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.

<u>SUGGESTED ATPAC ACTION</u>: 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.

<u>RECOMMENDATION #1</u>: 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 advice 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 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 was AFS-100 The consensus was that Jeff and David Madison should discuss and resolve.

128 – Discussions centered on the particular equipage of the aircraft. Ben Grimes concurred and will coordinate with RNAV Office to accomplish without SMS.

129 – Don Frenya/Kerry Rose will determine the status of SRMD action and Joe McCarthy will address the issue with ATO-T for reports at 130.

130 – Joe McCarthy will work with ATO-T regarding the SRMD and DCP will check status of DCP.

131 – Agreed that further coordination be done between the RNAV and ATO-T offices to ensure no duplication of effort.

CURRENT STATUS: DEFERRED

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

IOU: **ATO-R**