15 June 2020

Mr. Ali Bahrami  
Associate Administrator for Aviation Safety  
Federal Aviation Administration  
800 Independence  
Avenue, S.W. Washington,  
D.C. 20591

Dear Ali,

The Performance-based Operations Aviation Rulemaking Committee (PARC) Steering Group is pleased to submit the following recommendation for your consideration. The PARC Navigation Work Group (NAV WG) recently completed an analysis of design criteria for RNAV approaches that use an RF leg to join the final course. Currently the criteria requires a 2NM straight segment prior to the PFAF. These criteria should be aligned with the existing criteria for RNAV to xLS in FAA Order 8260.58A Appendix C. The recommendation, which follows this letter, serves to improve procedure design process efficiencies.

The PARC appreciates your continued support of our activities.

Sincerely,

Mark Bradley  
Chairman, PARC

Cc:   Mark Steinbicker  
      Chris Hope  
      Mike Cramer  
      Wade E.K. Terrell  
      Gary L. Powell
**Background**

The highlighted restriction placed into procedure design criteria for RNAV approaches using an RF leg to join the final approach course has the effect of causing aircraft to fly more track miles than the most efficient design would produce. This is a detriment to the ongoing push toward full PBN implementation.

**Recommendation**

The Nav WG recommends the following change to procedure design criteria:

1. The Nav WG recommends that the 8260.58A design criteria be changed to remove the requirement for the 2 NM straight segment between the end of an RF and the PFAF to match the findings for RNAV to xLS per Appendix C.