

CERTALERT

ADVISORY CAUTIONARY NON-DIRECTIVE

AIRPORT SAFETY AND OPERATIONS DIVISION AAS-300

FOR INFORMATION, CONTACT, Bruce Landry AAS-300, (202) 267-8729

DATE: 11/25/08 No. 08-12
TO: Airport Operators, FAA Airport Certification Safety Inspectors
TOPIC: Safety Risks for Operating Supertugs (TLTV) in the movement area and Air Operations Area (AOA) when towing large air carrier aircraft.

Recently the Federal Aviation Administration (FAA) and industry representatives met to discuss the unique challenges associated with the operation of Towbarless Tow Vehicles (TLTVs) or Supertugs, on the Aircraft Operations Areas (AOA) of 14 CFR Part 139 airports. As a result, several concerns directly impacting airport safety were identified.

Foremost, the illumination of the TLTVs (and towed aircraft) appears inconsistent with guidance provided in 14 CFR Part 91 and advisory circulars. In fact, aircraft have been towed by TLTVs at night and in low visibility with the aircraft navigation/anti-collision lighting turned off. This concern was identified by Air Traffic Control (ATC) and pilots who reported visibility problems of TLTVs, both during daylight hours and hours of darkness. The regulatory requirement to “clearly illuminate” the towed aircraft is outlined in 14 CFR Part 91, General Aviation Operating and Flight Rules, Section 91.209, Aircraft lights. Moreover, rotating beacons on some TLTVs were discovered mounted below the uppermost portion of the vehicle, inconsistent with Advisory Circular 150/5210-5, Painting, Lighting, and Marking of Vehicles used on an Airport. These concerns combined with the unique low-profile of the TLTV create a potential safety risk which is unacceptable at Part 139 airports.

Airport Operators should contact each TLTV operator and use the following items as a minimum checklist when addressing TLTVs in operation at certificated airports:

1. Verify TLTV vehicle operator drivers training is conducted and documented in accordance with the vehicle manufacturer and operators’ written policies and procedures.
2. Verify aircraft navigation lights and anti-collision lighting systems are activated during any TLTV tow operation within the AOA. (14 CFR, Part 91.209).
3. Verify the TLTV is adequately illuminated with lighting and reflective markings in accordance with Advisory Circular 150/5210-5, Painting, Lighting, and Marking of Vehicles. Specifically, ensure each vehicle is equipped with adequate onboard lighting on the uppermost portion of the vehicle to insure conspicuity in a 360-degree radius.
4. Coordinate with each TLTV operator and Air Traffic Control Tower management to insure ATC personnel are made aware of TLTV operational capabilities and limitations. (TLTVs are not capable of complying with an ATC instruction to “expedite”).

5. Develop either a Letter of Agreement or Memorandum of Understanding between each TLTV operator and the airport addressing the unique safety challenges identified in this CertAlert or any other safety considerations presented by the operation of TLTVs on an airport holding a Part 139 Operating Certificate.

Additional TLTV guidance will be forthcoming as a result of current research initiatives with the Airport Cooperative Research Program and FAA Technical Center. Based on the unique safety challenges presented by a TLTV, the FAA intends to seek policy changes, to amend the Airport Certification Manual to specifically address the safe operation of TLTVs.



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