

AERONAUTICAL CHARTING MEETING
Charting Group
Meeting 18-01 – April 25 - 26, 2018

RECOMMENDATION DOCUMENT

FAA Control # 18-01-322

Subject: Recognizing Specific PERM NOTAMs as Authoritative Source

Background/Discussion:

Airport managers are given considerable leeway in the NOTAMs they issue and the end date of that NOTAM. A PERM NOTAM is generated for conditions that are permanent and are not yet reflected on a chart. However, it is incumbent on the NOTAM issuer to also initiate an Aeronautical Data Change (ADC) request to have the chart be correspondingly updated. There are hundreds of examples of a PERM NOTAM being issued with no follow-on action for a chart change. The result is the chart is not updated and the NOTAM is the only indication of the change. The FAA is limited in how they can (a) unilaterally initiate a chart change request, (b) cancel a NOTAM, and (c) enforce NOTAM policy on airports.

As the number of NOTAMs in the US continues to increase, there are safety concerns with the volume of NOTAMs pilots and air traffic controllers must read. This issue is identified in ASRS and ATSAP reports. This issue is exacerbated by the fact that many NOTAMs do not transfer to a chart change in a timely manner. Pilot compliance and awareness will improve by indicating accurate information on the chart.

As a NOTAM requires pilot compliance and is being issued by an authoritative representative of that airport or facility, a PERM NOTAM should be considered an authoritative source in and of itself for initiating a chart change. Permitting this additional trigger for charting would allow the process to be further automated. The process would no longer solely rely on the additional manual action of the NOTAM originator.

The scope of what PERM NOTAMs are accepted as an authoritative source should be limited to ensure other FAA policies and procedures are being followed. For example, a NOTAM indicating a change to a traffic pattern direction (right vs left) would not be an appropriate source. This is because changes to traffic pattern direction require an airspace analysis by the FAA and there is a mechanism to update charts already built into that process.

According to Order 7930.2R, "when a NOTAM is originated to advertise a permanent condition that will be published in a publication, chart or database 'PERM' should be inserted as the expiration date in lieu of a 10-digit date-time group." However, there are many examples of a PERM NOTAM being issued with no follow-on action taken to request an update to the chart. Below are some examples of NOTAMs active as of March 26.

Issued in 2010: !ANB 10/020 7A6 RWY 5/23 THR DISPLACED 850FT 1310012016-PERM
2011: !TYS 11/057 TYS NAV ILS RWY 5L BENFI LOM OUT OF SERVICE 1311271516-PERM
2012: !LOU 12/208 1M9 RWY 2/20 CHANGED TO 4600FT X 75FT. 1312171914-PERM

For some airports, the FAA or State inspectors are the ones who submits the ADC. However, these visits can be infrequent, sometimes several years can pass between inspections for

General Aviation airports. In some cases, the Airport Manager chooses not to go through the ADC process as there is no enforcement. This leaves operators and controllers with little recourse.

Recommendations:

The National Flight Data Center should accept a PERM NOTAM as an approved authoritative source to initiate a chart change (i.e., for appropriate VFR and IFR charts, and/or Airport/Facility Directory) when no other chart change request or notice has been received. This action should be initiated 180-days following the effective date of the PERM NOTAM. The PERM NOTAMs authorized to initiate a chart change include:

- Runway length, width, slope, displaced threshold, declared distances, limitations
- Visual guidance lighting systems
- Engineered Material Arresting System
- Taxiway wingspan limitations
- Wildlife entries
- NAVAID out of service
- Traffic pattern altitude
- Airport attendance, customs hours
- Airport information like contact numbers

The FAA should update their guidance to reflect this change:

- JO 7900.2
- Order 7930.2
- Applicable airport Advisory Circulars
- Applicable National Flight Data Center publications

The FAA should designate a responsible office to cancel the PERM NOTAM once the change has been charted. This authority is provided for in Order 7930.2:

4-3-3. CANCELING PUBLISHED NOTAM DATA

a. When data appearing in a NOTAM is printed correctly in a publication or on a chart, cancel the NOTAM.

b. NOTAMs must remain current until the data is published in one or more of the following, with the exception of NAVAID NOTAMs, which must remain in effect until the NAVAID is returned to service or decommissioned:

1. Airport/Facility directory.
2. Enroute low altitude charts.
3. Enroute high altitude charts.
4. Terminal procedures publications.

NOTE-

FDC NOTAMs relating to instrument approach and obstacle departure procedures and airways must remain current until published in the Terminal Procedures Publication or applicable enroute chart.

5. Supplements (Alaska and Pacific).
6. VFR Charts:
 - (a) Sectional charts.
 - (b) World aeronautical charts.
 - (c) Terminal area charts.

Comments:

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Date: April 2, 2018

MEETING 18-01

Rune Duke, AOPA, summarized the issue. Rune stated that airport managers generate PERM NOTAMs (with a NOTAM end date of PERM) to communicate permanent changes to airport conditions and attributes, but do not submit these changes through the accepted Aeronautical Data Change (ADC) conduit that is used to publish those changes on the FAA charts and publications. This results in charts not being updated and contributes to the ever-increasing number of NOTAMs pilots and controllers are required to read. Rune proposes that the National Flight Data Center (NFDC) begin to accept certain PERM NOTAMs as authoritative source to initiate changes in the National Airspace Services Resources (NASR) database that will in consequence result in chart changes to airport information.

Valerie Watson, FAA/AJV-553, suggested two possible solutions. The first is to implement Rune's suggestion to have NFDC accept certain PERM NOTAMs as source. The second possibility is to create an improved process for reaching out to the airport managers to ensure that they are initiating the ADC requests. She stressed that airports are already required to do this.

Lynette Jamison, FAA/AJR-B11, provided some background on this problem. She said that Flight Service used to assist airports with generating PERM NOTAMs and with contacting NFDC to initiate the database and subsequent chart changes. When the FAA moved to the Federal NOTAM System (FNS), airport managers were left to do it on their own, and it is Lynette's belief that airports don't have sufficient training on the requirements of the new system. She said the NOTAM Task Force has been reaching out to airports armed with [Advisory Circular 150/5200-28](#) to try to get these data changes to NFDC initiated, but she said the airports have no incentive to initiate an ADC because they can simply use the PERM NOTAMs. Rune said this is why he hopes the FAA can begin to use these NOTAMs as source to initiate the chart changes.

Valerie then asked Scott Jerdan, FAA/AJV-533, if NFDC would be open to the possibility of accepting certain PERM NOTAMs as authoritative source to update NASR. Scott responded that he thinks the issue is very complex and there is a need to engage Tech Ops and the Office of Airports.

Ted Thompson, Jeppesen, stated that he supports the Recommendation. He cautioned however, that there are certain changes that must first be coordinated with flight procedures, e.g., runway length changes, lighting changes, NAVAID out of service, etc., and stressed that the specific types of PERM NOTAMs accepted as source will have to be looked at very carefully. He also mentioned that the publication of the changes on the charts must be coordinated with cancellation of the NOTAM.

Several others in the audience also voiced strong support for this recommendation, both as a way to keep the charts/publications current and to reduce the total number of NOTAMs that need to be assessed by users.

A lengthy discussion followed, regarding how to notify the airport authority of the requirement to follow up their PERM NOTAM with the initiation of a chart change to NFDC. Scott suggested the formation of a workgroup to discuss these issues further. Lynette volunteered to chair the workgroup, which will ideally include Tech Ops, the Office of Airports, the NOTAM Office, NFDC and NATCA.

PERM NOTAM Workgroup			
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STATUS: OPEN

ACTION: Lynette Jamison, FAA/AJR-B11, will report on progress of the PERM NOTAM Workgroup.

ACTION: Scott Jerdan, FAA/AJV-533, will investigate using PERM NOTAMs as authoritative source to revise NASR (including what specific NOTAM type changes are appropriate) and will contribute this information to the PERM NOTAM Workgroup.

MEETING 18-02

Lynette McSpadden, FAA/AJR-B3, reviewed the topic and provided [an update](#) on behalf of the PERM NOTAM Workgroup. Lynette said that Workgroup provided a list to the NOTAM Policy Office of items that they recommend be changed in the National Airspace System Resources (NASR) database, and therefore subsequently on FAA charts/pubs, based solely on a PERM NOTAM. The response was that only three items on the list could be updated because the others have NAS element dependencies associated with them, such as other NAVAIDs, airspace, procedures, etc. It was also determined that if even these items were to be updated via PERM NOTAM, NOTAM policy would need to be updated to allow the FAA to cancel those PERM NOTAMS after publication. In order to determine if the FAA can cancel PERM NOTAMS on behalf of an airport, a safety analysis will need to be conducted. Lynette said that the earliest time that could take place is after the release of the S version of the NOTAM Order 7930.2 in February 2019.

Lynette discussed a couple of possible modifications to NOTAM Manager that could help ease the problem. One suggestion is to add an education piece to the training program so that airport proponents initiating NOTAMs understand it is their responsibility to ensure these changes are also submitted to the FAA for permanent publication via the NFDC Portal. Another suggestion is

to create a pop-up reminder in NOTAM Manager whenever PERM is used as an end date, directing the proponent to the NFDC Portal for input of the data into that conduit so that it is charted.

Lynette said that the NOTAM Task Force reviewed all of the PERM NOTAMs from January 2018 and found that of approximately half of them, the information had already been revised on FAA charts, but the airport did not take the necessary step to cancel the NOTAM. She announced that the NOTAM Task Force will not continue to review all PERM NOTAMS on a regular basis.

Rune Duke, AOPA, emphasized the need for the FAA to continue to pursue this issue. Lynette agreed and said that there needs to be more management of the NOTAM system. She said that the first step will be to conduct the safety analysis to determine if the FAA can have the authority to cancel NOTAMS with a PERM end date.

The discussion then shifted to the reasons why airports don't comply with NOTAM cancellation guidance and ways they could be forced or encouraged to comply. The possibility of losing Airport Improvement Plan (AIP) funding if an airport does not comply was suggested. Lynette said that AIP airports are not the problem, but mostly the smaller general aviation airports that don't receive FAA funding.

Rune commented on an effort made by AOPA to engage airports. A letter was sent out by AOPA to the airports identified with an existing PERM NOTAM in the system to try to encourage them to submit the necessary information to the FAA and then cancel the NOTAM. The found that some airports took action, but unfortunately many others did not.

Lynette repeated that in her view, the next step is for a safety analysis to be conducted in order to determine if the FAA can cancel PERM NOTAMs on behalf of an airport. Lynette anticipates the safety analysis work to start in CY2019 and she will provide an update at the next ACM.

STATUS: OPEN

ACTION: Lynette McSpadden, FAA/AJR-B3, will report on progress of a safety analysis to determine if the FAA can cancel PERM NOTAMs on behalf of an airport.

MEETING 19-01

Lynette McSpadden, FAA/AJR-B3, reviewed the topic and [provided an update](#). Lynette stated that she had reviewed the issue of who has authority to cancel NOTAMs and determined that FAA Flight Service has had the authority to cancel NOTAMs since 1977. She then briefed the numbers and types of PERM NOTAMs that are currently active in the system ([See Slide #7](#)). She said her office is continuing to reach out to those airports that have outstanding PERM NOTAMs to encourage them to cancel them.

Lynette then stated that once a NOTAM is published in the Chart Bulletin section of the Chart Supplement, the NOTAM can be cancelled. She suggested that perhaps the scope of the Chart Bulletin could be expanded to contain publication of some of this PERM NOTAM information. Valerie Watson, FAA/AJV-A250, explained that the Chart Bulletins are only used to update certain critical between-cycle changes to VFR Charts. Rune Duke, AOPA, pointed out that most

PERM NOTAMs do not affect published data on VFR Charts, but revise information primarily published in the Airport Facility Directory portion of the Chart Supplement.

Lynette stated that as she has confirmed that the FAA has the ability to cancel NOTAMs, the next step is to identify what types of PERM NOTAMs could be accepted by AJV-A as source to initiate a NASR revision and subsequent chart change. She provided a list of the types of data changes recommended for the initiation of a chart change ([See Slide #4](#)). She said she is also continuing to look into which FAA offices, in addition to Flight Services, could have or could be granted the authority to cancel NOTAMs.

STATUS: OPEN

ACTION: Lynette McSpadden, FAA/AJR-B3, will continue to investigate how the FAA can cancel PERM NOTAMs on behalf of an airport and who within the FAA has the authority to do so.

ACTION: Lynette McSpadden, FAA/AJR-B3, and Scott Jerdan, FAA/AJV-A310, will report on progress of identifying types PERM NOTAMs that can be accepted as source to initiate a NASR/chart change.

MEETING 19-02

Scott Jerdan, FAA/AJV-A310, reviewed the issue. He commented that he had been working with Lynette McSpadden on this issue, but she has since taken a new position within the Agency and is no longer with the NOTAM Office. He said that this effort has been rolled into the broader NOTAM Modernization effort and seems to have been put on the backburner since Lynette left. He said he will reach out to the NOTAM Office to try to reinvigorate this effort.

Scott said the first step is to determine if the FAA can cancel PERM NOTAMs on behalf of an airport and who within the FAA has the authority to do so. He said the NOTAM Office is still looking into this and emphasized that this recommendation cannot move forward until that action is resolved. He said that if it is determined that the FAA has the authority to cancel NOTAMs, resolution of what airport-specific NOTAM types could be accepted as source to initiate a National Airspace System Resource (NASR) revision and subsequent chart change will be established.

Rune Duke, AOPA, stated that there is a new initiative underway regarding the cancellation of PERM NOTAMs. He suggested that Scott work with Jerry Torres, FAA/AJR-B3, on the effort.

STATUS: OPEN

ACTION: Scott Jerdan, FAA/AJV-A310, will work with Jerry Torres, FAA/AJR-B3, to continue to investigate how the FAA can cancel PERM NOTAMs on behalf of an airport and who within the FAA has the authority to do so.

ACTION: Scott Jerdan, FAA/AJV-A310, will report on progress of identifying types of PERM NOTAMs that can be accepted as source to initiate a NASR/chart changes.

MEETING 20-02

Samer Massarueh, FAA/AJV-A221, reviewed the issue. Scott Jerdan, FAA/AJV-A310, said that the FAA NOTAM Modernization effort includes work involving PERM NOTAMs that remain active for extended periods of time and is investigating ways to remedy the issue. He said AJV-A is working with the Office of Airports to address PERM NOTAMs that are associated with airport information. He said his office is still not authorized to use PERM NOTAMs as source, so the Office of Airports is working with the Airport District Offices and airport managers to encourage them to submit airport information changes to the FAA's Aeronautical Information Portal so the NOTAMs can be cancelled.

Valerie Watson, FAA/AJV-A250, asked if Scott is still working to determine the types of PERM NOTAMs that can be accepted as source to initiate a chart change and whether or not the FAA can cancel PERM NOTAMs on behalf of an airport. Scott said that could still be possible in the future, but for now, the goal is to encourage airports to submit the changes through the Portal and then cancel the NOTAM. Lynette Jamison, FAA/AOV-110, stated that the request to change the policy to authorize AJV-A to cancel PERM NOTAMs was denied. Scott said that the new collaboration with the Office of Airports and Tech Ops has resulted in a lot of progress and he is in support of continuing that effort.

Randy Collier, Aerologic, said he is involved with the training of airport inspectors and he would like more information that he can share when reaching out to airports to help with this effort. Scott suggested airport inspectors pull up all the PERM NOTAMs for an airport to make sure they are either still valid and/or if they need to be sent to the Portal for a permanent chart/publication change.

STATUS: OPEN

ACTION: Scott Jerdan, FAA/AJV-A310, will continue to work with the Office of Airports to establish a process for the reduction of PERM NOTAMs associated with airport information.

MEETING 21-01

Samer Massarueh, FAA/AJV-A223, reviewed the issue. Scott Jerdan, FAA/AJV-A310, recommended this item be closed. He said Aeronautical Information Services will not be authorized to use the discussed PERM NOTAMs as source to update the National Airspace System Resources (NASR) database and thus the charts/publications. He said they have been working with the Office of Airports and Tech Ops and have made progress communicating with the Airport District Offices and airport managers regarding when and how to submit permanent aeronautical changes to the FAA. He said he will continue that effort. Scott asked if AOPA agreed with closing this item.

Jim McClay, AOPA, stated his organization is in agreement and voiced the work currently being done supports the original goal of reducing the number of PERM NOTAMs in the system.

Valerie Watson, FAA/AJV-A250, asked the audience if there were objections to closing this item. There were no objections to closing. She reiterated that Aeronautical Information Services will continue to work with the Office of Airports on reducing the number of PERM NOTAMs associated with airport information.

STATUS: CLOSED