

May 20, 2013

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

Dear Margaret,

Peggy

The FAA plans to release revised Document Change Proposals related to new phraseology for “Climb Via”, “Descend Via” and speed adjustments in October 2013. These documents provide new guidance and phraseology to better handle Standard Instrument Departures (SID) and Standard Terminal Arrival (STAR) procedures with altitude and speed restrictions. The publication of these changes will have a significant impact on operations in the National Airspace System (NAS). Therefore, the PARC believes that the introduction of this new and modified phraseology into the NAS will require significant planning and coordination on the part of the FAA with domestic and foreign airline, business aviation and general aviation operators in order to assure a successful execution.

The PARC is making two recommendations for successful execution. First, the PARC recommends the FAA create and execute an implementation plan that includes the following:

- Work with the industry on an outreach strategy that will effectively disseminate the information to pilots and operators.
- Collaborate on training materials and informational bulletins for pilots and controllers that provide consistent and comprehensive products for distribution.
- Plan, stand up and activate an Implementation Team for Climb Via phraseology.
- Address Pre Departure Clearance (PDC) impacts, as a result of incorporating Climb Via on PDCs. (Note that differences exist between verbal and automated pre-departure clearances that continue to introduce confusion between pilots and controllers)

Time is of the essence in order to meet the intended implementation of October 2013 and it will be necessary to aggressively schedule work group meetings in the very near future in order to meet the impending deadline.

Second, the PARC recommends the FAA engage with the ICAO to develop international standard phraseology for SIDs and STARs with published restrictions. In the absence of an international standard, States have been left to develop their own, which has led to inconsistencies across the globe.

The PARC appreciates your continued support of our activities. Please call me if you have any questions.

Sincerely,



Dave Nakamura
Chairman
Performance-based Operations Aviation
Rulemaking Committee

Cc: Bruce DeCleene
Dennis Roberts
Mark Steinbicker