

AERONAUTICAL CHARTING MEETING
Charting Group
Meeting – April 27 - 29, 2021

RECOMMENDATION DOCUMENT

FAA Control #21-01-351

Subject: Non Air Carrier Runways @ Part 139 Airports

Background/Discussion:

On July 29, 2014, Southwest Airlines (SWA) Flight 11 departed from Chicago Midway International Airport (MDW) Runway (RWY) 31 Right (31R) while RWYs 4R/22L and 13C/31C were closed for scheduled construction. RWY 31R is a non-Part 139 runway, meaning it is not available for air carrier operations such as SWA Flight 11. Although the flight made an uneventful takeoff on RWY 31R, becoming airborne after a ground roll of about 3,500 feet on the 5,141-foot runway. Stakeholders agreed that a hazard exists whereby it is possible for air carriers to depart from or land on non-Part 139 runways. Further, they concluded it is likely that this hazard is not limited to MDW or SWA since Part 139 airports across the National Airspace System (NAS) have runways that are not part of their Part 139 certificate program and could be utilized by air carriers in error. A Safety Risk Management (SRM) Team of representatives from the Office of Airports (ARP), the Office of Aviation Safety (AVS), the Air Traffic Organization (ATO), the Flight Standards Service (AFS), and the National Air Traffic Controllers Association (NATCA) met on July – September 2016 with follow-up meetings in August and September, to perform a hazard analysis of the impact of air carriers using non-Part 139 runways at Part 139 airports. The (3) below recommendations are 3 of 9 recommendations identified that remain outstanding.

Recommendations:

1. Develop requirement for Part 139 airports with non-Part 139 runways to report standardized remarks identifying the non-Part 139 runway(s) in FAA Form 5010.
2. Establish new field in runway data section to identify if the runway is not available for air carrier use.
3. Update AC 150/5200-35, submitting the Airport Master Record in Order based upon requirements above.

Comments:

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MEETING 21-01

Alberto Rodriguez, FAA/AAS-300, briefed the new recommendation. He explained that in 2014 an air carrier departed from Chicago Midway International Airport on a non-Part 139 runway because the Part 139 runways were closed for construction. The flight made an uneventful takeoff; however, stakeholders agreed that a hazard exists where it is possible for air carriers to unknowingly depart from or land on non-Part 139 runways. It was also agreed that this hazard exists at Part 139 airports across the National Airspace System (NAS) that have runways that are *not* part of their Part 139 certificate programs and could be used in error. Based on the results of a Safety Risk Management (SRM) panel, the Office of Airports is recommending that non-air carrier runways be identified in the National Airspace System Resource (NASR) subscriber files and in the Chart Supplement to alert pilots to non-air carrier runways. Chris Criswell, FAA/AAS-120, said the Office of Airports is establishing the workflows and processes to collect this data. Now they are looking for the best way to provide that information to the pilots.

Valerie Watson, FAA/AJV-A250, showed an [example](#) of how this information is currently handled as a remark in NASR and in the Chart Supplement airport entries. Alberto agreed such remarks have historically been used, but the SRM panel ultimately decided it would be better for the information to be standardized, perhaps adding a new data field for airports to identify non-air carrier runways on the 5010 form and subsequently in NASR. The goal is to be able to tie the specific non Part 139 designation to a specific runway by use of a runway attribute rather than a lengthy text remark that a pilot may miss.

Rich Boll, NBAA, noted that the NASR remarks in Valerie's example appear on Jeppesen approach charts. He voiced he has seen many such notes that don't make sense and could benefit from review and standardization. He is concerned that most pilots won't know what "Part 139 runway" means and suggested perhaps better drafted and standardized remarks might be preferable.

Gary McMullin, Southwest Airlines, said that Southwest would like to see the data that makes these non-air carrier runways unsafe. He also agreed that pilots would not understand "Part 139 runway" terminology. He said that Southwest would like to participate in further discussion before this moves forward.

Bill de Groh, APA, asked if there is a rule that prohibits operation on a Part 139 runway, and if not, air carriers should be allowed to do their own risk analysis. Chris reiterated that they are simply trying to collect and disseminate a data attribute to identify runways that do not meet Part 139 requirements and that they not trying to change airport operations.

Many industry audience members voiced their concerns about Part 139 requirements and also concerns that adding this remark may cause pilot confusion. There was also discussion about

the need for greater granularity in the data that will be provided. Several in the audience expressed the need for further discussion before this effort moves forward.

Valerie summarized the discussion and pointed out that there are existing requirements for what defines Part 139 airports and the Office of Airports is not proposing to change that. Their goal is to simply identify those runways that don't meet the requirements. If pilots have issues with those requirements, that is a different discussion. Valerie asked if the remarks that are currently published will be removed once the new data attribute is published. Alberto said yes, their intent is to remove the remarks.

Valerie asked the proponents if they are open to forming a workgroup for further discussion. Chris and Alberto agreed and said the Office of Airports would chair the workgroup.

Non-Air Carrier Runways Workgroup		
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STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-300, and Chris Criswell, FAA/AAS-120, will report on the progress of the Non-Air Carrier Runways Workgroup.

MEETING 21-02

Samer Massarueh, FAA/AJV-A223, reviewed the issue. Chris Criswell, FAA/AAS-120, reported that the proposed changes to FAA Form 5010, Airport Master Record identifying whether a runway is available for air carrier use have been agreed upon and it was determined that there is no negative effect on end users to the addition of this runway attribute. The FAA Office of Airports will continue working toward the addition of this data element. He said additional discussions are needed with AJV-A to discuss publication in the Chart Supplement. He also said the working group will continue to meet.

Michael Stromberg, UPS-IPA, pointed out that he doesn't know of any air carriers that use the Chart Supplement. Chris said he understands that issue and explained that this is simply a data element attached to runways that don't meet Part 139 runway requirements and that this information is really for data providers, not for end users. He said the Office of Airports is at the ACM to let people know this data is being collected and to ask what FAA product(s) it would best be published in.

Valerie asked whether this attribute is intended to replace the information that is now carried as a remark in the Chart Supplement. Chris said he does not think the remarks will be removed, but that is still part of the discussion. Valerie said, per pilot input at the last meeting, it would be helpful if the information in the remarks is still available.

Joshua Fenwick, Garmin, asked if there would be a new National Airspace System Resource (NASR) field created for this attribute. Scott Jerdan, FAA/AJV-A310, said he will participate in the workgroup so he can assist with the development of the data requirements.

Jim Deuvall, CAVU Companies, said he is on the working group and they had discussed adding a yes/no flag for each runway. He also said the discussion went beyond flight planning issues to concerns that aircraft would land on runways they weren't approved for. He also said the group is working on the possibility of adding an indication on Airport Diagrams. He shared there was discussion on the workgroup to remove the textual remarks once the new data field is added.

Brian Murphy, FAA/AJV-A350; Scott Jerdan, FAA/AJV-A310; Jon Gdowik, FAA/AJV-A313; Michael Stromberg, UPS-IPA; and Josh Fenwick, Garmin, would all like to be added to the workgroup.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-300, and Chris Criswell, FAA/AAS-120, will report on the progress of the Non-Air Carrier Runways Working Group.

MEETING 22-01

Alberto Rodriguez, FAA/AAS-320, [briefed](#) the audience on the background of this issue and on the ongoing work of the Non-Air Carrier Runways working group. The Office of Airports is developing a requirement for Part 139 airports with non-Part 139 runways to report standardized remarks to identify the non-Part 139 runway(s) in the Airport Data and Information Collection Portal (ADIP), which will be reflected on 5010 forms. It is also recommended they be identified in the National Airspace System Resource (NASR) database and in the Chart Supplement airport entries.

Alberto explained that the FAA plans to use the 5010 to clarify the information. In the 5010 example on [slide 4](#), the location highlighted in green is where they intend to add an "Air Carrier Runway" field that will identify whether each runway is available for air carrier use. The information highlighted in red shows the current state of remarks identifying runways that are not available for air carrier use. They plan to remove these lengthy remarks once the new field is in use. [Slide 5](#) shows the new air carrier yes/no field that will be added to ADIP. [Slide 7](#) shows where the new "non-Air Carrier" remark is proposed to be added in the Chart Supplement airport entry. Alberto said the workgroup also discussed adding the information to airport

diagrams. [Slide 9](#) shows an airport diagram with the proposed note to indicate runways that are not for air carrier use. He said an indication on the approach plates was also discussed but this was not supported by the workgroup.

Valerie Watson, FAA/AJV-A250, said if only runways that are not for air carrier use are identified, one could assume that every other runway in the National Airspace System (NAS) is for air carrier use. Alberto said this entry would only be used at certificated airports. Valerie said a pilot looking at the airport diagram doesn't know if it is a certificated airport or not.

Dan Wacker, FAA/AFS-420, asked if there is an official FAA definition of what an air carrier is. Alberto said he doesn't know what is in the Aeronautical Information Manual (AIM), but it is defined in 14 CFR Part 121 and 14 CFR Part 139. Dan asked whether large airplanes that are not "air carriers" can still use those runways. Alberto said the regulations apply to those certified as a Part 121 operators.

Mark Mentovai, Manhattan Flight Club, asked what the data in the airport entry of the Chart Supplement looks like when all the runways at an airport are not for air carrier use. Alberto said there would be nothing listed for non-certificated airports. Valerie asked how you know whether it is a certificated airport looking at the airport entry. Alberto pointed out that information is presently only shown in the airport remarks. Mark said if the plan is to annotate the runways in a structured fashion, they should also pull the "Class I" information out of the remarks in order to show the certificated status of an airport. Alberto said Part 121 operators are not looking in the Chart Supplement for the certificated status of an airport. That is information they already have. Mark said his concern is for those operators using the Chart Supplement as their primary source.

With regard to the note on the airport diagrams, Mark said he thinks the note should be a graphical indication so as not to clutter the chart with additional notes. Alberto said the working group looked into using a symbol but they decided against that because of the education piece that would be necessary when introducing a new symbol. The note provides the information succinctly and directly. Mark pointed out that general aviation pilots won't understand what "Not for Air Carrier Use" means. He thinks a large education campaign will be needed either way.

Mike Stromberg, UPS/IPA, said his concern is that airlines don't use the Chart Supplement and by putting the information there, it won't reach the pilots who need it. He said it is also only a very small audience that would use it on the airport diagram. He thinks they should be targeting the providers of the performance information. Alberto said this information will be available in NASR subscriber files and 3rd party providers can package and distribute it as they see fit.

Rich Boll, NBAA, said NBAA will not concur with the proposed note "Not for Air Carrier Use" on the airport diagram. He said as it is written, it denies access to those runways to every Part 125 and 135 operator in the NAS. He thinks the note should specifically state "CFR 14 Part 121 Air Carrier Use". Alberto said they are still working to refine the language of the note. John Barry, FAA/AIR-622, suggested that the new airport diagram note should be included with the weight bearing information. John also agreed with Rich's comment that the note as it is written now will exclude too many airplanes.

Rich suggested a field at the top of the airport entry in the Chart Supplement be added to designate an airport as Part 139. Valerie said she agrees with that suggestion. She asked if a field to designate Part 139 airports exists in NASR. Brian Murphy, FAA/AJV-A350, said "ARFF Index" is a field that is present in NASR and in the subscriber files. Scott Jerdan, FAA/AJV-

A310, said ARFF Index is already indicated at the top of the airport entry, which is defined in the Chart Supplement legend as indicating that it is a certificated airport (14 CFR Part 139). Colleen Kubont, FAA/AJV-A350, said in the NASR database there are three fields, one for the Part 139 type code, one for the Part 139 carrier certification code, and one for the ARFF certificate type date. Those attributes are put together for publication in the Chart Supplement. Valerie asked if this was not too complicated and perhaps there should be a simpler way to identify whether it is a Part 139 airport. If so, could that simpler designation be placed in the header of the airport entry?

Colleen said there is currently an open ticket for a NASR enhancement for adding a runway parameter for Part 139 airports called "Air Carrier Runway" that can be set to Yes or No. Valerie said if the note on the diagram is to be changed to "CFR 14 Part 121 Air Carrier Use", the database and Chart Supplement should be consistent with that. Colleen said this is different from the current requirement so they would need to revisit the NASR ticket. Valerie said the working group will first need to finalize the language that will be used and then bring that back to the group.

Jay Leitner, American Airlines, said he is fine with adding "Part 139" to the header of the airport entries, but he requests that the Class and ARFF Index entries remain.

Valerie summarized the discussion. She said there was general ACM support for adding some form of the Part 139 note to the airport diagram and to Chart Supplement runway entries, however the language on of the note still requires further investigation. There was also support expressed for adding a Part 139 indication to the heading of the airport entries in the Chart Supplement. The working group will continue to investigate these items.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of both Part 139 airports and runways.

MEETING 22-02

Alberto Rodriguez, FAA/AAS-320, reported that he was hoping to have the final recommendation ready for this meeting, however they have identified some additional items that need further work. He said the workgroup has been working to identify the products in which users would most benefit from this information being published. They plan to put it in the Chart Supplement and on the Airport Diagram, but have determined they needed to work on terminology that properly captures the concept and translates it to foreign operators as well. Alberto plans to present the final recommendation at the next meeting.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of both Part 139 airports and runways.

MEETING 23-01

This topic was not discussed during ACM 23-01. It will be briefed at the next ACM.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of both Part 139 airports and runways.

MEETING 23-02

Alberto Rodriguez, FAA/AAS-320, [presented](#) on this issue. He explained that the Office of Airports is developing a requirement for Part 139 airports with non-Part 139 runways to report standardized remarks to identify the non-Part 139 runway(s) in the Airport Data and Information Collection Portal (ADIP). It is also recommended they be identified in the National Airspace System Resource (NASR) database and in the Chart Supplement airport entries. He said, as an interim fix, the Office of Airports is working on developing a requirement for airports certificated under Part 139 to identify runways which are not available for air carrier use via standardized “Remarks” in the FAA Form 5010 Airport Master Record (AMR). See the proposed standardized remark on [slide 3](#).

The long-term solution is to establish a new field in the AMR – Runway Data section to identify which runways are not for use by Part 121 air carrier operations ([slide 4](#)). Then the relevant publications, e.g., Chart Supplement, Airport Diagram, can be updated and the remarks can be removed.

The blue arrow on [slide 5](#) shows where the data element is proposed to reside in the AMR. The red box shows an existing remark, which would be removed. [Slides 7-8](#) show an example of how the proposed language might be shown in the Chart Supplement Airport/Facility Directory entry and shows the existing remark that will be removed. The information would be shown under each runway.

Alberto said after receiving feedback at prior ACMs, workgroup discussions, and input from Flight Standards, the recommended terminology for the remark is “Not for Part 121 Air Carrier Use or Foreign Air Carrier Equivalent.” The workgroup also evaluated different types of aeronautical publications and determined the airport diagram to be the most functional publication for the information. [Slides 12-13](#) show the proposed language on the Airport Diagram.

He said the workgroup recommends adding a definition of Part 121 Air Carrier Runways to the Aeronautical Information Manual (AIM) and Aeronautical Information Publication (AIP). [Slide 15](#) shows next steps, including verifying the inventory list of affected certificated airports and associated runways, updating the FAA Form 5010 (AMR) and providing the data needed to populate the Chart Supplement, and providing notification to users (via InFO, Cert Alert, etc.) about when and where the information will be published.

Jon Gdowik, FAA/AJV-A313, said that remarks from ADIP are fed to National Airspace System Resource (NASR) and from there are picked up by the Chart Supplement. However, the plan to add those entries to each individual runway will require a NASR enhancement, which will take time. As a workaround, he thinks these changes can be made in phases by keeping the existing remarks, which will allow the FAA to meet the obligation until NASR enhancements can be made. In the future, we can remove the remarks and input the data in the runway fields. Alberto doesn't have an issue with this but thinks we need to continue to move forward with building the field into ADIP. Chris Criswell, FAA/AAS-120, said he can assist with the establishment of the data flow. Jon asked whether the current remarks published in the Chart Supplement will be standardized. Alberto said the existing remarks should already be standardized.

Jeff Lamphier, FAA/AJV-A240, said AJV-A and Office of Airports will need to have more internal communication before the Chart Supplement team commits to any action items. In the meantime, they will provide feedback on the recommendations briefed by Alberto.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of Part 139 runways.

ACTION: Chris Criswell, AAS-120, and John Gdowik, FAA/AJV-A313 will work together on the establishment of the data requirements for Part 139 runways.

MEETING 24-01

Alberto Rodriguez, FAA/AAS-002 [briefed](#) on this issue. He said the Office of Airports is working to establish a new field in the Airport Master Record (AMR) Runway Data section to identify runways at certificated airports that are not available for air carrier use. This data will be captured in the Airport Data and Information Collection Portal (ADIP) shown on [slide 3](#). The ACM workgroup recommendations are to add the remark to the relevant Chart Supplement entries and Airport Diagrams, update the language of the remark to "Not for Part 121 Air-Carrier Use of Foreign Air Carrier Equivalent", and remove existing published remarks. See examples on [slide 6](#) and [slide 7](#). Alberto explained that the work is progressing, and they will be sending out more information when it becomes available.

Dan Wacker, FAA/AFS-420, asked if part 91 aircraft that are not qualified as air carriers can still use these runways. Alberto replied that every operator has their operating certificates. The requirement to use a runway is based on the certificates and many variables go into what makes a runway unusable to part 121. Dan asked if once this project is complete, air traffic control be unable to assign an air carrier to those runways. Alberto stated that it is not an air traffic decision. The pilot makes that decision. That is why this work is being done to make the information accessible to pilots.

Rich Boll, NBAA, asked if Jeppesen and Lido plan to add the same standardized note to their airport diagrams. Aaron Jacobson, Boeing/Jeppesen, replied that they plan to do so.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of Part 139 runways.

MEETING 24-02

Jennifer Hendi, FAA/AJV-A250, reported that there have been ongoing meetings with the Airport Mapping Team and the Office of Airports on this topic. The final details of this recommendation are still being worked internally. She said to expect a more thorough report at the next ACM.

STATUS: OPEN

ACTION: Alberto Rodriguez, FAA/AAS-320, will report on the progress of the Non-Air Carrier Runways Working Group as it continues to investigate the data and publication requirements for the identification of Part 139 runways.