

November 1, 2006

Mr. Nicholas Sabatini
Associate Administrator for Regulation and Certification
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D.C. 20591

Dear Nick:

After receiving the FAA updates for Order 8260.42B on September 21, 2006, the PARC 8260.42B Action Team performed a cursory review and determined that the proposed response date of 4 November, 2006 cannot be achieved. The basis for this determination is that the content of the updated order modifies significantly the criteria contained in Order 8260.42A and FAA Point-in-Space (PinS) policy, and also incorporates numerous changes to the FY04 version of .42B. A major complication for the Action Team's review is that sections of criteria that were not changed in the FY04 version have now been changed; and some of those changes appear to have complexities and implementation subtleties that warrant a close examination. In addition, the FAA has also included WAAS LP criteria, which the industry has requested, but which has not previously been reviewed by industry.

PARC requests that its response due date be extended to February 1, 2007 to allow for a review that addresses previous and outstanding comments to the prior versions of the notice, provides the necessary time to review the new WAAS LP criteria, and allows coordination and resolution of issues within PARC and the vertical flight community. The Action Team has identified the tasks needing to be performed, along with the associated completion dates that reflect a number of major holidays that occur in the schedule. The planned tasks and task schedules are as attached.

Sincerely,



Dave Nakamura
Chairman
Performance-based operations Aviation
Rulemaking Committee

Cc: PARC Members
S. Hickok
B. DeCleene
J. McGraw
J. Williams

Attachment – 8260.42B Action Team Tasks

The .42B review effort has been organized into the following tasks. The bullet-boxes checked signify those tasks have been completed and unchecked indicates those groups identified or task have not completed that effort as of this date.

- The first task** involves reviewing public comments submitted to the Feb '04 version and FAA responses (e.g. 'Adopted' and 'Adopted in Part') to determine if FAA's responses have been included in the Sep '06 version.
 - HAI submitted 122 comments of which FAA AFS Adopted - 27, Adopted in Part - 16, and Not Adopted - 79. (HAI Review Complete)
 - American Helicopter Society (AHS) submitted - 3 comments of which FAA AFS rejected all 3. (AHS Review Complete)
 - Association of Air Medical Association (AAMS) submitted 5 comments of which FAA AFS Adopted all 5. (AAMS Review Not Complete)
 - USAASA (Army) submitted 8 comments of which FAA AFS Adopted - 7 and Adopted in Part - 1. (USAASA Review Not Complete)
 - FAA AVN submitted 79 comments. (AVN Review Not Complete)

- The second task** involves reviewing FAA Order 8260.42B provided to the action team in Sep '06 and determine if the original comments submitted during the FY '04 public comment process and 'Adopted in Part' or 'Not Adopted' by FAA AFS continue to impose a 'Moderate Concern' or 'Significant Concern', or if given FAA response, and changes in the Sep '06 version of 8260.42B, if it is 'Okay' to delete the comment from further consideration:
 - Of HAI's original public comments:
 - 94 comments are Okay (e.g. FAA response, explanation, and handling in the Sep '06 version 8260.42B resolved the comment)
 - 19 have Moderate Concerns Remaining
 - 10 have Significant Concerns Remaining
 - Of AHS original public comments:
 - 1 comment is Okay
 - 2 comments have Significant Concerns Remaining
 - Of AAMS original public comments: (AAMS Review Not Complete)
 - Of USAASA (Army) original comments: (USAASA Review Not Complete)
 - Of FAA AVN original comments. (AVN Review Not Complete)

- The third task** involves reviewing the new sections and new criteria introduced in the Sep '06 version of FAA Order 8260.42B.
 - Specific sections and topics were assigned to pertinent industry team members during the Oct 11, '06 telecom. (e.g. avionics systems and

aeronautical engineers, test pilots, users, etc. accepted specific assignments.)

- Each group and individual assigned a task provided an estimated time required to complete the task (2, 3, and 6 weeks were typical)
 - Certain questions need answers and coordination from FAA before the PARC VFWG can finalize its recommendations. FAA's VFWG coordinator provided an estimated 3 weeks will be necessary to coordinate answers after being provided the list of questions.
- The fourth task** involves combining the work product from the sub-groups and individuals into a concise and consolidated list of recommendations.
- The recommendations will be submitted to the full PARC for review and comments.
 - When approved by the PARC the recommendations will be submitted to FAA by the PARC Chairman
 - The VFWG 8260.42B Action Team will remain in-force to receive and review FAA responses to its list of recommendations.
 - The VFWG 8260.42B Action Team will review FAA responses and may need additional time for telecoms, F2F meetings, and to prepare supplemental recommendations based on FAA response.

Based upon the required expertise for these tasks, the tasks are sequential in order. Again, it needs to be noted that we have three major holidays within the schedule: Thanksgiving, Christmas, and New Year.

<u>Task</u>	<u>Target Completion Date</u>
Task One	November 13, 2006 ¹
Task Two	November 13, 2006 ¹
Task Three	December 4, 2006 ²
Task Four	January 31, 2007

The Action Team members working on this activity are as follows:

- Non-Fed IAP Developers (Criteria Users)
- AVN IAP Developers (Criteria Users)
- American Helicopter Society(AHS)
- USAASA (Army)
- Helicopter Association International (HAI)
- Association of Air Medical Services (AAMS)
- National EMS Pilots Association (NEMSPA)

¹ It is hoped that we can achieve delivery of Task One and Two together; both tasks deal with past comments.

² FAA has indicated it will require 3 weeks after delivery of any questions submitted by the Action Team for FAA to respond. It is hoped the Action Team will be able to provide its list of questions on Nov 13 to FAA, which provides FAA 3-weeks to respond by Dec 4.)

- Eastern Region Helicopter Council (ERHC)
- Sikorsky Aircraft Corporation
 - Experimental & Production Test Pilots
 - Aeronautical & System Engineers
- Eurocopter
 - Production Test Pilot
- Textron/Bell Helicopter
- Garmin: Avionics/Systems Engineers
- Special Advisors
 - FAA WAAS Office (Advisor)
 - Gulf Stream (Senior Experimental Helicopter Test Pilot)
- FAA AFS-420, -410, -800, -230, Helicopter Directorate