Federal Aviation Administration

National Part 139 Cert Alert

AdvisoryCautionary**Non-Directive**Advisory**Cautionary**Non-Directive**Advisory**Cautionary**Non-Directive**

Date: **12/11/2025** **No. 25-03**

To: All Title 14 CFR Part 139 Airport Certificate Holders

Subject: Enhancing Runway Safety Area (RSA) Safety: Risk Mitigation and Compliance Strategies – CertAlert 16-07: Canceled

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Purpose: Strategies and Compliance Methods Necessary for Safely Managing and Protecting the RSA. The RSA will normally be clear of people and equipment during aircraft landing and departure operations. Should situations require personnel and equipment to have limited and controlled access to the Runway Safety Area (RSA), procedures must be documented in the Airport Certification Manual (ACM) through an executed Letter of Agreement (LOA), outlining the operation requiring RSA access. Access to the RSA during aircraft operations is the exception to normal procedures and should only be used if required after ensuring proper controls have been established and are being managed by the airport operator.

Allowing personnel and equipment to access an RSA during aircraft operations introduces varying levels of risk. These risks include potential collisions, exposure to jet blast and prop wash, distractions leading to communication errors, and runway incursions[1]. The risks associated with RSA activity vary depending on airport characteristics, type of aircraft operations, frequency of aircraft operations, and the type of operation performed by personnel and equipment working in the RSA. By understanding and mitigating these risks, airport operators reduce incidents that could compromise the safety of both aircraft operations and ground personnel.

Establishing an RSA LOA does not delegate the airport operator's responsibility for protecting the RSA, rather it becomes an extension of the methods of compliance (procedures/protocols) adopted within the Airport Certification Manual (ACM). Effective methods of compliance for protecting the RSA and the activity within the RSA incorporate risk mitigation strategies, which are crucial for maintaining safety and compliance within the airport environment.

Investigations into RSA surface incidents involving personnel and equipment often find procedural issues at the core. These issues usually arise from missing, insufficient, inaccurate, or non-compliant procedures and protocols. Problems include unclear or outdated procedures and failure to follow

[1] Authorization from air traffic control to operate within a Runway Safety Area (RSA) permits personnel and equipment to be in the RSA up to the edge of the runway. An additional clearance is necessary for operations on any active, inactive, or closed runway (paved surface), except when operations on closed runways are conducted in accordance with a Letter of Agreement (LOA).

existing ones. Event reviews have identified gaps in RSA access that were not addressed by airport operators, introducing RSA hazards. These include failing to do the following:

- Ensuring that RSA access was necessary during aircraft operations when other runways or operational closures were available.
- Appropriately restricting construction activity within the existing RSA during aircraft operations.
- Conducting tenant and contractor coordination with the airport operator prior to and upon completion of RSA activities.
- Protecting the approach/departure portions of the RSA.
- Providing wingtip clearance protection for personnel and equipment up to the edge of the runway surface.
- Ensuring aircraft blast protections for personnel and equipment up to the edge of the runway surface.
- Scheduling RSA access during routine runway closures.
- Issuing Notice to Airmen (NOTAM) per § 139.339, Airport Condition Reporting.
- Conducting RSA inspections in accordance with § 139.327.

Airport Operator Responsibility for the RSA. The airport operator at a 14 CFR Part 139 facility is responsible for protecting the RSA, limiting safety area access, establishing safe and orderly access to and within the RSA, and disseminating airport information when activity occurs within the RSA (§139.309, 139.329, 139.339). The airport operator must remain aware of activity within the RSA and not delegate this responsibility to air traffic control, FAA Technical Operations, or any other tenant.

Best practice approach(es) to protecting the RSA include:

1. A runway closure (first consideration).

2. Establishing methods of compliance (considered an ***exception*** to normal procedures) within the ACM. The methods for protecting the RSA and the activity within the RSA should integrate risk mitigation strategies based on the airport's analysis and assessment of potential risks accounting for:

    - Activity coordination.
    - Airport characteristics.
    - Type and frequency of aircraft operations.
    - Activity performed by personnel and equipment within the RSA.
    - Weather.
    - Other conditions.

RSA Operations. Advisory Circular (AC) 150/5210-20 (current), *Ground Vehicle Operations to include Taxiing or Towing an Aircraft on Airports*, paragraph 3.1.4, and AC 150/5370-2 (current), *Operational Safety on Airports During Construction*, paragraph 2.22.1, discuss runway safety areas and considerations of airport operators. Additional considerations include:

1. Ensuring, if circumstances require (***exception to normal procedures***) personnel and

equipment to be in the RSA without a runway closure:

- A dedicated RSA LOA is established at airports with air traffic control and placed in the ACM.
- The activity is for a limited amount of time.
- Procedures mitigating risk have been implemented.
- Personnel and equipment remain outside the RSA, to the extent practical.
- All parties accessing the RSA are trained and follow established procedures.
- The airport operator remains aware of RSA access and approves all activity.

2. Ensuring, in compliance with §139.329, that airports without air traffic control, or during times when air traffic control is not operating, adequate procedures to control pedestrians and ground vehicles in safety areas are established. These procedures are documented in the ACM, including procedures to ensure the RSA is clear during normal aircraft operations.

RSA LOAs. Airport operators should be aware of instructions, standards, and guidance for operating and managing air traffic facilities implemented and utilized by the FAA. FAA Order JO 7210.3, *Facility Operation and Administration* (current), 4-3-1 states,

1. An RSA LOA must be developed in collaboration with all parties to the agreement, referencing Advisory Circular (AC) 150/5210-20, *Ground Vehicle Operations to include Taxiing or Towing an Aircraft on Airports,* and including site-specific procedures for all RSA activities.

2. An RSA LOA must be established even when the airport operator will not permit activity in the RSA during aircraft operations.

3. An RSA LOA must be a stand-alone agreement (*not combined with any other LOA*).

Every airport is different with unique operating characteristics, and the contents of each LOA will vary based on methods of compliance established in the ACM. The certificate holder, air traffic facility, and FAA technical operations are signatories to an RSA LOA. Additional parties are included as signatories when their access to the RSA is authorized by the airport operator. Sample LOA frameworks are available in AC 150/5210-20 (current) or available from the Air Traffic Manager.

RSA LOAs are to be included in the ACM. FAA Airport Certification and Safety Inspectors (ACSIs) approve the inclusion of the LOA in the ACM when the LOA is consistent with ACM methods of compliance for protecting the RSA and the activity within the RSA.

Recommended Actions.

Stakeholder Collaboration Meetings.
Facilitate regular meetings with all stakeholders, including FAA Air Traffic Control and Technical Operations, to discuss RSA activities, share insights, and collaboratively develop methods to limit, reduce, and eliminate the need for RSA access during aircraft operations.

Periodic Review and Updates.
Conduct regular reviews of RSA procedures defined in the ACM with all stakeholders, ensuring they are consistent with methods of compliance to limit, reduce, and eliminate RSA access and provide protection of the area and activity conducted.

Enhanced Training Programs.
Implement comprehensive training sessions for all personnel responsible for protecting and accessing the RSA. Focus on risk mitigation strategies and communication protocols implemented by the airport operator.

Enhanced Monitoring and Surveillance.
Monitor RSA activities in real-time when activity is authorized, ensuring compliance with risk mitigation strategies and facilitating identification of potential hazards.

Technology Utilization.
Assess the potential benefits of aircraft monitoring software along with Vehicle Movement Area Transmitters (VMATs) and Runway Incursion Warning Systems (RIWS) in enhancing situational awareness and safety (see CertAlert 25-01) when RSA activity is authorized.

Safety Culture Promotion.
Foster a safety-first culture within the airport environment by encouraging personnel to report safety concerns without fear of retribution and recognizing those who contribute positively to safety practices.

Cancellation. This CertAlert cancels CertAlert 16-07, Personnel and Equipment in the Runway Safety Area (RSA), dated October 14, 2016.

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