATO-R for processing.

123- ATO-R is investigating the remaining changes to the FARs and will report progress at the next meeting.

124 - ATO-R is investigating the remaining changes to the FARs and will report progress at the next meeting.

125 – This AOC contains recommended actions in the CFR regarding 14 CFR 91.126(d), 91.127(c), 91.155, 91.157 (b) (4), and the AIM. The Office of Airspace & Rules has addressed these items and the proposed resolution will be discussed at 126.

126 – Steve Alogna will determine the status of these items and report at 127.

127 – Steve Alogna will continue to track progress and report at 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION : Forward the attached to appropriate FAA office(s) for review and explanation.**

**IOU: ATO-R**

## ATPAC UPDATE

### AREA OF CONCERN 108-1

7/15/02  
SAFETY: No

**SUBJECT: ALPA Safety Concerns Regarding a Recent ICAO Phraseology Change to PANS-ATM (Line up and Wait)**

**DISCUSSION:** A recent editorial change to ICAO PANS ATM Chapter 12, 2.3.4.7 was made that changed taxi instructions from “Taxi to holding point (designation) [Runway designation]” to “Taxi to holding position (designation) [Runway designation].” It was recognized by ICAO that “holding point” is a point in the sky, while “holding position” is a point on the ground. In order to keep phraseology consistent, it was decided to change “holding point” to “holding position.”

This editorial change has unintended consequences. Specifically, FAA policy to use “Taxi in position and hold” will set a human factors trap for US pilots operating at foreign airports since “Taxi to holding position (ICAO)” sounds an awful lot like “Taxi in position and hold.” This is a runway incursion waiting to happen.

Additionally, foreign pilots may misunderstand FAA ATC instructions that involve the phrase “Taxi in position and hold.” Misunderstanding may cause additional transmissions and workload for ATC, as well as potential confusion in the cockpit.

**SUGGESTED ATPAC ACTION:** ATPAC requests the FAA take the following actions:

1. File a difference with ICAO, as the UK has done.
2. Through MAPCOG (Multi-Agency Procedures Coordination Group) address our concerns with ICAO.
3. Revise US policy to require use of “Line up” rather than “Taxi in position and hold.” ALPA continues to believe that continued US insistence upon using phraseology different from that of ICAO is unsafe. Standardized phraseology is a key component of safe operations and it is time for the US to join the rest of the world. If we do not, we should expect this type of problem to surface again.

**108**—AOC presented. Requested briefing from the international division at the October meeting.

**109**—There remains confusion when pilots of different countries go to other countries where different phraseology is used. Needs to be brought up with ICAO.

**110**—A letter is being written to ICAO suggesting that phraseology be changed to previous phraseology or adopt U.S. phraseology. A copy of the letter will be provided to the committee once completed.

**111**—Karen Pontius, ATP-120, briefed the committee. The FAA is not changing to the ICAO phraseology. ICAO is considering going back to the previous phraseology, but no definite plans at this time. Currently, a memo is in process that will address the issue.

**112**—Copy of briefing update provided to the committee. A letter was written to ICAO requesting that they change their phraseology for harmonization; however, phraseology will not be changed. Appears to be a “stand-off” between U.S. and Canada regarding who should change.

Prior to drafting a recommendation, committee members should review Jeppeson pages, FARs, and other manuals to see what guidance already exists.

**113**—The committee was briefed that another letter is “supposedly” coming from ICAO urging that we institute the phraseology. No further information available at this time.

**114**—Runway safety office is looking at a lot of the phraseology that is different. An effort is underway to harmonize phraseology. The FAA is looking at all differences that exist and where we can harmonize with ICAO. Safety office is looking at conducting human factors study to determine the impact of changing phraseology. This effort will begin sometime in 2004. The safety office will provide a further update in April. The April update should include the phraseology that the Safety Office is looking at.

**115**—Analysis still being done on TIPH. Some new things implemented ex. “Position and Hold.” ARI will do human factors study on “Position and Hold” vs. “Line Up and Wait,” which should be available by the next meeting.

**116**—The ATO-R representative was unable to attend the meeting. An update will be provided at the next meeting.

**117**—Briefing from LaGretta Bowser, ATO-R. Analysis will be done in FY05. This will include TIPH vs. Line up and wait. Currently, the continuing resolution is holding up the contracting. It was suggested that a study be done of who has filed differences with the phraseology.

**118**—The following was provided by LaGretta Bowser, ATO-S, for briefing to the committee:

The statement of work is being finalized and the project completion date is anticipated to be September 2005.

There was some discussion by the committee about seeing the statement of work. The committee requests an update at the next meeting in April.

**119**—The ATO-S representative was unable to attend the meeting, but provided the following information.

A meeting with the Professor who will lead the Phraseology review will be held on April 28<sup>th</sup>. The Statement of Work (SOW) will be completed after that.

**120**—LaGretta Bowser (ATO-S) briefed the committee. Statement of Work (SOW) is completed. A linguist has been hired to do the study on “line up and wait” vs. “position and hold.” This will be completed by December. ICAO is also concerned about this issue. On July 11<sup>th</sup> they changed back to “taxi to holding point.” Some foreign controllers are using “position and wait” for US airlines. NTSB also has some concerns about this issue, especially harmonization.

**121**— LaGretta Bowser (ATO-S) briefed the committee. Information currently being gathered on “taxi to” versus “line up and wait.” The linguist hired to do the study had a personal issue, which delayed the start of the work.

**122**— Kim Cardosi (ATO-S) briefed the committee. There were problems with the original plan to have a linguist. VOLPE and there linguist are now working the issue. They looked at runway incursions and ASRS reports taking a linguistic/acoustic approach. “position and hold” is much more likely to be confused than “line up and wait.” Conclusion is endorsement for “line up and wait.” There is talk that Safety may make a recommendation to ATO-T. This has not happened yet. Transition to anything new will have issues. ATO-T will need feedback from external sources to work the final draft.

**RECOMMENDATION #1: That FAA adopt “line up and wait” based on the NTSB recommendations and the draft FAA study.**

**123** – The FAA has adopted “line up and wait.” Safety risk mitigation (SRMP) is required and will be done later in the year.

**124** – SRMP scheduling is in progress per phone call to LaGretta Bowser, ATO-S.

**125** – LaGretta Bowser briefed that the SRMD for this item may begin in April, 2007 and she solicited input from the membership. Dave Madison advised that this item is currently in I & I with NATCA and in AOV for review.

**126** – Ms. Bowser will be asked to update the committee at 127.

**127** - Ms. Bowser briefed that Line up and Wait may be considered by year’s end.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1: That FAA adopts “line up and wait” based on the NTSB recommendations and the draft FAA study.**

**IOU: LaGretta Bowser will be asked, if applicable, to brief the committee at meeting 128.**

## ATPAC UPDATE

### AREA OF CONCERN 112-1

7/28/03

SAFETY: No

#### **SUBJECT: Clarification of “Direct” Clearance**

#### **DISCUSSION:**

It has been pointed out that a clearance to fly “direct” to a city, for example, ELP, where the airport and the VOR share the same spoken name, yet are not co-located, leads to confusion as to whether or not the clearance was to the airport or to the VOR. The AIM and the 7110.65 do not specifically identify which location is intended. In light of the implementation and expansion of RNAV procedures nationwide, it might be time to specifically identify the desired destinations in both of these documents. When queried about this potential disparity many controllers presented opposite answers while pilots also responded on both sides of the issue. The pilots who believe they’ve been cleared to the airport are inserting runway extensions (to the runway of choice) into FMC databases and allowing LNAV/GPS to fly them to that point. The controllers are relying on the approach controller to redirect the a/c onto the arrival as needed for spacing. With the intent of RNAV/LNAV of reducing communication transmissions and consistency of track it is time to clarify this issue.

**SUGGESTED ATPAC ACTION:** That ATPAC discuss this issue and add a note and/or an example in both the 7110.65 and the AIM indicating that the controller will specify when the clearance limit is not to the airport of intended landing.

7110.65 Para. 4-2-5a1

AIM Para. 4-4-4 (new “d”???)

Note: In cases where the airport and VOR share the same name, it is intended that the airport is the clearance limit unless otherwise stated.

**112**—Committee advised to await FAA’s response prior to drafting a recommendation.

**113**—Discussion was held about different handbook changes that could be made concerning this issue. One member brought up that NAVAID names not on the airport should be changed to distinguish from the airport identifier. Changes to VORs would be easy with a maximum of 1033 needing to be changed.

ATP will find out if ATA-100 is currently working on this issue.

**RECOMMENDATION #1: The FAA change the names of NAVAIDS, which are the same as the name of the airport, and not located on airport property.**

**114**—Anything in the future will have different names and anything that is in existence has been grandfathered in. ATP has requested that ATA-100 look at section 3 of 7400.2E. An update is expected in April. The group would also like to see a copy of the memo from ATP to ATA.

**115**—ATA is just beginning work on the issue. No update available at this meeting.

**116**—ATA is working the issue and will provide a briefing to the committee at the October meeting.

**117**—Update provided by ATO-R representative. List of airports was produced and memo sent to field. Issues will be dealt with on a case by case basis.

Data provided to committee. A data rerun of 0-5 miles was done and showed over 1000 airports. Are we fixing the problem by changing the names? Is there another way?

Research needs to be done on the pilot/procedural side and the manuals before it can be decided if this is a big issue.

**118**—Searches indicate that there are hundreds of airport/NAVAID names that are the same. Discussion about whether this is a problem. At a long distance it may not, but closer in it may be a problem. It was noted that if pilots are not sure they have been cleared to the airport or the NAVAID, then they should ask the controller.

Question asked: what is the actual breakdown based on distances? FAA provided the following:

Total	~1400
Less than 1 mile	972
1-2 miles	72
2-3 miles	51
3-4 miles	77
4-5 miles	72
Greater than 5 miles	155

**119**—Based on information from meeting 118 should this issue be continued? Several members said yes. After discussion it was decided that the committee would amend Recommendation #1 as follows:



**RECOMMENDATION #2: The FAA change the names of NAVAIDS, which are the same as the name of the airport, and are greater than 2 NM from the airport reference point.**

120—ATO-R is working the issue. No update is available at this meeting.

121—Analysis shows approximately 350 NAVAIDS with the recommended requirement. Several are part of airways, etc., which leads to rulemaking and has to be done by service areas. This could be a burden. Also, local authorities are likely to raise issues.

122—ATO-R sent a memo to service areas asking for a list of non-located NAVAIDS and airports with the same name. No response has been received. This process will be time consuming to the service areas. Can we track what gets changed in the process of other charting work? Needs discussion to see who initiates the process and how it is done. Should we start with further out first, within 5 nm, etc?

**RECOMMENDATION #2 (Modified): The FAA change the names of NAVAIDS non co-located NAVAIDS with the same name and greater than 5NM from the airport, prioritizing by distance and tied to review cycles.**

123 – There has not been a lot of response from the service areas on the memo noted at meeting 122. ATO-R will be putting together a strategy to get more response. Some of the changes will require rulemaking. ASRS has been getting reports of confusion in this area. There may be some handbook changes (AIM, 7110.65) that will clarify the situation in the interim prior to name changes. ATO-R will look into this.

124 – ATO-R will re-visit with Service Areas. No input has been received to-date. Dick Powell is developing a process to solicit prompt action from the service areas.

125 – Nancy Kalinowski briefed that communications with the Service Areas has not been completed and that the initial queries were not conclusive. She advised her office will continue efforts to resolve this AOC.

126 – Steve Alogna will obtain the status of this AOC and report at 127.

127 – John Timmerman reported that Dick Powell has been directed to address this issue with the respective Service Areas with the goal being to definitively resolve these issues. Steve Alogna will track progress and report at 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #2 (Modified): The FAA change the names of NAVAIDS non co-located NAVAIDS with the same name and greater than 5NM from the airport, prioritizing by distance and tied to review cycles.**

**IOU: ATO-R**

## ATPAC UPDATE

### AREA OF CONCERN 114-2

1/27/04

SAFETY: No

**SUBJECT: Pilot/Controller Glossary Addition: COMPLY WITH PUBLISHED RESTRICTIONS**

**DISCUSSION:** FAAO 7110.65 paragraph 5-6-2f currently contains the term “**COMPLY WITH RESTRICTIONS**”. This phrase may be issued by controllers in lieu of reissuing individual altitude restrictions published on a SID/DP/STAR, when the controller is vectoring an aircraft back onto one of these procedures. While the term appears to be self explanatory, it is no more so than many of the other terms defined in the Glossary. Further, during the course of implementing RNAV arrivals and departures at Las Vegas, this phrase has been used and misunderstood by some pilots executing the procedures to the extent pilot deviations occurred.

**SUGGESTED ATPAC ACTION:** That ATPAC review this item and recommend the Pilot/Controller Glossary be amended to include the following definition of “**COMPLY WITH RESTRICTIONS**”

*COMPLY WITH RESTRICTIONS – An ATC instruction is issued by a controller that requires an aircraft being vectored back onto an approach or departure procedure to comply with all of the altitude and crossing restrictions depicted on the procedure. Controllers may use this term in lieu of repeating each remaining restriction that appear on the procedure when issuing a clearance to climb via/descent via, or resume the procedure.*

114- Update will be provided before the April meeting. The group discussed changing the phraseology to “comply with published restrictions”, but could not reach consensus. FAA will take to phraseology work group that meets next week.

**RECOMMENDATION #1: Pilot/Controller Glossary is amended to include the following definition of “COMPLY WITH RESTRICTIONS” and cross reference it in the altitude section of the 7110.69. COMPLY WITH RESTRICTIONS – An ATC instruction is issued by a controller that requires an aircraft being vectored back onto an approach or departure procedure to comply with all of the altitude and crossing restrictions depicted on the procedure. Controllers may use this term in lieu of repeating each remaining restriction that appear on the procedure when issuing a clearance to climb via/descent via, or resume the procedure.**

115—PARC is working the recommendation. Update will be provided in July.

**116**—Update provided by the RNP office. The definition recommended by ATPAC refers to “climb via” phraseology and is dependent upon the proposed phraseology. The development of “climb via” phraseology continues to be addressed by PARC. A human factors test plan is under development in conjunction with the William J. Hughes Technical Center. A review of the test plan will be conducted by the working group members the week of July 26<sup>th</sup> in Atlantic City.

ATPAC upon advise by the RNP office alters the **Recommendation #1** definition to the following:

**“COMPLY WITH RESTRICTIONS – An ATC instruction is issued by a controller that requires an aircraft being vectored back onto an arrival or departure procedure to comply with all altitude and or speed restrictions depicted on the procedure. Controllers may use this term in lieu of repeating each remaining restriction that appears on the procedure when issuing a clearance to climb via/descend via, or resume the procedure.”**

**117**—Briefing from Bruce Tarbert, RNAV and Don Porter, CSSI. “Climb Via” is a new phraseology procedure being developed by the PCCP workgroup. Comply with Restrictions will be done away with when this is developed. Simulations will be done in the December/January timeframe. It was suggested that the workgroup bring in international to work on the issue together. This would decrease exceptions.

**118**—The following information was provided by the RNP Office:

**BACKGROUND:** As a result of ATPAC’s AOC 114-2, and the Committee’s recommendation, the RNP Program Office (ATO-R/RNP) tasked the Pilot/Controller Procedures and Phraseology (P/CP) working group to discuss this issue at its October meeting. The P/CP was established to address RNAV and RNP implementation issues. The P/CP is made up of air traffic, aviation, and union subject matter experts. The P/CP reviews, assesses and proposes changes to ATC procedures and phraseology and is tasked by the RNP Program Office with incorporating those changes into FAA Order 7110.65, the AIM and AIP.

**RECOMMENDATION:** ATO-R/RNP concurs with ATPAC’s recommendation to include the phrase Comply with Published Restrictions and its definition in the PCG. ATO-R/RNP also concurs with ATPAC’s proposed definition with a slight modification as follows: – *An ATC instruction that is issued by a controller that requires an aircraft being vectored back onto an approach, **arrival** or departure procedure to comply with all of the crossing restrictions depicted on the remainder of the procedure. Controllers may use this term in lieu of repeating each remaining restriction that appears on the procedure.*

After discussion, ATPAC agreed with the RNP Office recommendation. The DCP will be processed.

119—DCP for “Comply with Published Restrictions” is being processed.

120—DCP is in process.

121—DCP is in process.

122—DCP is in process.

123—DCP is in process.

124 – DCP in progress

125 – Discussion regarding the length of time this issue has been in DCP status.

126 – Publication of change is expected August 30 per David Young.

127 – David Young reported that final disposition of this issue is expected by August, 2007. The DCP is out and expecting to be returned for August action.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION: “COMPLY WITH RESTRICTIONS – An ATC instruction is issued by a controller that requires an aircraft being vectored back onto an arrival or departure procedure to comply with all altitude and or speed restrictions depicted on the procedure. Controllers may use this term in lieu of repeating each remaining restriction that appears on the procedure when issuing a clearance to climb via/descend via, or resume the procedure.”**

**IOU: ATO-E**

## ATPAC UPDATE

### AREA OF CONCERN 116-1

7/14/04

SAFETY: No

**SUBJECT:** Revision to FAAO 7110.65 and the AIM

#### **DISCUSSION:**

**REFERENCES:** FAAO 7110.65, paragraph 4-2-5b: NOTE; AIM, Sections 4-4-9g and 5-2-6-e-7.

The possibility of a misunderstanding between pilots and controllers during the issuance of an ATC clearance has been identified during discussions on the application of “Climb Via” in the RNP/RNAV Phraseology Work Group meetings and should be corrected.

Specifically, in accordance with the references stated above, the use of the term “maintain” when used in conjunction with the initial ATC clearance issued prior to departure *could* be understood to be an amended clearance and have the possible affect of canceling altitude restrictions contained on the DPs issued in the same initial clearance. In considering this issue it is important to remember the following:

- The definition of “maintain” as contained in the P/C Glossary has not changed.
- The application and sequence of the term “maintain,” and the omission of previously issued altitude restrictions (including those on published DPs) is the key to understanding the procedure.

Each of the above references refers to a “**restating**” of the previously issued altitude to “maintain,” and the omission of any restrictions contained in a DP that would have applied. When the term “maintain” is used in the initial ATC clearance, *it is not a restatement*, but instead is one of the items included in the basic departure clearance data as contained in FAAO 7110.65, paragraphs 4-3-2 and 4-3-3, and paragraph 4-4-3 of the AIM.

While ALPA believes the possibility of a misunderstanding of the currently accepted procedure is small, ALPA realizes the task of ATPAC is to eliminate any such possibility to the extent possible. Therefore, ALPA recommends the following changes to both the AIM and FAAO 7110.65:

#### **SUGGESTED ATPAC ACTION:**

1. Revise FAAO 7110.65, Paragraph 4-2-5-b: NOTE: to read as follows: (New material is in bold and italics.)

*The term “Maintain,” when used in issuing an altitude assignment as an item in the initial ATC clearance delivered to an aircraft prior to departure, does not constitute an amended clearance that cancels altitude restrictions issued by ATC or contained on any DP issued as an integral part of the same clearance. The depicted or assigned altitudes apply. However, in subsequent transmissions, restating a previously issued altitude to maintain is an amended clearance. If altitude to “maintain” is changed or restated, whether prior to departure or while airborne, and previously issued altitude restrictions are omitted, altitude restrictions are cancelled, including DP/FMSP/STAR altitude restrictions if any.*

2. Revise AIM Paragraph 4-4-9g to read as follows: (New material is in bold and italics.)

The guiding principle is that the last ATC clearance has precedence over the previous ATC clearance. When the route or altitude in a previously issued clearance is amended, the controller will restate applicable altitude restrictions. *The term “Maintain,” when used in issuing an altitude assignment as an item in the initial ATC clearance delivered to an aircraft prior to departure, does not constitute an amended clearance that cancels altitude restrictions issued by ATC or contained on any DP issued as an integral part of the same clearance. The depicted or assigned altitudes apply. However, in subsequent transmissions, restating a previously issued altitude to maintain is an amended clearance.* If an altitude to “maintain” is changed or restated, whether prior to departure or while airborne, and previously issued altitude restrictions are omitted, altitude restrictions are cancelled, including DP/FMSP/STAR altitude restrictions if any.

3. Revise AIM Paragraph 5-2-6-e-7 as follows: (New material is in bold and italics)

If, *after the initial ATC clearance has been delivered and acknowledged*, an altitude to “maintain” is restated, whether prior to departure or while airborne, previously issued altitude restrictions are cancelled, including any DP altitude restrictions that applied.”

Appropriate cross-references should be annotated for each of these changes.

**SUGGESTED ATPAC ACTION:** That ATPAC review this item and recommend changes to FAAO 7110.65 and the AIM.

**116**—Committee expressed differing views on how clearance should be issued. Question – Does maintain cancel restrictions? This may be systemic and more than just an AIM change.

Committee requested to get RNAV and international offices views on the subject. Discussion will be held at October meeting.

**117**—Briefing from Bruce Tarbert, RNAV and Don Porter, CSSI. “Climb Via” is a new phraseology procedure being developed by the PCCP workgroup. Comply with Restrictions will be done away with when this is developed. Simulations will be done in the December/January timeframe. It was suggested that the workgroup bring in international to work on the issue together. This would decrease exceptions.

**118**—The following information was provided by the RNP Office:

BACKGROUND: As a result of ATPAC’s AOC 116-1, and the Committee’s recommendation, the RNP Program Office (ATO-R/RNP) tasked the Pilot/Controller Procedures and Phraseology (P/CPP) working group to discuss this issue at its October meeting. The P/CPP was established to address RNAV and RNP implementation issues, and is made up of air traffic, aviation, and union subject matter experts. The P/CPP reviews, assesses and proposes changes to ATC procedures and phraseology and is tasked by the RNP Program Office with incorporating those changes into FAA Order 7110.65, the AIM and AIP.

DISCUSSION: After lengthy discussion the P/CPP came to the following conclusions: if used as prescribed, the phrase "maintain" is clear and unambiguous; that this is an ATC training issue; and to create another "situational" (on the ground vs. in the air) definition for the use of “maintain” would create further confusion.

RECOMMENDATION: ATO-R/RNP concurs with the P/CPP and makes the following recommendations:

1. In the near term, develop a Mandatory Briefing Item (MBI) for ATC facilities that discusses this issue and gives the necessary guidance to correct the problem.
2. Include this issue, complete with a description of the problem and the correct applications and uses for the maintain phraseology, in the next RNAV and RNP Computer Based Instruction (CBI) that is currently under development and due to be completed in March. Distribution to facilities is planned in the June/July timeframe.
3. Make any necessary changes to the appropriate sections of the FAAO 7110.65, the AIM and the AIP to add clarity and emphasis where needed.

Discussion by the committee brought out these points:

- Confusion is on the pilot’s part not the controller.
- TB would not address this issue.
- Need to go to the POI’s, training schools, etc. to help

Update requested in April to see the definitions.



**119**—Update provided by Bruce Tarbert and Don Porter of the RNP office.

Issue “Maintain” initial clearance. Because it has different meanings in different circumstances a training issue has arisen. An ATB article has been drafted and a CBI that addresses the issues is under review. Handbook changes will be look at if necessary.

In initial clearance it is not possible to clear above SID altitudes without canceling prior SID altitudes. Altitude is a legal part of the clearance and has to be included. System Operations is looking at this issue.

**120**—The RNAV office was unable to provide an update for the Anchorage meeting. Updated status will be provided in October.

**121**—Update provided by Don Porter of the RNAV Office. There are several issues with “maintain” in SIDs and STARs. It is a problem for both pilots and controllers. A better definition may need to be looked at by Don’s group. One solution is to insert waypoint to define altitude. (Ex. “Descend via Baxter1, after Laady maintain 080.”) Meaning should be the same in the air as on the ground. Training issues are forthcoming.

**122**—“Descend via” has been in the book for a year and not all know about it. Lots of ASRS reports on the confusion. “Maintain” also causing confusion, including while aircraft are descending. Issue – With a restriction on SIDs/STARs does “maintain” cancel restriction? Yes. The above issues need to be given to Don’s group. Training is a must. There needs to be a basis understanding. Also, suggest an ATB on phraseology. Issue of ICAO harmonization also needs to be addressed.

**123** – The RNAV office representative was unable to attend this meeting and will be invited to meeting 124.

**124** – Per Bruce Tarbert, RNAV/RNP Office, Don Porter is working on the draft DCP.

**125** – A DCP will be developed and put into process by Dave Madison, ATO-T, who will also coordinate with Flight Standards.

**126** – Dave Madison was unable to attend and report on this AOC.

**127** – The Glossary has been brought up to speed for additional meaning. Ben reported that the DCP is out for comment and now being worked by ATO-E

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION: In the near term, develop a Mandatory Briefing Item (MBI) for ATC facilities that discuss this issue and gives the necessary guidance to correct the problem.**

1. **Include this issue, complete with a description of the problem and the correct applications and uses for the maintain phraseology, in the next RNAV and RNP Computer Based Instruction (CBI) that is currently under development and due to be completed in March. Distribution to facilities is planned in the June/July timeframe.**
2. **Make any necessary changes to the appropriate sections of the FAAO 7110.65, the AIM and the AIP to add clarity and emphasis where needed.**

**RECOMMENDATION 2:** AOC 116-1 discussed in-depth the issues involving the application of the term “Maintain”. However, a review of the AOC revealed that an important additional item should be added to the suggested ATPAC action in that AOC. That is, the addition of a third application of the term “maintain” in the Pilot/Controller Glossary. This is necessary because the current definition does not address the issue of the term’s meaning when applied in amended clearances, and that is a source of the existing problem.

For reference: Maintain is currently defined in the Pilot/Controller Glossary as:

- a. *Concerning altitude /flight level, the term means to remain at the altitude/flight level specified. The phrase “climb and” or “descend and” normally precedes “maintain” and the altitude assignment; e.g., “descend and maintain 5,000.”*
- b. *Concerning other ATC instructions, the term is used in its literal sense; e.g., maintain VFR”*

The following is proposed as a revision to the above definition of “maintain” as it now exists. The new material is in italics:

- a. Concerning altitude /flight level, the term means to remain at the altitude/flight level specified. The phrase “climb and” or “descend and” normally precedes “maintain” and the altitude assignment; e.g., “descend and maintain 5,000.”
- b. *Concerning the use of the term in amended clearances prior to or after departure. If altitude to “maintain” is changed or restated in the amended clearance, and previously issued altitude restrictions are omitted, altitude restrictions are cancelled, including FMSP/STAR altitude restrictions if any.*
- c. Concerning other ATC instructions, the term is used in its literal sense; e.g., maintain VFR”

**IOU: Dave Madison, ATO-T**

## ATPAC UPDATE

### AREA OF CONCERN 116-3

7/14/04

SAFETY: No

**SUBJECT: ILS Glide Slope Critical Area Advisory (Define Autoland versus Coupled)**

**REFERENCE:** AIM 1-1-9k2(b)(2)

**DISCUSSION:** The above referenced paragraph in the AIM does not accurately reflect what terminology pilots should use when advising ATC they will conduct a coupled/autoland approach when the weather is above 800-2. The example used in the paragraph “*Glide slope signal not protected*” is an advisory that would be issued by the control tower in response to pilot notification of a coupled approach.

Another issue contained in this paragraph that ATPAC needs to discuss is that the ILS critical areas are only protected when the aircraft is inside the middle marker (MM). Considering the fact that MM's are located approximately 3500ft from the runway threshold, which is entirely too short a distance to be useful for such approaches, and they are being removed at the majority of locations, it appears necessary to replace the term MM in this paragraph with “Final Approach Fix (FAF).” This would be in line with the Glide Slope Critical Area comments contained in AIM paragraph 1-1-9k(2).

The use of coupled/autoland approaches has become more common with the fleet of highly automated aircraft operating in the inventory, and the ILS critical area requirements need to be updated to reflect this fact.

**SUGGESTED ATPAC ACTION:** That ATPAC discuss this issue and recommend the following:

1. That the pilot advisory example contained in the above referenced AIM paragraph be replaced with the following sample advisory: “*(Name of tower)(Callsign) coupled/autoland approach.*”
2. That the term MM contained in the above referenced AIM paragraph be replaced with the term **FAF** or **OM**, whichever is the most appropriate.

**116**—MSP has a glideslope critical area issue with a certain taxiway. Many aircraft use the coupled approach most of the time. Comment that when issuing ILS procedures it should be known that the aircraft is coupled without having to broadcast it on the frequency. This will be a capacity issue because aircraft must be certified to “autoland.” If not certified, they can't fly CATIII. AFS needs to be involved in this issue.

**RECOMMENDATION #1:**

1. That the pilot advisory example contained in the above referenced AIM paragraph be replaced with the following sample advisory: “(Name of tower)(Callsign) coupled/autoland approach.”

2. That the term MM contained in the above referenced AIM paragraph be replaced with the term FAF or OM, whichever is the most appropriate.

117—Office of Primary Interest (OPI) has been contacted. Committee will be provided status when available.

118—There was concern that the OPI would understand the issues being addressed and would make the proper handbook changes. The OPI will be contacted and a discussion will be held at the next meeting.

119—800&2 and below is protected, not above. If there is no compelling evidence then policy should not be changed. Possibly change 7210.3 to designate a runway for autoland approaches to CAT II/III runways. Alternate is maintenance recertification.

**RECOMMENDATION #2:**

**That the FAA ATO develop guidance to achieve the following:**

**FAA Order 7210.3, Facility Operation and Administration, should be changed to have terminal facilities with CAT II or CAT III approaches include procedures to accommodate “coupled” or “autoland” operations per FAA Order 7110.65, 3-7-5b to include protecting the critical area. This should include controller awareness of the need to accommodate these operators and may include designating a preferred runway and arrival procedures for these operations.**

120—Several ideas were provided on this AOC:

- Consider designating autoland/coupled approach runways as per Recommendation #2.
- Provide more education to controllers.
- Obtain development help from Anchorage office (Mozko).
- Certification could relax the 90 day requirement for autoland/coupled approaches.
- Determine which airports could dedicate a runway for these approaches.

AT and AF will work on the dedicated runway issue.

**RECOMMENDATION #3: Synchronize the AIM to the 7110.65/PCG definition of ILS Critical Area.**

**121**—Instruction issued to controllers to issue and protect the approaches when able. ATO-T said there is no need for having airports dedicate runways for this purpose. Airports need to be aware of the need and accommodate as much as possible.

**122**—Article in ATB regarding facility's handling coupled/autoland approaches. There are 2 issues. Autopilot cert. issues and flying coupled because ops. specs./company require it. If the critical area is unprotected the pilot is out on a limb. There is a disconnect between certification, AFS, AT, and the POIs.

**RECOMMENDATION #1 (Revised Part 1):**

**That the pilot advisory example contained in the above referenced AIM paragraph be replaced with the following sample advisory: *(Call sign) AUTOLAND or COUPLED APPROACH.***

**Add: The tower will advise if the ILS critical areas are not protected with the following sample advisory: *ILS critical areas not protected.***

**123** – Comment that ATC is not aware of the requirements for autoland/coupled approaches. Would an ATB article help address this issue? AFS could look at the requirements because they are the ones that impose them.

ATO-T will work Recommendation #1 and the chair will provide draft language for Recommendation #3. As previously reported, Recommendation #2 will not be implemented.

**124** – Common language was defined by the group and will be submitted. Mark Cato will write an article for pilots and Flight Standards highlighting the committee's new thinking on the coupled/autoland issue and Harry will consider that as a starting point for coordination for an HBAT item. Also, Dave and John will develop a DCP to reflect the following ATPAC recommendations:

**Recommended changes included deleting references to Autoland in Coupled Definition and Coupled in Autoland Definition.**

AUTOLAND APPROACH- An autoland approach is a precision instrument approach to touchdown and, in some cases, through the landing rollout. An autoland approach is performed by the aircraft autopilot which is receiving position information and/or steering commands from onboard navigation equipment.

1. Note: Autoland approaches are flown in VFR and IFR. It is common for carriers to require their crews to fly autoland approaches (if certified) when the weather conditions are less than approximately 4,000 RVR.

COUPLED APPROACH- A coupled approach is an instrument approach performed by the aircraft autopilot which is receiving position information and/or steering commands

from onboard navigation equipment. In general, coupled nonprecision approaches must be discontinued and flown manually at altitudes lower than 50 feet below the minimum descent altitude, and coupled precision approaches must be flown manually below 50 feet AGL.

1. Note: Coupled approaches are flown in VFR and IFR. It is common for carriers to require their crews to fly coupled approaches (if certified) when the weather conditions are less than approximately 4,000 RVR.

### **7110.65 Recommended change**

#### 3-7-5. PRECISION APPROACH CRITICAL AREA

1b. Air carriers commonly conduct "autoland" operations to satisfy maintenance, training, or reliability program requirements. Promptly issue an advisory if the critical area will not be protected when an arriving aircraft advises that an "autoland" approach will be conducted and the weather is reported ceiling of 800 feet or more, and the visibility is 2 miles or more.

### **Recommended change includes flight crew notification to Approach Control**

#### **AIM 1-1-9k2**

##### k. ILS Course Distortion

1. All pilots should be aware that disturbances to ILS localizer and glide slope courses may occur when surface vehicles or aircraft are operated near the localizer or glide slope antennas. Most ILS installations are subject to signal interference by surface vehicles, aircraft or both. ILS CRITICAL AREAS are established near each localizer and glide slope antenna.

2. ATC issues control instructions to avoid interfering operations within ILS critical areas at controlled airports during the hours the Airport Traffic Control Tower (ATCT) is in operation as follows:

(a) Weather Conditions. Less than ceiling 800 feet and/or visibility 2 miles.

(1) Localizer Critical Area. Except for aircraft that land, exit a runway, depart or miss approach, vehicles and aircraft are not authorized in or over the critical area when an arriving aircraft is between the ILS final approach fix and the airport. Additionally, when the ceiling is less than 200 feet and/or the visibility is RVR 2,000 or less, vehicle and aircraft operations in or over the area are not authorized when an arriving aircraft is inside the ILS MM.

(2) Glide Slope Critical Area. Vehicles and aircraft are not authorized in the area when an arriving aircraft is between the ILS final approach fix and the airport unless the aircraft has reported the airport in sight and is circling or side stepping to land on a runway other than the ILS runway.

(b) Weather Conditions. At or above ceiling 800 feet and/or visibility 2 miles.

(1) No critical area protective action is provided under these conditions.

(2) A flight crew, under these conditions, should advise the approach control, “(Call sign), autoland approach.” to request that the ILS critical areas are protected.

EXAMPLE-

Glide slope signal not protected.

**(Note added)**

Note: Aircrews navigating a precision or non-precision approach other than autoland by engaging the autopilot should not expect critical area protection if the weather is at or above ceiling 800 feet and/or visibility 2 miles.

3. Aircraft holding below 5,000 feet between the outer marker and the airport may cause localizer signal variations for aircraft conducting the ILS approach. Accordingly, such holding is not authorized when weather or visibility conditions are less than ceiling 800 feet and/or visibility 2 miles.

4. Pilots are cautioned that vehicular traffic not subject to ATC may cause momentary deviation to ILS course or glide slope signals. Also, critical areas are not protected at uncontrolled airports or at airports with an operating control tower when weather or visibility conditions are above those requiring protective measures. Aircraft conducting coupled or autoland operations should be especially alert in monitoring automatic flight control systems.

(See FIG 1-1-7.)

NOTE-

Unless otherwise coordinated through Flight Standards, ILS signals to Category I runways are not flight inspected below 100 feet AGL. Guidance signal anomalies may be encountered below this altitude.

**125** – The ATPAC recommendation was validated and will be forwarded for action by ATO-R.

**126** – Dave Madison was unable to attend this meeting for ATO-T.

**127** – Dave Madison was unable to attend this meeting and his specialist, Ben Grimes, did not have information regarding this issue.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1 (Revised Part 1):**

**That the pilot advisory example contained in the above referenced AIM paragraph be replaced with the following sample advisory: *(Call sign) AUTOLAND or COUPLED APPROACH.***

**Add: The tower will advise if the ILS critical areas are not protected with the following sample advisory: *ILS critical areas not protected.***

recommended changes included deleting references to Autoland in Coupled Definition and Coupled in Autoland Definition.

**AUTOLAND APPROACH-** An autoland approach is a precision instrument approach to touchdown and, in some cases, through the landing rollout. An autoland approach is performed by the aircraft autopilot which is receiving position information and/or steering commands from onboard navigation equipment.

**1. Note:** Autoland approaches are flown in VFR and IFR. It is common for carriers to require their crews to fly autoland approaches (if certified) when the weather conditions are less than approximately 4,000 RVR.

**COUPLED APPROACH-** A coupled approach is an instrument approach performed by the aircraft autopilot which is receiving position information and/or steering commands from onboard navigation equipment. In general, coupled nonprecision approaches must be discontinued and flown manually at altitudes lower than 50 feet below the minimum descent altitude, and coupled precision approaches must be flown manually below 50 feet AGL.

**1. Note:** Coupled approaches are flown in VFR and IFR. It is common for carriers to require their crews to fly coupled approaches (if certified) when the weather conditions are less than approximately 4,000 RVR.

#### 7110.65 Recommended change

#### **3-7-5. PRECISION APPROACH CRITICAL AREA**

**1b.** Air carriers commonly conduct "autoland" operations to satisfy maintenance, training, or reliability program requirements. Promptly issue an advisory if the critical area will not be protected when an arriving aircraft advises that an "autoland" approach will be conducted and the weather is reported ceiling of 800 feet or more, and the visibility is 2 miles or more.

#### Recommended change includes flight crew notification to Approach Control

#### AIM 1-1-9k2

#### **k. ILS Course Distortion**

**1.** All pilots should be aware that disturbances to ILS localizer and glide slope courses may occur when surface vehicles or aircraft are operated near the localizer or glide slope antennas. Most ILS installations are subject to signal interference by surface vehicles, aircraft or both. ILS CRITICAL AREAS are established near each localizer and glide slope antenna.

**2.** ATC issues control instructions to avoid interfering operations within ILS critical areas at controlled airports during the hours the Airport Traffic Control Tower (ATCT) is in operation as follows:

**(a) Weather Conditions.** Less than ceiling 800 feet and/or visibility 2 miles.



**(1) Localizer Critical Area.** Except for aircraft that land, exit a runway, depart or miss approach, vehicles and aircraft are not authorized in or over the critical area when an arriving aircraft is between the ILS final approach fix and the airport. Additionally, when the ceiling is less than 200 feet and/or the visibility is RVR 2,000 or less, vehicle and aircraft operations in or over the area are not authorized when an arriving aircraft is inside the ILS MM.

**(2) Glide Slope Critical Area.** Vehicles and aircraft are not authorized in the area when an arriving aircraft is between the ILS final approach fix and the airport unless the aircraft has reported the airport in sight and is circling or side stepping to land on a runway other than the ILS runway.

**(b) Weather Conditions.** At or above ceiling 800 feet and/or visibility 2 miles.

**(1) No critical area protective action is provided under these conditions.**

**(2) A flight crew, under these conditions, should advise the approach control, “(Call sign), autoland approach.” to request that the ILS critical areas are protected.**

**EXAMPLE-**

**Glide slope signal not protected.**

**(Note added)**

**Note:** Aircrews navigating a precision or non-precision approach other than autoland by engaging the autopilot should not expect critical area protection if the weather is at or above ceiling 800 feet and/or visibility 2 miles.

**3. Aircraft holding below 5,000 feet between the outer marker and the airport may cause localizer signal variations for aircraft conducting the ILS approach. Accordingly, such holding is not authorized when weather or visibility conditions are less than ceiling 800 feet and/or visibility 2 miles.**

**4. Pilots are cautioned that vehicular traffic not subject to ATC may cause momentary deviation to ILS course or glide slope signals. Also, critical areas are not protected at uncontrolled airports or at airports with an operating control tower when weather or visibility conditions are above those requiring protective measures. Aircraft conducting coupled or autoland operations should be especially alert in monitoring automatic flight control systems.**

**(See FIG 1-1-7.)**

**NOTE-**

**Unless otherwise coordinated through Flight Standards, ILS signals to Category I runways are not flight inspected below 100 feet AGL. Guidance signal anomalies may be encountered below this altitude.**

**IOU: ATO-T**

## ATPAC UPDATE

### AREA OF CONCERN 116-5

7/14/04

SAFETY: No

#### **SUBJECT: Revision to STAR Order 7100.9D**

**DISCUSSION:** STAR Order 7100.9D states; “*STARS Shall: Terminate at an initial approach fix for a standard instrument approach procedure or at a point in space defined by a fix or waypoint. An RNAV STAR shall terminate at a point from which radar vectors may be initiated.*” Also: “*For RNAV STARS that terminate at a point in space, annotate on the chart that radar vectors will be provided; e.g. expect radar vectors to final, and annotate the chart with the lost communication procedure if lost communications procedures differ from 14 CFR 91.185.*”

A review of any number of STARS reveals two common themes regarding the terminating fix. The procedure either ends at the terminus fix or ends at the terminus fix followed by a specified heading.

In the first example, it may be somewhat confusing as to what heading should be flown in the event ATC does not issue a heading upon crossing the terminus fix or if the aircraft has lost communications with ATC. Ask any number of pilots and you will get multiple interpretations. Anything from fly the inbound radial, enter the gold if depicted, or fly the default heading after crossing the fix.

The latter procedure is probably the most common and probably what ATC desires. However, would that be the case if the airplane had been vectored off the procedure and crossed the terminus fix from an angle that varied from the published lateral track? In this scenario it could be quite possible the default heading would direct the aircraft towards other arriving or departing aircraft.

Procedures that end with a specified heading prevent unpredictable flight tracks in the event of lost comm., blocked frequencies, and busy controllers. At a minimum, ALPA believes STARS should end with a specific heading.

Another point of contention is the lack of guidance in the event of lost communications. Most STARS are consistent with their verbiage – “*Expect vectors to final approach course.*” Again, it is somewhat open to interpretation as to how the pilot chooses to proceed to the final approach course and at what point or time the pilot should commence this.

Statistically, lost comm. could be considered a rare occurrence with today’s equipment. This is all the more reason for simplifying procedures for flight crews.

SEA has done an excellent job of terminating their conventional STARs with specific headings **and** depicting Lost Comm procedure information boxes on the chart. There is no question as to the steps the pilot should follow. The terrain at SEA probably dictated the need for specific headings and instructions. Wouldn't it be practical for this to be the standard for the STAR order?

Ideally, LAS has developed "automatic" lost comm. procedures on their RNAV STARs that terminate at an IAF. Three out of four arrivals actually **clear** the lost comm aircraft for the ILS. The pilot does not have to consider ETA or holding instructions. Simply fly the arrival, execute the approach, and land.

The fourth arrival does not terminate at an IAF, but it guides the airplane to within five miles of the airport on a base leg, giving the pilot two options – maintain VFR and land (since the airport will probably be in sight), or follow the lost comm. procedure if IMC.

As more and more RNAV STARs are designed and implemented, ALPA believes there will be a need for procedures to terminate at an IAF. Since this is not the case for most existing procedures, ALPA believes ATPAC should concentrate on addressing a simple approach to fixing the current problem with STAR terminus.

**SUGGESTED ATPAC ACTION:** That ATPAC review this issue and recommend the FAA revise the STAR Order to reflect more precise guidance regarding the terminus fix and lost communications. In doing this, the following safety benefits should be considered:

- Consistent charting
- Clear and consistent guidance to pilots at the terminus fix of the procedures
- Unambiguous lost communication direction
- Enhanced predictability for ATC in the event of blocked or lost communication after the terminus fix.

Specific recommendations are:

- Published headings should follow the terminus fix.
- Each facility should consider the most efficient heading to use at the terminus, based on traffic flow and runway usage.
- All STARs should contain standard formatted Lost Communication Procedure information boxes.

**116**—The ATO-R, RNP Program Office had the following comments on the committee's suggestions:

Published headings should follow the terminus fix.

Design guidance provided to procedure specialist incorporates the use of a heading following the terminus fix. Consideration will be given in future revisions FAAO 7100.9D, Appendix 2-b-3 to require the use of a VM path terminator after the last waypoint for those procedures terminating at a point in space. The use of a VM path terminator would provide heading guidance from the coded database. Charting conventions currently support the depiction of the heading for VM legs.

Each facility should consider the most efficient heading to use at the terminus, based on traffic flow and runway usage.

This guidance is included in FAAO 7100.9D, Appendix 5, as part of the design process. The inclusion the Lead Operator as part of the RNAV Implementation Working Group provides feedback on the procedure design and route flyability.

All STARs should contain standard formatted Lost Communication Procedure information boxes.

This recommendation if adopted, should be referred to the Aeronautical Charting Forum (ACF). As a collaborative working group including both FAA and industry experts, the ACF can make recommendations to charting specifications to ensure uniformity.

After discussing the AOC and considering the comments by the RNP Program Office, the committee made the following recommendation:

**RECOMMENDATION #1:**

**Published headings should follow the terminus fix → The FAA draft a DCP for this part of the recommendation.**

**Each facility should consider the most efficient heading to use at the terminus, based on traffic flow and runway usage → The FAA review this part of the recommendation and take appropriate action.**

**All STARs should contain standard formatted Lost Communication Procedure information boxes → The FAA draft a DCP for this part of the recommendation and also advise the Aeronautical Charting Forum (ACF) of the committee's actions.**

**117**—After discussion it was decided that this issue would be better addressed by the ACF. Chairman will write a letter to that effect. The ATPAC member on the ACF will provide a briefing at the next meeting.

**118**—Letter to ACF is being drafted. Update will be provided in April.

**119**—Letter written from Chairman to the Aviation Charting Forum. No reply was received. Expect update in Anchorage. Next ACF meeting is May 11-12, 2005.

**120**—No response received from ACF. Committee member also on ACF does not recall this issue being discussed at their May meeting. Update will be provided in October.

**121**—Update provided to group by Bill Hammett, AFS-420. He indicated that this action was not brought before the ACF.

Discussion by the group led to the conclusion that the action that ATPAC wanted was misunderstood. ACF should address the issue and that some ATPAC members would like to attend the meeting to discuss the issues. The request will be retransmitted to the ACF.

**122**—Due to time constraints this AOC was not covered at this meeting.

**123** – Representative from AOPA will attend the Aviation Charting Forum (ACF) meeting being held this will and report on ATPAC’s concern.

**124** – Heidi Williams, AOPA, reported on progress from a summary of the ACF wherein John Moore, NACG, will submit a formal response to ATPAC.

**125** – ATO-R will check with NACG for their formal response and report at 126.

**126** – This item was not reviewed and will be deferred for a report at 127.

**127** – It was discussed during the meeting that Steve Alogna had received a letter from John Moore, Co-Chair, Aeronautical Charting Forum, NACG regarding this issue. The letter’s content will be discussed at 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1: Published headings should follow the terminus fix.**

**The FAA draft a DCP for this part of the recommendation.**

**Each facility should consider the most efficient heading to use at the terminus, based on traffic flow and runway usage. The FAA review this part of the recommendation and take appropriate action.**

**All STARs should contain standard formatted Lost Communication Procedure information boxes. The FAA draft a DCP for this part of the recommendation and also advise the Aeronautical Charting Forum (ACF) of the committee’s actions.**

**IOU : ATPAC will review NACG Letter at 128.**

## ATPAC UPDATE

### AREA OF CONCERN 117-1

10/5/04

SAFETY: No

**SUBJECT: Definition of the term “Airborne”**

**DISCUSSION:** Pilot reports to ALPA have made us aware that some ATC Towers are applying an unusual definition of “airborne.” The definition being used is that an aircraft is “airborne” when the aircraft rotates and the nose wheel comes off the ground. The significance of the definition relates to an aircraft landing or departing behind another aircraft that is departing from the same runway. FAA Order 7110.65, paragraphs 3-9-6 and 3-10-3, Same Runway Separation, permit controllers to apply minimum distances between succeeding arriving or departing aircraft if the controller can determine distances by reference to suitable landmarks and the other aircraft is airborne.

The “rotation” concept is used to enhance capacity, according to one tower support specialist. This is based on the idea that, at least in the case of Category III aircraft, the aircraft is beyond the maximum abort speed and the takeoff will occur. Another stated reason was that an arrival aircraft will not touch down immediately after crossing the landing threshold and the other aircraft will be “in the air,” i.e., all parts of the aircraft separated from terra firma, before the arrival touches down.

**SUGGESTED ATPAC ACTION:** Discuss the need for including a definition of airborne in the Pilot/Controller Glossary and make an appropriate recommendation.

**117**—Pilot feel they are being pushed too much and it is a safety issue. Comment made that pilot learn they can’t cross the threshold with another aircraft on the runway. Suggested possible solutions were MBI, procedures telcon for discussion. Update will be provided when available.

**118**—What exactly defines airborne? Nose wheel off, all wheels off? Should this be standardized and publicized? One member indicated that a number of court cases said it should be “all wheel off.” It was noted that if it is “all wheels,” then capacity would be affected. Noted that pilots would be concerned with the legality of “should they have made the landing.”

Discussion posed solution of an ATB, a PCG changes, etc.

**Recommendation #1: A definition of “Airborne” should be put in the Pilot Controller Glossary.**

**119**—AFS has not finalized the definition. Draft DCP will be provided when available.

**120**—ATO-T’s consensus is that the definition should be when “all wheels are off the ground.” Memo sent to AFS-200 on whether they agree with ATO-T.

**121**—ATO-T feels that all wheels off the ground is airborne. An MBI is under draft.

Should we be validating this first? How does AFS define airborne? Can we assume that current practices have acceptable risk? Recommendation that this issue be tabled until an SMS analysis and evaluation/study can be accomplished.

**122**—ATO-T says the definition is wheels off the ground. Recommendation #1 will be implemented.

**123** – ATO-T provided language for the new definition, which will go out for comment. Question was raised about looking into the possibility of changing the language to be “nose wheel off.” Perhaps a safety study/risk assessment can be done that will allow some form (e.g. category of aircraft) of this application. ATO-T will research this question through AFS.

**124** – This recommendation in SRM process now with AOV per Dave Madison.

**125** – AOV is still in the process of determining if the raising of the nose wheel alone meets safety requirements.

**126** – This item was not discussed at this meeting. Steve Alogna will check into status and report at 127.

**127** – Ben Grimes did not have sufficient data to discuss so he will discuss with David Madison and report at 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1: A definition of “Airborne” should be put in the Pilot Controller Glossary.**

**IOU: ATO-T**

## ATPAC UPDATE

### AREA OF CONCERN 118-2

1/12/05

SAFETY: No

#### **SUBJECT: AIM Chapter 7, Section 3, Wake Turbulence**

**DISCUSSION:** AIM guidance has not been updated relative to Wake Avoidance Procedures (Paragraph 7-3-6) for many years, even though much study has been done on the subject. Of particular interest to pilots are the wake behavior and mitigation strategies when pilots are conducting parallel visual and Simultaneous Offset Instrument Approaches (SOIA) to closely spaced runways.

The AIM tells pilots that wake turbulence, when landing behind another aircraft on the same runway, or closely spaced parallel runway, is best accomplished by flying above the glide path of the leading aircraft, picking an aiming point for touchdown beyond where the leading aircraft is anticipated to land (updated by the actual landing point) and landing “long,” beyond that touchdown point. There is also a requirement for air carrier pilots to land in the touchdown zone (first 3,000 feet of the runway beginning at the threshold) after flying above the leading aircraft’s flight path and landing long. Air carrier pilots are also required to adhere to stabilized approach criteria.

ATC IFR separation for wake turbulence relies on minimum in trail distances. For example: Four miles behind heavy, six miles small behind heavy. Pilots believe that wake protection is achieved by being further behind and above the leading wake generator.

However, when conducting visual approaches to closely spaced parallel runways, pilots are typically expected to fly behind a wake generator at distances that are much less than the minimum IFR ATC distances so as to accomplish visual acquisition, maintain visual separation behind the leading aircraft and close on the lead aircraft, so both aircraft in the pair land at the same time. Pilots are not offered AIM guidance in this situation as to the best mitigation strategy if they cannot stay high and land long for operational issues.

The AIM explanation of the effect of wind transport needs to be expanded. Using reported surface winds and INS winds aloft, pilots could determine if the wake generated by an aircraft landing on a closely spaced runway is being transported toward or away from their intended flight path. The effect of the wind on the wake transport is critical information for pilots.

**SUGGESTED ATPAC ACTION:** Discuss the AOC and make an appropriate recommendation(s).



**118**—AIM information on wake turbulence avoidance is outdated and needs to be updated. After 13 years of study, no procedural changes have been made. There has been a reduction in funding for studying wake turbulence.

Pilots have been told different ways to fly (ex. fly stabilized, fly high, etc.). It is not synchronized. AFS will have to determine the requirements.

**119**—Mike Webb, AFS provided some information on the subject. AFS will try to get answers to questions and present further information at the next meeting.

**120**—AFS is looking at wake turbulence where aircraft can fly in certain proximity to each other and where wake turbulence does not affect the non-generator. Always has been “high and long.” Nothing has changed to date. Will separation be changed? This has not been determined. Look at having Dave Lankford (AFS) provide information on the research that has been done.

**121**—Steve Lang, ATO-R provided a briefing.

Discussed what FAA is doing now including looking at the 2500’ rule, leveraging from NASA work, A380 standards. Work with LIDAR (laser that measures wake turbulence off the wing). Also, looking at active sensors and indicators.

Comment made that there is nothing out there now that would change the high/long that is currently used.

Request for further information on any plans, simulation testing, etc. concerning wake turbulence.

**122**—There are numerous issues being looked at with wake turbulence. ATPAC needs to be updated on them all.

If rules have changed then change the instructions. The rules have not been changed. NASA AVOSS is a possible program to study. AFS may be able to help with briefings.

**123** – A briefing was not available for this meeting to discuss the A380 planning. The committee has expressed interest in the FAA’s position on ICAO’s standards of separation for the A380 for possible adoption into this AOC.

**124** - A briefing was not available for this meeting. In addition, the committee has expressed interest in the FAA’s position on ICAO’s standards of separation for the A380 for possible adoption into this AOC. Discussions and an FAA briefing will occur at 125 as commitments are being finalized the week of 7/24.

**125** – Owing to the importance and interest of the committee in the subject of wake turbulence and its FAA applications, a new Agenda Item numbered 125-1 will be on all

future agendas for either a written briefing or, if needed, a personal briefing by Steve Lang.

**126** – It was decided that this issue of wake turbulence will be dealt with as a continuing AOC and that Steve Lang, RNAV/RNP Office will brief on this item, if applicable, at each meeting therefore the item is closed.

**127** – AOC's status determined to be closed with periodic briefings given.

**CURRENT STATUS: CLOSED. Continuing as an Agenda Item**

## ATPAC UPDATE

### AREA OF CONCERN 120-1

7/13/05

**SAFETY: No**

**SUBJECT:** Wake Turbulence Rules

**DISCUSSION:** Paragraph 3-9-6 of the 7110.65 addresses Wake Turbulence Separation with opposite direction takeoffs and landings very poorly. There is no mention of an S+ aircraft. What separation does a controller use when and S+ aircraft is involved?

**SUGGESTED ATPAC ACTION:** Change the 7110.65 to include the S+ category I this specific paragraph.

**120**—ATO-T will look into this issue and provide further information in October.

**121**—ATO-T is continuing to look at this matter.

**122**—Due to time constraints this AOC was not covered at this meeting.

**123** – S+ has nothing to do with wake turbulence separation. S+ defined as 12500lb to 40000 lb and considered Large in Class B airspace. In Class D it is considered Large if leading a Small. NATCA will provide further clarification after coordinating with the originator of the AOC.

**124** – NATCA will provide further information and Dave Madison will put out information to clarify that S+ must be treated as a large aircraft.

**125** – Clarification was received from Dave Madison regarding the S+ symbology in and out of Class B airspace.

**126** – Dave Madison could not attend this meeting and will be asked for clarification at 127.

**127** – Scott Proudfoot reviewed the written response to the NATCA query regarding this AOC was satisfied of the explanation and the committee elected to close the AOC.

**CURRENT STATUS:** CLOSED

**IOU:** N/A

## ATPAC UPDATE

### AREA OF CONCERN 120-2

7/13/05

SAFETY: No

**SUBJECT:** Low Altitude Alerts

**DISCUSSION:** When an aircraft is executing a Visual Approach and the controller receives a Low Altitude Alert, there is no phraseology to tell the pilot a suggested action.

**SUGGESTED ATPAC ACTION:** Change the 7110.65 to reflect phraseology to issue to an aircraft when a low altitude alert is given on a visual approach.

**120**—Paragraph 5-14-2 includes the phraseology to be used. Some facilities in the field feel that this can't be used for visual approaches or VFR aircraft.

**RECOMMENDATION #1:** Write an ATB that will clarify the phraseology that should be used.

**121**—The ATB is being rewritten to include a reference to paragraph 2-1-6.

**122**—Review of the draft ATB completed by the committee. Publication will follow.

**123** – ATB is in signature process.

**124** – Per Dave Madison, ATO-T, status was unknown as of this meeting but possibly at the VP level for review.

**125** – Dave Madison was not aware of the status of this AOC.

**126** - Dave Madison was unable to attend this meeting.

#### **2-1-6. SAFETY ALERT**

Issue a safety alert to an aircraft if you are aware the aircraft is in a position/altitude which, in your judgment, places it in unsafe proximity to terrain, obstructions, or other aircraft. Once the pilot informs you action is being taken to resolve the situation, you may discontinue the issuance of further alerts. Do not assume that because someone else has responsibility for the aircraft that the unsafe situation has been observed and the safety alert issued; inform the appropriate controller.

#### ***NOTE-***

**1.** *The issuance of a safety alert is a first priority (see Para [2-1-2](#), Duty Priority) once the controller observes and recognizes a situation of unsafe aircraft proximity to terrain,*

*obstacles, or other aircraft. Conditions, such as workload, traffic volume, the quality/limitations of the radar system, and the available lead time to react are factors in determining whether it is reasonable for the controller to observe and recognize such situations. While a controller cannot see immediately the development of every situation where a safety alert must be issued, the controller must remain vigilant for such situations and issue a safety alert when the situation is recognized.*

**2.** *Recognition of situations of unsafe proximity may result from MSAW/E-MSAW/LAAS, automatic altitude readouts, Conflict/Mode C Intruder Alert, observations on a PAR scope, or pilot reports.*

**3.** *Once the alert is issued, it is solely the pilot's prerogative to determine what course of action, if any, will be taken.*

**a.** *Terrain/Obstruction Alert. Immediately issue/initiate an alert to an aircraft if you are aware the aircraft is at an altitude which, in your judgment, places it in unsafe proximity to terrain/obstructions. Issue the alert as follows:*

***PHRASEOLOGY-***

*LOW ALTITUDE ALERT (call sign),*

*CHECK YOUR ALTITUDE IMMEDIATELY.*

*THE (as appropriate) MEA/MVA/MOCA/MIA IN YOUR AREA IS (altitude),*

*or if an aircraft is past the final approach fix (nonprecision approach),*

*or the outer marker,*

*or the fix used in lieu of the outer marker (precision approach),*

*and, if known, issue*

*THE (as appropriate) MDA/DH IS (altitude).*

***Note –***

*In the instance of a VFR aircraft or one on a visual approach, there may not be an applicable minimum altitude to issue in such an advisory.*

**Alternative 2:**

***PHRASEOLOGY-***

*LOW ALTITUDE ALERT (call sign),*

*CHECK YOUR ALTITUDE IMMEDIATELY.*

Also, if applicable, issue one of the following altitudes:

*THE MEA/MVA/MOCA/MIA IN YOUR AREA IS (altitude),*

*or if an aircraft is past the final approach fix (nonprecision approach),*

*or the outer marker,*

*or the fix used in lieu of the outer marker (precision approach),*

*and, if known, issue*

*THE (as appropriate) MDA/DH IS (altitude).*

**RECOMMENDATION:** Suggested phraseology was submitted and is subject to the committee's approval for action and appears below.

#### **2-1-6. SAFETY ALERT**

**Issue a safety alert to an aircraft if you are aware the aircraft is in a position/altitude which, in your judgment, places it in unsafe proximity to terrain, obstructions, or other aircraft. Once the pilot informs you action is being taken to resolve the situation, you may discontinue the issuance of further alerts. Do not assume that because someone else has responsibility for the aircraft that the unsafe situation has been observed and the safety alert issued; inform the appropriate controller.**

#### ***NOTE-***

***1. The issuance of a safety alert is a first priority (see Para [2-1-2](#), Duty Priority) once the controller observes and recognizes a situation of unsafe aircraft proximity to terrain, obstacles, or other aircraft. Conditions, such as workload, traffic volume, the quality/limitations of the radar system, and the available lead time to react are factors in determining whether it is reasonable for the controller to observe and recognize such situations. While a controller cannot see immediately the development of every situation where a safety alert must be issued, the controller must remain vigilant for such situations and issue a safety alert when the situation is recognized.***

***2. Recognition of situations of unsafe proximity may result from MSAW/E-MSAW/LAAS, automatic altitude readouts, Conflict/Mode C Intruder Alert, observations on a PAR scope, or pilot reports.***

***3. Once the alert is issued, it is solely the pilot's prerogative to determine what course of action, if any, will be taken.***

**a. Terrain/Obstruction Alert. Immediately issue/initiate an alert to an aircraft if you are aware the aircraft is at an altitude which, in your judgment, places it in unsafe proximity to terrain/obstructions. Issue the alert as follows:**

#### ***PHRASEOLOGY-***

***LOW ALTITUDE ALERT (call sign),***

***CHECK YOUR ALTITUDE IMMEDIATELY.***

***THE (as appropriate) MEA/MVA/MOCA/MIA IN YOUR AREA IS (altitude),  
or if an aircraft is past the final approach fix (nonprecision approach),  
or the outer marker,  
or the fix used in lieu of the outer marker (precision approach),  
and, if known, issue***

***THE (as appropriate) MDA/DH IS (altitude).***

*Note –*

**In the instance of a VFR aircraft or one on a visual approach, there may not be an applicable minimum altitude to issue in such an advisory.**

**Alternative 2:**

***PHRASEOLOGY-  
LOW ALTITUDE ALERT (call sign),***

***CHECK YOUR ALTITUDE IMMEDIATELY.***

**Also, if applicable, issue one of the following altitudes:**

***THE MEA/MVA/MOCA/MIA IN YOUR AREA IS (altitude),  
or if an aircraft is past the final approach fix (nonprecision approach),  
or the outer marker,  
or the fix used in lieu of the outer marker (precision approach),  
and, if known, issue***

***THE (as appropriate) MDA/DH IS (altitude).***

**127 – The committee agreed on the above recommendation and it will be presented to ATO-T for review or determination of current status.**

**CURRENT STATUS:** Under review or ATB being written by ATO-T.

**IOU:** ATO-T to check status.

## ATPAC UPDATE

### AREA OF CONCERN 120-3

7/13/05

**SAFETY: No**

**SUBJECT:** The Washington DC Air Defense Identification Zone (ADIZ)

**DISCUSSION:** Since the beginning of the ADIZ, procedures in the 7110.65 have been very unclear. They are not consistent with the instruction controllers are receiving from FAA management. If we continue to operate under the direction of the FAA without the proper guidance in the 7110.65, the controllers will have no recourse in the event of an incident or accident.

**SUGGESTED ATPAC ACTION:** Change the 7110.65 to reflect the way the ADIZ is being handled on a daily basis at PCT TRACON. Suggested language has already been submitted to the ATO-T Procedures Office at the FAA.

**120**—ATO-T believes this may have already been answered. Pilots have been given adequate information about the ADIZ. Several reasons it shouldn't be in the 7110.65 include limited area of use and use of beacon codes in the ADIZ. A change to 9-3-10 will not educate the pilots that they will not receive AT services if they are given a squawk, while assuming they are getting them.

After more discussion the committee decided it needed further information on what the real issues are. ATO-T, ALPA and NATCA will do further research and provide more information at the next meeting.

**121**—Was there a recent NPRM on Part 93 concerning domestic ADIZs? If it succeeds we should have clearer procedures on ADIZs.

ATO-T will look into the language.

**122**—NPRM is still open. Comment period will end in February.

**123** – Over 22,000 comments have been received on this matter. All were negative. Currently they are being summarized in approximately 7-10 different categories. Responses will follow. Security agencies are being briefed.

**124** - Security agencies are being briefed regarding the ADIZ. Scott Proudfoot, NATCA from PTC, advised of PTCN 7110.35A dated 4/12/05, that prohibits controllers from issuing safety advisories to aircraft on ADIZ generated discreet codes. The group reviewed the Notice and could not interpret it the same way. Nancy Kalinowski will discuss with Dave Madison for clarification and possible briefing at 125.



**125** – The committee discussed PCT NOTICE 7110.35A (or B) and has come to the conclusions that:

The committee believes that there exists among FAA personnel the idea that the provisions of this notice, particularly Para. 7-3, preclude or forbid the issuance of a safety advisory to ADIZ aircraft on their frequency. The committee takes the position that the over-arching responsibility under Section 2 – General, specifically 2-1-6, Safety Alerts, is still applicable, regardless of whether any other services are being provided, such as the “basic radar services” referred to in 7-3.

The committee further cites the Notice’s paragraph 5, which states clearly that the Notice’s provisions do not supersede or replace anything in existing Orders (such as 7110.65). Even without a statement to that effect in the notice, the committee believes that the fundamental responsibility for a safety alert to a known aircraft about a known hazardous situation could not be avoided or denied by such a notice anyway.

**126** – Scott Proudfoot will obtain a current copy of the PCT Notice for review at 127 and this AOC may be combined with AOC 120-3.

**RECOMMENDATION 1:**

- a. PCT Notice 7110.35A (or B) be revised to state clearly that safety alerts remain a first-priority responsibility and are not precluded by Para. 7-3 of this notice.**
- b. Controllers at PCT be advised of this clarification by an appropriate, auditable method.**

**RECOMMENDATION 2: The following should be added to PCT N7110.35: ADIZ aircraft shall not be advised of radar contact, therefore they should be treated as in a non-radar environment. This provision notwithstanding, Para. 2-1-6 requirements still apply, however. Low altitude and other safety alerts shall still be issued as necessary.**

**127** – Discussion went back and forth from the ADIZ to safety alerts. Scott Proudfoot is satisfied that upcoming changes to the ADIZ and radar procedures will make this AOC moot.

**CURRENT STATUS: CLOSED**

**IOU: N/A.**



## ATPAC UPDATE

### AREA OF CONCERN 123-2

4/19/06  
SAFETY: No

#### **SUBJECT: Aircraft Vertical Performance Data**

**DISCUSSION:** Paragraph 4-4-9d of the AIM contains broad guidance for pilots relating to aircraft descent and climb rates. Specifically; the second sentence of the paragraph begins with the words “*Descend or climb at an optimum rate consistent with the operating characteristics of the aircraft.....*” This phrase is all encompassing and does adequately recognize that specific climb and descent performance criteria is largely controlled by flight management system vertical guidance programs, aircraft type, and specific operator procedures. Therefore, specific performance criteria are not included in the paragraph, nor are there any regulatory requirements relating to this subject. Most pilot operations manuals only contain information extracted from paragraph 4-4-9 relating to a requirement to notify ATC if a climb or descent of at least 500ft per minute cannot be sustained.

However, Appendix A of FAA Order 7110.65 contains climb and descent figures for most aircraft operating in the ATC system. If the purpose of this information is to provide controllers guidance on what performance they may expect from aircraft they are controlling, they may be working with erroneous data. Also, Note 2 of paragraph 4-5-7e of FAA Order 7110.65, refers to descent rates contained in the AIM: “*Controllers need to be aware that the descent rates in the AIM are only suggested and aircraft will not always descend at those rates.*” ALPA believes that this paragraph was originally intended to refer to the performance figures contained in Appendix A of 7110.65, as there does not appear to be any correlation to what is contained in the AIM.

**SUGGESTED ATPAC ACTION:** That ATPAC review this information and recommend that Note 2 of paragraph 4-5-7e, FAAO 7110.65 either be deleted or changed to pertain to the data contained in Appendix A of the Order, and, that the data contained in Appendix A be reviewed to insure it reflects the most accurate and complete performance information for controller guidance.

**123** – Chart needs to be updated or removed. Each chart is based on certification. How pilots fly it can be different. Appendix redone when LAHSO was being worked. ATO-T will coordinate with Certification, then evaluate whether chart should remain.

**124** - ATO-T will coordinate with Certification then evaluate whether chart should remain.

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – The current status of this item is unknown and should be worked by ATO-T.

**127** – Ben Grimes advised the committee that ATO-T is currently working this issue with ATO-E and Flight Standards. A status report will be sought for 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION:** Chart needs to be updated or removed.

**IOU:** ATO-T will coordinate with ATO-E and Flight Standards, then evaluate whether chart should remain.

## ATPAC UPDATE

### AREA OF CONCERN 123-3

4/19/06

SAFETY: No

**SUBJECT:** Beacon Code Assignments for VFR Aircraft

**DISCUSSION:** Aircraft, generally, fly in one of two roles:-

1. An aircraft is flying from A to B Via C,D,E,F (En-Route flying)
2. An aircraft is flying from a location to perform a task and return. (Mission flight)

At present the air traffic system allows for type 1 traffic (En-Route) by allowing aircraft to squawk the code 1200 to indicate to SSR that the aircraft is not under control and that it is VFR on it's own navigation. This allows controllers to identify the aircraft and its whereabouts to any traffic currently under control. This traffic generally tends to remain at a constant altitude, speed & heading so the controller can predict its intended path.

Aircraft adopting flight role two, (Mission flight), however, will not tend to maintain predictable height, speed or direction when in performance of the intended mission.

Examples of such flights are :-

1. Student flights when practicing maneuvers, or simulated Instrument work.
2. Crop Dusting
3. Fire suppression
4. Parachute dropping
5. Aerobatic flight

Flight to and from the intended mission site will however, generally, be of type 1 (En-Route flight).

An approach controller will have no problem fitting VFR-1200 traffic into a traffic flow if the aircraft is acting in a predictable manner. The problem comes when the aircraft is changing its flight parameters often, and in an unpredictable fashion. In these circumstances the controller has to deduce that the aircraft is not En-route and that special attention should be given to the flight path of that particular aircraft. Alternatively VFR traffic that is performing a mission has the option of contacting the approach controller getting accepted and monitoring the frequency for traffic alerts. The initial conversation between the pilot and the controller can often take RT time for both pilot and controller to understand the intentions of the pilot, thus blocking valuable frequency time. Also it places an additional workload on the controller and the pilot both who are concentrating on the mission at hand.

**SUGGESTED ATPAC ACTION:** I propose that we adapt the usage of the standard VFR-1200 system to allow controllers to identify traffic that is operating unpredictably as follows.

**Example.**

A student pilot departs the home field with 1200 selected on his/her transponder. When the area of intended practice is reached the student prepares for the practice session. As part of this preparation the student would select an alternate, standard code on the transponder. A controller would see this change and immediately be aware that the flight parameters of this trace will change, and a wider berth may be required for this traffic. During this time the controller could warn of maneuvering traffic with possible observed height details, which would indicate to anyone under control exactly what it says. When the student has finished the practice session and is ready to return home then 1200 is again selected for the return flight.

**Advantages.**

This system would allow for a complex indication of intentions between the aircraft and the controller without contact needing to be made. Of course, there will be times when direct contact is appropriate but generally I think that this proposition would add generally to the safe operation of aircraft on different mission profiles occupying the same airspace.

**Notes.**

This scheme is already adopted in many other areas of the world. For example, JAR countries support a VFR code of 7700. The alternate code for use for maneuvering flight is 7704. An obvious choice for the US would be 1204. This will only use one code and provide for a complex RT sequence to be replaced by a single transponder code change. As an aerobatic pilot I would feel much better that any controllers in my area were aware of the nature of my flight without having to call them all up. I suggest that this one item would be voluntary and will increase safety due to increased situational awareness of the controllers.

**123** – Discussions centered on the reliability of the codes and the liability in calling traffic on what may actually be an outdated code instead of a current one thereby giving the controller inaccurate information. Many of special areas are already chartered making the suggestion practically moot.

AOPA took the IOU to write a letter for the chair to send to the proponent thanking them for the input however non-adoption was recommended.

**124** – AOPA will provide committee with copy of letter to their member to close AOC.

**CURRENT STATUS: NON-ADOPTED**

## ATPAC UPDATE

### AREA OF CONCERN 123-4

4/19/06  
SAFETY: No

#### **SUBJECT: Speed Assignment Procedures for Arriving Aircraft**

**DISCUSSION:** Neither FAA Order 7110.65 nor the AIM contains clear guidance for controllers or pilots relating to airspeed management during STAR/RNAV arrivals. Specifically, when an airspeed is issued by ATC for sequencing, it is not clear when a pilot may reduce that airspeed in order to comply with regulatory airspeeds contained at fixes depicted on the arrival chart. While specific procedures relating to altitude management during such arrivals are included in both publications, the same type of guidance for airspeed management is not. Pilot reports and local procedures implemented by an FAA Center confirm this problem.

ALPA believes this issue can be resolved by revising FAAH 7110.65, Para 5-7-2, and AIM section 4-4-11 as follows:

**7110.65, Para 5-7-2:** Add sub paragraph **e.** as follows:

*“If a STAR/arrival procedure is issued after a speed assignment, pilots will be expected to comply with speed restrictions contained on the published arrival procedure. If ATC assigns a speed for sequencing **after** a STAR or other transition arrival procedure has been issued, pilots are expected to maintain that speed until further advised.*

*It is the controller’s responsibility to ensure speed assignments are managed to allow pilot compliance with 14 CFR Section 91.117.”*

**AIM section 4-4-11:** Add new paragraph **f.** as follows and adjust remaining subparagraphs alphabetically as required: The existing **NOTE** following the current paragraph 4-4-11e, Example 2, should now follow the proposed paragraph **f.**

*“When a STAR/RNAV transition is issued **after** a speed assignment, pilots should comply with speed restrictions contained on the published arrival. If ATC assigns the speed **after** the clearance for a published arrival procedure, pilots are expected to maintain that speed until further advised.”*

**SUGGESTED ATPAC ACTION:** That ATPAC review this issue and consider approving the above recommendations.

**123** – Controllers assign what they need and are aware of the restrictions on the procedures. Discussion on DFW arrivals and constraints on route in relation to speed. Needs to be education of both pilots and controllers.

**RECOMMENDATION #1: Add appropriate notes to the AIM and the 7110.65.**

124 – ATPAC further refined its recommendation as follows:

**7110.65, Para 5-7-2:** Add sub paragraph e. as follows:

*“When a SID/STAR is issued after a speed assignment, pilots will comply with speed restrictions contained on the published procedure. When a speed is assigned **after** a SID/STAR has been issued, pilots will maintain that speed until further advised. It is the pilot’s responsibility to ensure speed assignments are managed to permit compliance with 14 CFR Section 91.117.”*

**AIM section 4-4-11:** Add new paragraph f. as follows and adjust remaining subparagraphs alphabetically as required: The existing **NOTE** following the current paragraph 4-4-11e, Example 2, should now follow the proposed paragraph f.

*““When a SID/STAR is issued **after** a speed assignment, pilots will comply with speed restrictions contained on the published procedure. When a speed is assigned **after** a SID/STAR has been issued, pilots will maintain that speed until further advised.*

125 – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

126 – This item was not reviewed at 126. Steve Alogna will check status and report at 127.

127 – Ben Grimes agreed to present to Dave Madison for resolution/clarification.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION: Add appropriate notes to the AIM and the 7110.65.**

**IOU: ATO-T**



## ATPAC UPDATE

### AREA OF CONCERN 123-5

4/19/06

SAFETY: No

**SUBJECT:** Clarification of LLWS versus Gust Spread

#### **DISCUSSION:**

1. A fundamental difference between LLWS and Gust Spread lies in its predictability and the expectation by the pilot. LLWS manifests itself as a predictable, abrupt gain or loss of airspeed of 20 kts or more within 2000 ft agl; but not both. It is usually encountered along a sloping frontal surface near the ground or at the top of an inversion layer. Pilots along the same glideslope separated by minutes or seconds will experience similar gains or losses in airspeeds. On the other hand, gust spread associated with windy, turbulent flow usually results in gains **and** losses of airspeed which may exceed 20 kts within 2000 ft agl. Although it feels like LLWS to the pilot; the nature of the phenomena does not allow the forecaster to tell the pilot whether to expect a gain or a loss of airspeed on final approach. Indeed, pilots along the same glideslope separated only by minutes or seconds may experience opposite effects with respect to gain and loss of airspeed just prior to landing.
2. A potentially serious problem arises in that when a pilot mistakenly reports Gust Spread as LLWS in PIREPs, it gets reported as fact to other users in the aviation and meteorological communities. When Gust Spread are reported as LLWS some aviation meteorologists feel obliged to put it into Terminal Aerodrome Forecasts (TAFs) and Area Forecasts (FA's). Thus a negative feedback loop is created making it difficult to dispose of this mis-reported and over-forecast weather phenomenon; LLWS.
3. Although Gust Spread feels like LLWS at the time of its occurrence, the pilot must be prepared to handle the unknown; **gains or losses** in airspeed just prior to landing, whereas with LLWS the pilot need only be prepared to handle one or the other (not both) on final. Thus on days where pilots report gains and losses in airspeed of 20 kts or more, Gust Spread (GS) may be an appropriate way to forecast wind speed fluctuations of plus/minus 20 kts or more within 2000 feet agl. Thus a TAF wind that reads: 24020G35KT (GS +/- 20 kt) may be a simple way to denote gains/losses of airspeed of 20 kts or more on final. The pilots know to be prepared for either condition just prior to landing. LLWS as it is currently used in TAFs and FAs is fine, but does not deter the pilots from reporting LLWS when in fact the condition does not exist.
4. Introducing the concept of Gust Spread and placing it into TAFs and FA's would help to provide a clearer picture of low level winds to meteorologists and aviators; thus enhancing flying safety at airports. Over time and with some education, pilots, and those people placing PIREPs into the dissemination system could make the distinction between

the two phenomena and give the flying community at large a better feel for tricky landing conditions at airfields nationwide.

**SUGGESTED ATPAC ACTION:** ATPAC review and determine the merit of this proposal.

**123** – LLWS is defined by Meteorologists as predictable and measurable with weather conditions but “Gust Spreads” are not and therefore should be recognized in transmitted/published advisories regarding such events.

ATPAC found merit in this suggestion and will bring it to the attention of NCAR by a memo from the chair to the FAA.

**124** – Memo from the chair has been written and ATPAC awaits a reply.

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Awaiting input from AOC proponent.

**127** - Awaiting input from AOC proponent.

**CURRENT STATUS:** DEFERRED

**RECOMMENDATION:** NONE Pending further information from proponent.

**IOU:** Proponent

## ATPAC UPDATE

### AREA OF CONCERN 123-6

4/19/06

SAFETY: Yes

**SUBJECT:** Precision Obstacle Free Zone (FAA Order 7110.65, Paragraph 3-7-6)

**DISCUSSION:** The procedure is not realistic and is a definite safety hazard. The only realistic control instruction is: "Go around." You can't expect the pilot to adjust his minima this late in the approach.

**SUGGESTED ATPAC ACTION:** That ATPAC recommend that the FAA rescind this paragraph immediately through a GENOT and direct controllers to issue go-around instructions if the POFZ is not clear.

**123** – The committee expressed concern that the dimensions and activity in this "zone" may change on short final and change the actual minimums for the approach that may be contrary to the operator's.

ATO-T will work the issue through a GENOT and report to the committee in July.

**124** – The paragraph in question was rescinded by GENOT at the committee's request. ATPAC will investigate status with NCAR.

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Subsequent to the meeting this item was published by ATO-T despite objections by ATPAC whose members recommended a controller initiated go around when conditions warranted and traffic was in the POFZ.

**127** – Further discussion in the committee pondered the consequences of a directed go-around versus an advisory to the aircraft at a time in flight that would be critical from the standpoint of side-and down drift potential. The consensus was that the committee would present its concepts to Flight Standards for the appropriate coordination with ATO-T for FAA to determine a point where the directed go-around would occur versus inside that predetermined point where the approach/landing would continue unabated. Wilson Riggan and Sabra Kaulia drafted a suggested ATPAC recommendation for presenting to ATO-t through Flight Standards. The draft will be reviewed at 128.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION: None pending agreement of committee regarding draft.**

**IOU: ATPAC**

## ATPAC UPDATE

### AREA OF CONCERN 123-7

4/19/06

SAFETY: Yes

**SUBJECT:** Four Digit Express Carrier Call signs

**DISCUSSION:** Moderate to busy terminal facilities and en route sectors are experiencing an increasing problem with very similar sounding, 4-digit call signs with express carrier companies. Some carriers have been able to drop the first digit of the call sign when every flight number begins with the same first digit, but those carriers that use different banks of flight numbers cannot. The problem with these high concentrations of 4-digit call signs is frequent miscommunications due to the fact that all of the call signs look and sound somewhat alike. Example: SKY6845, SKW8845, SKW6885, SKW6485. Example: LOF8036, LOF8026, LOF8040, LFO8044. Example: TCF7744, TCF7444, TCF7774, TCF7770. Too often pilots reply to clearances intended for other aircraft due to the similar sounding call signs.

**SUGGESTED ATPAC ACTION:** There needs to be some encouragement by the FAA or the RAA/ATA to take into consideration the difficulties with communications with the concentration of similar sounding call signs nationwide. For the express carriers that have all of their flight numbers in the same "1,000 bank" of numbers, they should be required to drop the first digit for ATC purposes. This could be done in coordination with flight dispatchers. For those express carriers that have flight numbers in different banks or series of numbers, an option would be to replace the first 2 digits with a single letter at the end of the call sign. Example: SKW6845 would be SKW45G, SKW6485 would be SKW85H, SKW8885 would be SKW85G, etc. Assign a single letter to the first 2 number combination in a flight number so that it is consistent nationwide. SKW6845 would be SKW45G just as COM6845 would be COM45G. Inconsistency between different carriers would be very difficult to manage.

**123** – Can a working group in the PARC address this? The DCP (Pilot Controller Phraseology) subgroup may have human factors information or other input. (Contact is RNAV shop). CDM may also be another possibility for working the issue with AFS involvement.

**124** – ATO-S will be queried to determine if sufficient human factors studies exist to warrant a recommendation through appropriate channels to request 3-digit call signs be utilized vice 4-digit. NASA also expressed concurrence with the AOC and the need for action. The committee will consider asking the CDM group to address this item.

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Further discussion was had regarding the human factors involved and the confusion caused by 4-digit call signs. The committee heard suggestions that we defer to the Collaborative Decision-Making Group for action by the carriers in question. The decision was made to draft a letter to Mike Cirillo for his action.

**127** - A draft proposed letter to Mike Cirillo was completed but not approved by the committee due to insufficient time.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION #1: FAA investigates solutions through appropriate channels.**

**RECOMMENDATION #2: Action be initiated to investigate and remedy.**

**IOU: ATPAC will review/approve draft letter to Mike Cirillo at 128.**

## ATPAC UPDATE

### AREA OF CONCERN 124-1

7/12/06  
SAFETY: No

**SUBJECT:** Controller Identification of Aircraft Types

**DISCUSSION:** ALPA has received reports from pilots that indicate controllers are issuing traffic using a generic type of identifier such as “RJ” or “Regional Jet” as opposed to the phraseology required by FAAO 7110.65, Paragraph 2-4-21. ALPA further contends that due to the significant differences in these types of aircraft it is no longer practical to describe them in such generic terms as is being done in the NAS. With some “RJs” and/or “Regional Jets” carrying from 50 to over 100 passengers, the likelihood of misidentification of types when traffic is issued, increases and could create a hazard during many critical phases of flight such as visual approaches where one aircraft must visually identify the traffic to follow. It was felt that sufficient guidelines are available for controllers in 7110.65 but that a refresher of current issues may be helpful.

**SUGGESTED ATPAC ACTION:** That ATPAC coordinate with

**RECOMMENDATION #1:** Mandatory training for controllers in the form of an Air Traffic Bulletin or other required training be accomplished to ensure this situation is brought to the attention of controllers and corrected.

125 – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

126 – After discussion it was determined that Steve Alogna will draft a recommendation for ATPAC to present to ATO-T for an MBI/ATB.

127 – A draft proposed letter to Mike Cirillo was completed but not approved by the committee due to insufficient time.

**CURRENT STATUS:** DEFERRED

**RECOMMENDATION:** The following information be included in an MBI/ATB:  
\*F/ET The generic term “Regional Jet” of the early 90’s was correctly described as a large corporate-sized airplane capable of carrying 50 passengers and powered by 2 engines that were usually stationed under the vertical stabilizer. The Bombardier CRJ-100 was such an airplane. As the need for a larger version of the “RJ” grew so did the airplane itself with other aircraft manufacturers making their own versions. For instance, the newest Bombarier RJ-900 has the same physical shape as the preceding “RJs” but is capable of seating over 85 passengers. The newest Embraer

**entry to this market is the E-195 with engines under the wings as on B737 and seating capacity from 108-122. As you can see issuing traffic on these variants leaves considerable room for interpretation by the pilot. Will the pilot receiving instructions for Visual Separation to follow the “RJ” pick the 50 passenger or the 122 passenger jet behind? Is this the one you want the receiving aircraft to sequence behind or is it the other “RJ?” The accurate identity of these various types of jets is becoming more confusing to the pilot and tower community alike.**

**It is the controller’s responsibility to ensure the positive identification of traffic issued so the pilot may see and/or follow. The only way to make sure the traffic is the one that is intended is to issue the full type description of the traffic such as, “Embraer 195” or “Bombardier CRJ-100.” When you transmit, “Do you have it in sight?” or “Follow the (blank),” be sure both you and the pilot are talking and looking for the correct airplane.**

**IOU: ATPAC will review/approve draft letter to Mike Cirillo at 128.**



## ATPAC UPDATE

### AREA OF CONCERN 124-2

7/12/06

**SAFETY: No**

**SUBJECT:** Class B Irregularities

**DISCUSSION:** ALPA has received pilot reports that relate to ATC procedures with Class B Airspace. These reports focus on the fact that turbine powered aircraft are increasingly being vectored outside of Class B Airspace at many locations which is contrary to the intent of Class B and controllers are not advising pilots they are exiting the protected airspace. ALPA notes that FAR 91-131 states that flight outside Class B Airspace should be, “the exception rather than the rule.” ALPA further stated their concern that controllers may not be fully aware of the speed requirements imposed on the pilot when below the floor and/or outside the lateral limits of Class B. Specific mention was made of procedures at ATL, DTW, and SNA as well as others unnamed. In discussion, the committee expressed concern that controllers and pilots alike are not remembering the 200 kt speed restriction under Class B shelves. Further concern was expressed about the inherent danger to/from small aircraft circumnavigating below/around lower segments of Class B airspace and the fact that utilizing this airspace for Class B traffic compromises the traffic segregation upon which the Class B concept is based.

Further discussion centered on identifying two separate needs – long-term and immediate. Long-term, the referenced Class B areas need to be enlarged to accommodate their new traffic patterns which were generated by new runways. FAA indicates that those efforts have begun, along with procedures to make future airspace changes more timely with additional new runways or traffic patterns.

In the meantime, both communities (pilots and controllers) need to be reminded of the requirements relating to advising pilots when they are being vectored out of Class B airspace, the resulting speed limit if they are under a shelf, and the traffic implications of being there.

**SUGGESTED ATPAC ACTION:** **Mandatory training for controllers in the form of an Air Traffic Bulletin or other required training be accomplished to ensure this situation is brought to the attention of controllers and corrected.**

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Expecting withdrawal by proponent.

**127** – Withdrawn by proponent due to FAA actions taken.

**RECOMMENDATION: Mandatory training for controllers in the form of an Air Traffic Bulletin or other required training be accomplished to ensure this situation is brought to the attention of controllers and corrected.**

**CURRENT STATUS: WITHDRAWN BY PROPONENT.**

**IOU: N/A**

**ATPAC UPDATE**

**AREA OF CONCERN 124-3**

**7/12/06**  
**SAFETY: No**

**SUBJECT:** Class B Airspace Visual Approach Clearance

**DISCUSSION:** ALPA articulated the concerns of pilots that some are being cleared for visual approaches below the floor of Class B Airspace which violates the tenets of the AIM, Paragraph 3-2-3d 1.

**SUGGESTED ATPAC ACTION:** Awaiting input from Mark Cato.

**RECOMMENDATION:**

**125** – Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – This item not reviewed at 126 and will carry over to 127.

**127** – Withdrawn by proponent due to FAA actions taken.

**CURRENT STATUS:** WITHDRAWN

**RECOMMENDATION:** None

**IOU:** None

## ATPAC UPDATE

### AREA OF CONCERN 125-1

**SUBJECT:** Wake Turbulence Updates

**DISCUSSION:** The committee determined through discussion that wake turbulence issues are extremely important and constantly subject to changes with new aircraft and technologies. In order for the group to keep abreast of the latest developments and studies regarding wake turbulence it was decided that this AOC would be closed and an Agenda Item number 125-1 would replace it.

**SUGGESTED ATPAC ACTION:** It was determined that this Agenda Item will be placed on each meeting's agenda and a written or personal report from Steve Lang or a suitable replacement may be requested. Steve Alogna will check prior to each meeting and determine with the chair which form of report is sufficient.

**CURRENT STATUS:** CLOSED.

**RECOMMENDATION:** Place on each meeting's agenda

**IOU:** ATO-R

ATPAC UPDATE

## AREA OF CONCERN 125-2

**SUBJECT:** Gear Down Advisory

**DISCUSSION:** Representatives from AOPA, Navy, and Air Force advocated the safety aspects of the advisory and that despite occurrences at non-towered airports it was felt that the value of the advisory would carry-over from towered airports. The discussion questioned the cost-benefits and the specifics of gear-up landings. In addition, discussions centered on FAA liability, pilot responsibility, and the problems with change. Air Force and Navy reps that use the procedure were unanimous in that this is a good procedure. FAA (ATO-T) and NATCA think this is a bad idea. FAAH 7110.65, Para 2-1-24 states that the reminder does not put any responsibility on the controllers—it is still a pilot responsibility.

**SUGGESTED ATPAC ACTION:** Members were asked to accumulate qualitative and quantitative evidence that this is in fact an issue in the NAS.

**RECOMMENDATION:** Wait for further definitive information and discuss at 126.

**126** – Discussion regarding where further definitive data may be obtained to support an ATPAC recommendation.

**127** – More data is expected at 128 in order to make case for submission to FAA.

**CURRENT STATUS:** DEFERRED.

**IOU:** Ms. Heidi Williams and Harry Hodges will gather more information to see the real cost and frequency of the issue. ASRS will look at the last 3 years to see real numbers including mechanical vs. pilot error. David River will obtain information from an insurance underwriter that may not be available until 128.

## ATPAC UPDATE

### AREA OF CONCERN 125-3

**SUBJECT:** Inconsistent RNAV Application Procedures

**DISCUSSION:** Charts were presented that displayed RNAV procedures and anecdotal information regarding controllers not adhering to them. This non-adherence and/or inaccurate application caused pilots to utilize NAVAIDs such as MMs (ATL) that were for a different approach, caused confusion regarding application of speed and conformance to the SID in the case of radar vectors, and depending on the particular FMS, caused waypoints to be dropped when direct clearances or vectors were issued.

**SUGGESTED ATPAC ACTION:** Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Discussions were held with Jeff Williams and will be brought to the attention of ATO-T.

**127** – The committee opined that there is a disconnect between operational groups and planning groups and ATPAC. Other planning and advisory groups include PARC, CDM, JPDO, AWG, and RNAV (CNS) Task Force. It was acknowledged by the group that the importance of RNAV applications will grow and that ATPAC should ensure they are fully engaged in planning and operations in accordance with the charter.

**CURRENT STATUS:** DEFERRED

**RECOMMENDATION:** NONE

**IOU:** ATO-R/RNAV/RNP Office. Jim Arrighi agreed to look into the procedures used by Miami Center regarding SIDs. John Timmerman will discuss these disconnects with Nancy Kalinowski and report at 128. Steve Alogna will obtain information about the other groups and disseminate to ATPAC membership.

ATPAC UPDATE

## **AREA OF CONCERN 125-4**

**SUBJECT:** Confusion on Descent During Non-Precision Approaches

**DISCUSSION:** Discussion was primarily concerning possible misunderstandings when the pilot was not given definitive altitude guidance in relation to a published segment of a non-precision approach.

**SUGGESTED ATPAC ACTION:** Obtain clarification of the question and collect data regarding this issue.

**126** – Discussion with visitor Jeff Williams concluded that a fix on the published approach must be utilized and in the aircraft database. Steve Alogna will look into the recurrent training of controllers regarding this AOC.

**127** – Steve Alogna’s investigation of this AOC found that an MBI through a CBI has been developed and is being disseminated to controllers for action.

**CURRENT STATUS:** DEFERRED

**RECOMMENDATION:** Clarification of issue

**IOU:** ATO-R Steve Alogna will obtain copy of the MBI for the committee’s review at 128.

**ATPAC UPDATE**

## AREA OF CONCERN 125-5

**SUBJECT:** Controller Immunity for ARSR

**DISCUSSION:** Brief discussion was entertained.

**SUGGESTED ATPAC ACTION:** Due to insufficient time for the appropriate discussions this AOC will be further deferred until 126.

**126** – Discussions centered around the concept that input regarding accidents/incidents ODs/Es is vital to determine the health of the NAS. Further information was needed on Article 62 in the NATCA/FAA Contract.

**127** – Information gathering was done by Steve Alogna and John Timmerman added insight into this issue. The FAA and NATCA are apparently at odds as to the exact description and extent of controller immunity as it existed in the past labor agreement. John advised that this item is being discussed within the context of the SMS manual and worked at the highest levels of FAA management and that it was thought that this item is outside the purview of the committee's charter.

**RECOMMENDATION:** INFORMATION GATHERING ON FAA'S POSITION.

**CURRENT STATUS:** Withdrawn

**IOU:** N/A

ATPAC UPDATE



## AREA OF CONCERN 126-1

**SUBJECT:** ATIS Integrity

**DISCUSSION:** Examples of erroneous ATIS messages were given. On occasions mentioned, conflicting data was transmitted regarding approaches in use and airport closure.

**SUGGESTED ATPAC ACTION:** Craft a recommendation for ATPAC concurrence and submission to ATO-T for review.

127 – The AOC states that new automated ATIS equipment may be the cause of misinformation to aircraft on airport conditions. Examples lead the committee to believe that the limitation of options on messages transmitted do not permit an accurate description of conditions and force incomplete or erroneous messages to be transmitted.

**RECOMMENDATION:** That an MBI be developed to make controllers aware of possible shortcomings in automated ATIS functions and the actual operations of ATIS. Also, that prior to broadcast a review of the proposed broadcast be reviewed by a person other than the originator whenever feasible in accordance with FAAO 7110.65, para 2-9-1 b and para 10-4-1 c and FAAO 7210.3.

**CURRENT STATUS:** DEFERRED

**IOU:** ATO-R will obtain a briefing from ATO-T regarding the capabilities of the automated ATIS.

ATPAC UPDATE

## **AREA OF CONCERN 126-2**

**SUBJECT:** Procedures for Use of Time to Meet Restrictions

**DISCUSSION:** The committee looked at current regulations that mandate the controller must issue the clock time to the restricted aircraft and the time the aircraft must comply with the given restriction.

**SUGGESTED ATPAC ACTION:**

**RECOMMENDATION:** ATPAC opined that giving the aircraft a time to reach/leave an altitude followed by the minutes needed to achieve would suffice and not complicating the issue with clock time.

127 – David Young advised that this AOC is currently being assessed by ATO-E.

**CURRENT STATUS:** DEFERRED

**IOU:** David Young will report on the status of this AOC at 128.

**ATPAC UPDATE**

## AREA OF CONCERN 127-1

**SUBJECT:** Abbreviated Departure Clearances (Cleared as Filed).

**DISCUSSION:** Charts were presented that displayed RNAV procedures and anecdotal information regarding controllers not adhering to them. This non-adherence and/or inaccurate application caused pilots to utilize NAVAIDs such as MMs (ATL) that were for a different approach, caused confusion regarding application of speed and conformance to the SID in the case of radar vectors, and depending on the particular FMS, caused waypoints to be dropped when direct clearances or vectors were issued.

**SUGGESTED ATPAC ACTION:** Due to insufficient time for the appropriate discussions this AOC will be deferred until 126.

126 – Discussions were held with Jeff Williams and will be brought to the attention of ATO-T.

127 - AOC accepted by committee without recommendation.



### AIR TRAFFIC PROCEDURES ADVISORY COMMITTEE

#### AREA OF CONCERN & AGENDA ITEM Submission Form

(Check one)

Area of Concern → Safety Item?     Yes     No

Agenda Item

**SUBJECT:** Abbreviated Departure Clearances (Cleared as Filed)

**REFERENCES:** FAAO 7110.65, Section 4-3-3 d, NOTE 1;  
AIM Section 5-2-4: PCG Definition “Cleared as Filed”  
AIM paragraph 5-2-4, Abbreviated IFR Departure Clearance Procedures

**DISCUSSION:** FAAO 7110.65, 4-3-3 d, NOTE 1, contains the following statement: “ **SIDs are excluded from “cleared as filed” procedures**”. This statement is confusing since it is imbedded in the Section titled “Abbreviated Departure Clearances,” and the examples given in that section include SIDs assigned in the abbreviated clearances issued. The following is the PCG definition of Cleared as Filed: *“CLEARED AS FILED - Means the aircraft is cleared to proceed in accordance with the route of flight filed in the flight plan, This clearance does not include the altitude SID Transition.”*

While the PCG definition is clear, neither it nor the NOTE referenced above explains how a SID is included in the abbreviated departure clearance when both FAAO 7110.65 and the PCG definition say

they are excluded from such clearances. The AIM, paragraph 5-2-4 d, f, and g.1, does a better job of addressing the issue but it too needs a minor revision.

**RECOMMENDATION:** That ATPAC review this issue and approve the following recommendations:

1. That NOTE 1 in FAAO 7110.65, Section 4-3-3 d. be revised as follows:  
*“Cleared as filed” procedures only apply to the route of flight filed. SIDs and the initial altitude to maintain are appended to an abbreviated clearance when assigned by ATC.”*
2. That the first sentence of AIM 5-2-4, 4, f. be revised as follows:  
*“Cleared to (destination) airport as filed” does NOT include either a SID, SID transition, or the en route altitude filed in the flight plan.”*

Newman,  
Association

Captain Larry  
Air Line Pilots  
March 27, 2007

### **P/C glossary**

**CLEARED AS FILED-** Means the aircraft is cleared to proceed in accordance with the route of flight filed in the flight plan. This clearance does not include the altitude, SID, or SID Transition.

### **AIM 5-2-4. Abbreviated IFR Departure Clearance (Cleared. . .as Filed) Procedures**

a. ATC facilities will issue an abbreviated IFR departure clearance based on the ROUTE of flight filed in the IFR flight plan, provided the filed route can be approved with little or no revision. These abbreviated clearance procedures are based on the following conditions:

1. The aircraft is on the ground or it has departed visual flight rules (VFR) and the pilot is requesting IFR clearance while airborne.
2. That a pilot will not accept an abbreviated clearance if the route or destination of a flight plan filed with ATC has been changed by the pilot or the company or the operations officer before departure.
3. That it is the responsibility of the company or operations office to inform the pilot when they make a change to the filed flight plan.

4. That it is the responsibility of the pilot to inform ATC in the initial call-up (for clearance) when the filed flight plan has been either:

(a) Amended, or

(b) Canceled and replaced with a new filed flight plan.

***NOTE-***

*The facility issuing a clearance may not have received the revised route or the revised flight plan by the time a pilot requests clearance.*

b. Controllers will issue a detailed clearance when they know that the original filed flight plan has been changed or when the pilot requests a full route clearance.

c. The clearance as issued will include the destination airport filed in the flight plan.

d. ATC procedures now require the controller to state the SID name, the current number and the SID transition name after the phrase "Cleared to (destination) airport" and prior to the phrase, "then as filed," for ALL departure clearances when the SID or SID transition is to be flown. The procedures apply whether or not the SID is filed in the flight plan.

e. STARs, when filed in a flight plan, are considered a part of the filed route of flight and will not normally be stated in an initial departure clearance. If the ARTCC's jurisdictional airspace includes both the departure airport and the fix where a STAR or STAR transition begins, the STAR name, the current number and the STAR transition name MAY be stated in the initial clearance.

f. "Cleared to (destination) airport as filed" does NOT include the en route altitude filed in a flight plan. An en route altitude will be stated in the clearance or the pilot will be advised to expect an assigned or filed altitude within a given time frame or at a certain point after departure. This may be done verbally in the departure instructions or stated in the SID.

g. In both radar and nonradar environments, the controller will state "Cleared to (destination) airport as filed" or:

1. If a SID or SID transition is to be flown, specify the SID name, the current SID number, the SID transition name, the assigned altitude/flight level, and any additional instructions (departure control frequency, beacon code assignment, etc.) necessary to clear a departing aircraft via the SID or SID transition and the route filed.

**EXAMPLE-**

*National Seven Twenty cleared to Miami Airport Intercontinental one departure, Lake Charles transition then as filed, maintain Flight Level two seven zero.*

2. When there is no SID or when the pilot cannot accept a SID, the controller will specify the assigned altitude or flight level, and any additional instructions necessary to clear a departing aircraft via an appropriate departure routing and the route filed.

**NOTE-**

*A detailed departure route description or a radar vector may be used to achieve the desired departure routing.*

3. If it is necessary to make a minor revision to the filed route, the controller will specify the assigned SID or SID transition (or departure routing), the revision to the filed route, the assigned altitude or flight level and any additional instructions necessary to clear a departing aircraft.

**EXAMPLE-**

*Jet Star One Four Two Four cleared to Atlanta Airport, South Boston two departure then as filed except change route to read South Boston Victor 20 Greensboro, maintain one seven thousand.*

4. Additionally, in a nonradar environment, the controller will specify one or more fixes, as necessary, to identify the initial route of flight.

**EXAMPLE-**

*Cessna Three One Six Zero Foxtrot cleared to Charlotte Airport as filed via Brooke, maintain seven thousand.*

h. To ensure success of the program, pilots should:

1. Avoid making changes to a filed flight plan just prior to departure.
2. State the following information in the initial call-up to the facility when no change has been made to the filed flight plan: Aircraft call sign, location, type operation (IFR) and the name of the airport (or fix) to which you expect clearance.

**EXAMPLE-**

*"Washington clearance delivery (or ground control if appropriate) American Seventy Six at gate one, IFR Los Angeles."*

3. If the flight plan has been changed, state the change and request a full route clearance.

**EXAMPLE-**

*"Washington clearance delivery, American Seventy Six at gate one. IFR San Francisco. My flight plan route has been amended (or destination changed). Request full route clearance."*

4. Request verification or clarification from ATC if ANY portion of the clearance is not clearly understood.
5. When requesting clearance for the IFR portion of a VFR/IFR flight, request such clearance prior to the fix where IFR operation is proposed to commence in sufficient time to avoid delay. Use the following phraseology:

**EXAMPLE-**

*"Los Angeles center, Apache Six One Papa, VFR estimating"*

**FAAO 7110.65, Paragraph 4-3-3d**

**d.** When no changes are required in the filed route, state the phrase: "Cleared to (destination) airport, (SID and SID transition, as appropriate); then, as filed." If a SID is not assigned, follow with "As filed." Specify the assigned altitude; and, if required, add any additional instructions or information, including final requested altitude if different than assigned except if Pre-Departure Clearance (PDC) is utilized.

**PHRASEOLOGY-**

*CLEARED TO (destination) AIRPORT;*

*and as appropriate,*

*(SID name and number) DEPARTURE,  
THEN AS FILED.*

*MAINTAIN (altitude); (additional instructions or information).*

*If a SID is not assigned,*

*CLEARED TO (destination) AIRPORT AS FILED.  
MAINTAIN (altitude);*

*and if required,*

*(additional instructions or information).*

***EXAMPLE-***

*"Cleared to Reynolds Airport; David Two RNAV Departure, Kingham Transition; then, as filed. Maintain niner thousand. Expect flight level four one zero, one zero minutes after departure."*

*"Cleared to Reynolds Airport as filed. Maintain niner thousand. Expect flight level four one zero, one zero minutes after departure."*

***NOTE-***

***1. SIDs are excluded from "cleared as filed" procedures.***

***2. If a pilot does not wish to accept an ATC clearance to fly a SID, he/she is expected to advise ATC or state "NO SID" in his/her flight plan remarks.***

**P/C Glossary: *CLEARED AS FILED-*** Means the aircraft is cleared to proceed in accordance with the route of flight filed in the flight plan. This clearance does not include the altitude, SID, or SID Transition.

**CURRENT STATUS: DEFERRED**

**RECOMMENDATION: NONE**

**IOU: ATPAC – Review at 128 and craft recommendation.**



**LOCATIONS/DATES FOR FUTURE MEETINGS.** The Chairman announced the following ATPAC meeting schedule:

ATPAC 128: July 24-26, 2007, Room 2A, Bessie Coleman Conference Room, FAA Building 10A, Washington, DC.

ATPAC 129: October, Days TBD, 2007, Washington, DC to coincide with the ATCA Convention.

ATPAC 130: January 15-17, Site anticipated outside of Washington TBD

**ADJOURNMENT:** The meeting was adjourned on January 11 at noon.

AOC 93-6 Runway Incursions by Taxiing Aircraft  
AOC 102-2 Instrument Approach Clearances to Other than IAF  
AOC 105-3 Cleanup of FAR's and AIM  
AOC 108-1 ALPA Safety Concerns Regarding a Recent ICAO Phraseology Change to PANS-ATM  
AOC 112-1 Clarification of "Direct" Clearance  
AOC 114-2 Pilot/Controller Glossary Addition: Comply with Restrictions.  
AOC 116-1 Revision to FAAO 7110.65 and the AIM  
AOC 116-3 ILS Glide Slope Critical Area Advisory  
AOC 116-5 Revision to STAR Order 7100.9D  
AOC 117-1 Definition of the Term "Airborne"  
AOC 118-2 AIM Chapter 7, Section 3, Wake Turbulence  
AOC 118-3 ARTCC Timed Climb Requirements  
AOC 119-1 Runway Incursions – Tower Interpretation of Hold Short Lines and Anticipated Separation  
AOC 120-1 Wake Turbulence Rules  
AOC 120-2 Low Altitude Alerts  
AOC 120-3 The Washington DC Air Defense Identification Zone (ADIZ)  
AOC 123-1 Taxiway Holding Position Marking  
AOC 123-2 Aircraft Vertical Performance  
AOC 123-3 Beacon Code Assignments for VFR Aircraft  
AOC 123-4 Speed Assignment Procedures for Arriving Aircraft  
AOC 123-5 Clarification of LLWS versus Gust Spread  
AOC 123-6 Precision Obstacle Free Zone  
AOC 123-7 Express Carrier Call-Signs  
AOC 124-1 Controller Identification of Aircraft Types  
AOC 124-2 Class B Irregularities  
AOC 124-3 Withdrawn by proponent  
AOC 125-1 Agenda Item: Wake Turbulence  
AOC 125-2 Gear Down Advisory

AOC 125-3 Inconsistent RNAV Application Procedures  
AOC 125-4 Confusion on Descent During Non-Precision Approaches  
AOC 125-5 Controller Immunity for ARSR  
AOC 126-1 ATIS Integrity  
AOC 126-2 Procedures for Use of Time to Meet Restrictions  
AOC 127-1 Abbreviated Departure Clearances (Cleared as Filed)

THE PRECEDING IS CERTIFIED TO BE A TRUE AND ACCURATE SUMMARY  
OF THIS MEETING.

Nancy Kalinowski  
Executive Director, Air Traffic Procedures  
Advisory Committee