



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety  
Flight Standards Service

800 Independence Ave  
Washington, DC 20591

Captain Ronald Renk  
Co-Chairman, Performance-based Operations  
Aviation Rulemaking Committee (PARC)  
7401 E. Martin Luther King Boulevard  
Denver, CO 80207  
[ron.renk@united.com](mailto:ron.renk@united.com)

Dear Captain Renk:

Thank you and the Performance-based Operations Aviation Rulemaking Committee for your recommendation on Obstacle Accuracy Standards & Instrument Flight Procedure (IFP) Obstacle Evaluation.

The Flight Technologies and Procedures Division reviewed the recommendation in consultation with the Federal Aviation Administration's (FAA) Aeronautical Information Services, Office of Airports, and Aircraft Certification Service. Our analysis compared the current policy against the proposal to determine the level of effort and scope. We also coordinated with other stakeholders to assess the impact and implementation effect.

We recognize the value of defining a policy that reflects the most up-to-date survey technologies but do not feel the current approach is unsafe or unnecessarily conservative. Compared to the effect on the IFP service providers and the IFP current inventory, we do not think the benefit justifies the cost.

Currently, the FAA will not take action but will retain the recommendation for consideration as survey standards, obstacle databases, design software, and IFP inventory continue to evolve.

Sincerely,

Lawrence Fields  
Acting Executive Director, Flight Standards Service