

equipped with this additional power source. Large aircraft under tow by Super-Tugs may not be sufficiently illuminated and ATC has reported aircraft under tow (by a Super-tug) may not be recognized for its size, unrecognizable at all from certain angles and in some instances caused ATC to take quick actions to avoid a safety incident.

- F. Some Super-tugs may be too wide to safely operate on standard airport perimeter roads. In fact, it is reported that a common practice is to move the Super-tugs, without an aircraft in tow, across the airport movement areas for repositioning. This practice is inconsistent with the FAA's philosophy of keeping these areas clear of vehicular traffic. According to part 139.329(b) the airport operator is responsible to establish and implement procedures for the safe and orderly access to and operation in, movement areas and safety areas by pedestrians and ground vehicles, including.....by an employee, tenant, or contractor.

The investigation into this Runway Incursion and operations of Super-tugs on part 139 airports is of the highest safety concern to the FAA. The Aviation Safety Division is working on a Constructed Dynamic Observation Report (ConDOR) under the Air Transportation Oversight System (ATOS) to advise part 121 air carriers of the FAA's concerns regarding the safety operation of Super-tugs at busy air carrier airports.

The Airports Division highly recommends certificated airport operators meet with each part 121 air carrier, or contractor, utilizing Super-tugs, to insure a safety risk management approach is being implemented to address the potential safety concerns posed by the operation of Super-tugs at part 139 certificated airports.



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07/1/08
DATE

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