

June 8th, 2012

Ms. Peggy Gilligan
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591

Dear Peggy,

During discussions at the PARC Face-to-Face meeting on May 2nd, 2012, it was determined that the FAA's lead time to implementation for changes to enable the new "Climb Via" phraseology is insufficient for industry to disseminate throughout their respective pilot communities. The FAA members indicated that the current plan is to implement the new phraseology in FAA Order 7110.65 and Airmen's Information Manual (AIM) on July 15, 2012. Representatives from industry reported it will take longer than the 30 days currently allotted for their training departments to ensure the new phraseology change has been properly disseminated to pilots. The PARC recommendation is that the FAA adjust the schedule so that the newly released phraseology becomes available to the flying public a minimum of 90 days prior to implementation.

In addition, to increase the time from availability to implementation, the PARC further recommends the FAA partner with industry to develop an implementation plan that will ensure pilots are fully aware of the "climb via" change. This specific change will have significant impact on how Area Navigation (RNAV) departure procedures will be used in the National Airspace System (NAS), therefore it is critical to successful implementation.

PARC appreciates your continued support of our activities. Please call me if you have any questions or would like to set up a discussion.

Sincerely,



Dave Nakamura
Chairman
Performance-based operations
Aviation Rulemaking Committee

Cc: Mark Steinbicker
Bruce DeCleene
Joe McCarthy