

# EFVS QUARTERLY

## December 2020

The EFVS policy team thought it would be beneficial to continue to focus on the Part 91 operator. Part 91 LOAs make up over 80% of our EFVS authorizations. In this newsletter we try to answer a few questions about LOAs and touch on training record endorsements.



## Common FAQs about the part 91 EFVS authorization ...

**How does a part 91 operator get EFVS operational credit?** There are two parts to this answer:

First, Part 91 operators do not need EFVS operational credit. EFVS operational credit provides relief to regulations in part 121, 125, and 135 commonly referred to as the “approach ban”. The approach ban prohibits those pilots from commencing approaches when visibility is reported lower than the minimums on the approach chart. Part 91 operating regulations do not include an approach ban. That means pilots can begin an instrument approach no matter what the reported visibility happens to be. This is often called a “look-see” approach and is unique to part 91 operations. Since there is no approach ban regulation in part 91, it is not necessary to include EFVS operational credit in the C048 LOA. Second, many part 91 operators chose to operate with a non-regulatory approach ban as an alternative to conducting look-see approaches. If you are one of those operators, the [Operational Suitability Report](#) for EFVS operational credit may be useful. It provides information on EFVS operational credit for part 121, 125, and 135 operators and therefore provides a record of demonstrated performance for each system.

### Why are EFVS Operations to Touchdown and Rollout limited to 1000 RVR in the LOA?

Since pilots are using a system to generate enhanced visibility in a critical phase of flight, it is important to consider what happens if the system fails. There is no minimum natural visibility requirement in the EFVS to touchdown and rollout regulation. However, Flight Standards sets minimum visibilities for these operations to mitigate for an unlikely system failure. This considers an EFVS failure after the touchdown point, and when a go around may not be the safest course of action. This is why the C048 LOA requires a minimum of 1000 RVR or 1/4 mile visibility when authorized to conduct EFVS operations to touchdown and rollout. This minimum visibility requirement in the LOA could be viewed as an approach ban for these operations.

### What EFVS Operations does C048 Authorize?

We created the C048 so that it could be issued to authorize either the EFVS operation to 100 feet above the TDZE or the EFVS operation to touchdown and rollout ... or both. Remember that Part 91 operators do not need the LOA to conduct EFVS Operations to 100 feet above the TDZE in the US but the LOA can be requested in order to facilitate operating overseas.

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## TRAINING ENDORSEMENTS

FAA approved training is a critical component for conducting safe EFVS operations. Obtaining the EFVS authorization (LOA C048) will require you to provide a properly endorsed training record. The endorsement must state the pilot satisfactorily completed training that meets the requirements of § 61.66 and covers the type of EFVS operation the pilot wants to conduct. It is important that your training is endorsed correctly .... so check your training record before you leave the training center.



### SAMPLE ENDORSEMENT

The pilot has satisfactorily completed the ground and flight training required by § 61.66(a) and (b) for EFVS operations and was found proficient in the use of EFVS in this category of aircraft for operations conducted under § 91.176(a).