Captain Mark Bradley  
Chairman  
Performance Based Operations  
Aviation Rulemaking Committee (PARC)  
Delta Airlines  
1030 Delta Boulevard  
Atlanta, GA 30354-1989  

Dear Captain Bradley:

Thank you and the PARC for the recommendation to address flight management computer (FMC) issues that occur when the Standard Terminal Arrival (STAR) Bottom Altitude is lower than Instrument Approach Procedure (IAP) Initial Approach Fix (IAF) altitude(s).

We will develop draft criteria to encourage procedure designers to specify STAR bottom altitudes not lower than the desired connecting point of any IAP it serves and to establish approach IAF altitudes not higher than the bottom altitude of planned connecting STAR(s). Contingent upon completion of a successful Safety Risk Management Analysis, we will incorporate this material into a revision of Federal Aviation Administration Order 8260.3, United States Standard for Instrument Procedures.

If you have any questions, please contact Mark Steinbicker, Manager, Flight Technologies and Procedures Division at (202) 267-8790.

Sincerely,

Ali Bahrami  
Associate Administrator for Aviation Safety
ST AR Bottom Altitude vs IAF Altitude AVS Action Plan

**Recommendation:**
The PARC recommends that ST AR bottom altitude vs IAF altitude be addressed by:

1. Add note to STAR criteria that would encourage assurance that STAR bottom altitude is above IAF altitude.
2. Add note to IAP criteria that would encourage assurance that IAF altitude is below ST AR bottom altitude.

**Task 1: Update guidance in Order 8260.3E**

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<tr>
<th>Responsible Office(s)</th>
<th>Expected Completion Date</th>
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<tbody>
<tr>
<td>AFS-420</td>
<td>Tentative: January 1, 2020</td>
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Proposed: Update FAA Order 8260.3E adding guidance to STAR and IAP criteria sections encouraging assurance that STAR bottom altitude is above IAF altitude and IAF altitude is below STAR bottom altitude.

**Task 2: Work with AIS to evaluate need to update IFP automation.**

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<tr>
<td>AFS-420, AIS, AJV-14</td>
<td>Oct 2020</td>
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Proposed: Work with AIS to determine if there are required TARGETS changes. TARGETS may require an update to the Requirement Specifications and a coding update to amend the software to support this change. AIS/AJV-14 testing of the software and training may be necessary prior to fielding the software.