



FAA

Aviation Safety

Memorandum

Date: April 15, 2020

To: Memorandum for Record
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From: Mark Steinbicker, Manager, Flight Technologies and Procedures Division

Subject: Operational Safety Review of Proposed Extension of Instrument Flight Procedure Periodic Inspection Requirement

Purpose:

The purpose of this Operational Safety Review (OSR) was to identify potential hazards and evaluate risks associated with a proposed temporary extension to instrument procedure periodic inspection requirements. The panel proposes a 180-day extension to the normal periodic inspection window and a 90-day window to restore compliance once COVID-19 travel restrictions lift.

Summary and Background:

A panel of Flight Standards and Flight Program Operations (AJF) subject matter experts (SMEs) conducted an OSR of a proposed extension to the periodic inspection requirement.

COVID-19 presents unique challenges to accomplishing periodic inspections on special instrument flight procedure Required Navigation Performance (RNP) procedures. For example, Non-FAA service providers¹ often use commercial travel to landing locations and some utilize operator aircraft to conduct inspections. The majority of the impacted procedures are vital helicopter air ambulance (HAA) instrument flight procedures.²

¹ FAA Order 8260.19 Flight Procedures and Airspace, defines service providers as any organization, company, or person who develops and/or maintains instrument flight procedures.

² National Airspace System has over 1200 helicopter air ambulance procedures. The majority maintained by non-FAA service providers.

FAA Order 8200.1, United States Standard Flight Inspection Manual, Table 4-1 Basic Schedule for Periodic Flight Inspection (ATCH), establishes the periodic flight inspection interval of 540 days (+/- 60-day window). In addition, guidance allows a 30-day extension.³

Discussion:

During the course of deliberations, the panel identified undiscovered man-made obstacles existing for a longer period of time as a potential new hazard.

Service providers protect procedure obstacle clearance surfaces by continuously monitoring notices of proposed construction⁴ through the FAA's Obstacle Evaluation/Airport Airspace Analysis (OE/AAA) program. The periodic inspection provides a visual verification of automated obstacle monitoring. Therefore, the potential hazard is the presence of undiscovered man-made obstacles penetrating the instrument flight procedure's obstacle clearance surface not present at the time of the last periodic inspection and not identified in OE/AAA.

The existing risk mitigation for man-made obstacles are described below:

- Obstacle monitoring (OE/AAA)
- Periodic inspection (extended)
- Operator issued guidance to report new construction that may adversely affect the procedure⁵

As additional risk mitigations to the proposed 180-day extension to instrument procedure periodic inspection requirements, the panel recommends the following:

- Notify affected operators, via AFS-420 memo sent to FAA Principal Operations Inspectors (POIs), of procedures impacted by periodic inspection extensions.
- Instruct affected operators to report new man-made obstacles near final and missed-approach segments of the procedure to the responsible non-FAA service provider.
- Operators, working with their POI, can apply informed risk based decision-making (RBDM).

Operators, working with their POI, should assess the risk of any special instrument procedure with an overdue periodic inspection. As a minimum, if the operator discovers any previously unidentified man-made obstacle, that could create a hazard, it must be reported without delay to both the service provider and the POI.

Rationale for not requiring further SRM analyses:

The panel believes after additional POI/operator awareness and RBDM no additional SRM analysis is needed.

³ The periodic flight inspection window for all SIAP(s) may be extended an additional thirty (30) calendar days provided the procedure is reviewed, no known environmental changes, and appropriate approval.

⁴ 14 CFR Part 77 Safe, Efficient Use, and Preservation of Navigable Airspace defines notice requirements.

⁵ FAA FORM 8260-7B Special Instrument Procedure Authorization, documents procedure specific operator requirements.

OSR Panel Members:

Name	Organization
Jim Rose	AFS-420
Don McGough	AJF-1700
James N. Crawford	AFS-410
Jeffrey D. Robinson	AFS-420
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Attachment:
Table 4-1