



U.S. Department  
of Transportation  
Federal Aviation  
Administration

# Advisory Circular

**Subject:** Supplemental Information for the  
Creation of Operating Procedures  
and Pilot Training Subjects Related  
to OpSpec/LOA B048

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**Change:**

Operations Specification (OpSpec)/Letter of Authorization (LOA) B048, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii, provides certificate holders (CH) and operators with an authorization to conduct commercial air tour operations under Title 14 of the Code of Federal Regulations (14 CFR) part [91](#), [121](#), or [135](#) in the State of Hawaii at altitudes below 1,500 feet above the surface, as set forth in 14 CFR part [136](#), § [136.75\(d\)](#).

For the purpose of this advisory circular (AC), unless otherwise noted, CH refers to part 119 CHs who may conduct commercial air tour operations in the State of Hawaii under part 121, 135, or 121/135 combined CHs. These authorizations are granted with conditions and limitations to enable CHs or operators to remain in visual meteorological conditions (VMC) and avoid entering unforecast or unreported instrument meteorological conditions (IMC). The authorization is not intended to be used for flight planning, and does not authorize a CH or operator to conduct a commercial air tour operation when the forecasted weather conditions would not permit the operation to remain in VMC at altitudes above 1,500 feet above the surface for the duration of the planned flight.

This AC describes an acceptable means, but not the only means, for CHs or operators who wish to obtain the authorization given through OpSpec/LOA B048 to create their specific operating procedures and pilot training subjects, as they pertain to meeting the conditions and limitations of OpSpec/LOA B048.

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, and the document is intended only to provide information to the public regarding existing requirements under the law or agency policies.

Robert M. Ruiz for  
Lawrence Fields  
Executive Director, Flight Standards Service

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## CHAPTER 1. GENERAL INFORMATION

- 1.1 Purpose of This Advisory Circular (AC).** This AC contains information pertinent to Title 14 of the Code of Federal Regulations (14 CFR) part [136](#) subpart [D](#). The information and guidance supports air tour operators in the State of Hawaii and is intended to assist certificate holders (CH) and operators with the development of operational processes and procedures and the pilot training recommended as part of the application package for Operations Specification (OpSpec)/Letter of Authorization (LOA) B048, Commercial Air Tour Operations Below 1,500 Feet Above the Surface in the State of Hawaii. OpSpec/LOA B048 provides the CH or operator with authorization to conduct commercial air tour operations below 1,500 feet above the surface in the State of Hawaii in order to remain in visual meteorological conditions (VMC) and avoid entering instrument meteorological conditions (IMC) that are not forecast or reported. The authorization is not intended to be used in flight planning as it does not authorize a CH or operator to conduct a commercial air tour operation when observed or forecast weather conditions would not permit the operation to remain in VMC at altitudes above 1,500 feet above the surface for the duration of the planned flight.
- 1.1.1** The authorization is given through OpSpec B048 to 14 CFR part [119](#) CH applicants or through LOA B048 to operators who conduct commercial air tour operations in accordance with 14 CFR part [91](#), § [91.147](#). The contents of this document do not have the force and effect of law and are not meant to bind the public in any way, and the document is intended only to provide information to the public regarding existing requirements under the law or agency policies.
- 1.2 Audience.** The primary intended audience is the commercial air tour operators who conduct such operations in the State of Hawaii and those who wish to obtain OpSpec/LOA B048.
- 1.3 Where You Can Find This AC.** You can find this AC on the Federal Aviation Administration's (FAA) website at [https://www.faa.gov/regulations\\_policies/advisory\\_circulars](https://www.faa.gov/regulations_policies/advisory_circulars) and the Dynamic Regulatory System (DRS) at <https://drs.faa.gov>.
- 1.4 Applicability.** This AC is applicable to commercial air tour operations in the State of Hawaii, particularly those operators who wish to obtain OpSpec/LOA B048 authorization to operate below the regulatory minimum flight altitude of part [136](#), § [136.75\(d\)\(1\)](#), which restricts any type of commercial air tour operations below 1,500 feet above the surface in the State of Hawaii.
- 1.4.1** Deviations below the minimum flight altitudes in § 136.75(d)(1) are authorized through OpSpec/LOA B048. The authorization does not allow deviation from § 136.75(d)(2) and is not intended to authorize operations closer than 1,500 feet to any person or property.
- 1.5 Related 14 CFR Parts.** Parts [61](#), [91](#), [120](#), [121](#), [135](#), and [136](#) subpart [D](#).

## **1.6 Related Reading Material (current editions).**

### **1.6.1 ACs:**

- AC [91-73](#), Parts 91 and 135 Single Pilot, Flight School Procedures During Taxi Operations.
- AC [120-74](#), Parts 91, 121, 125, and 135 Flightcrew Procedures During Taxi Operations.
- AC [120-92](#), Safety Management Systems for Aviation Service Providers.

### **1.6.2 FAA Order [8900.1](#) Sections:**

- Volume 3, Chapter 2, Section 2, Responsibility for Part 91 Letters of Authorization (LOA), Certificates of Waiver (CoW), and Letters of Deviation Authority (LODA).
- Volume 3, Chapter 18, Section 4, Part B Operations Specifications—En Route Authorization and Limitations.
- Volume 3, Chapter 19, Section 7, Flightcrew Qualification Curriculum Segments.
- Volume 3, Chapter 19, Section 10, Safety Assurance System: Flightcrew Recurrent Training Curriculums.

### **1.6.3 Other Documents. [FAA-H-8083-2](#), Risk Management Handbook.**

## **1.7 Definitions, Abbreviations, and Terms.**

**1.7.1 Air Tour Management Plan (ATMP).** As stated in Title 49 of the United States Code (49 U.S.C.) § [40128\(b\)\(1\)\(A\)](#), documents established by the Administrator, in cooperation with the Director of National Parks Service, for any national park or tribal land for which such a plan is not in effect whenever a person applies for authority to conduct a commercial air tour operation over the park.

**1.7.2 Commercial Air Tour Flight Profile (CATFP).** For the purposes of this AC and OpSpec/LOA B048, the lateral flight path and altitude above the surface that the tour pilot will fly from the departure point to the first Known Site Specific Area (KSSA), then via a flight path through a transition area designed to allow for lateral flight path options to avoid IMC, sensitive locations, and repetitive flights over the same lateral path at appropriate altitudes, to the next KSSA in a sequence of KSSAs, and return to departure point. The CHs or operators define their CATFPs in consideration of transition area, sensitive locations and areas, island-specific weather patterns, location and restrictions associated with units of the National Park System (NPS), prohibited areas, or restricted areas, temporary flight restrictions (TFR), etc. Each specific CH or operator may offer flight profiles to the public as individual flights or as part of a larger travel arrangement package. (National Park Service is commonly abbreviated as NPS; however, this AC uses NPS to refer to the National Park System.)

**1.7.3 Commercial Air Tour Operation.** As defined under 14 CFR part [110](#), § [110.2](#) and part 136, § [136.1\(d\)](#), a flight conducted for compensation or hire in an airplane or helicopter where a purpose of the flight is sightseeing. The FAA may consider the following factors in determining whether a flight is a commercial air tour:

- Whether there was a holding out to the public of willingness to conduct a sightseeing flight for compensation or hire;
- Whether the person offering the flight provided a narrative that referred to areas or points of interest on the surface below the route of the flight;
- The area of operation;
- How often the person offering the flight conducts such flights;
- The route of the flight;
- The inclusion of sightseeing flights as part of any travel arrangement package;
- Whether the flight in question would have been canceled based on poor visibility of the surface below the route of the flight; and
- Any other factors that the FAA considers appropriate.

**1.7.4 Cue-Based Weather Training.** For the purposes of this AC and OpSpec/LOA B048, training that enables the pilot to evaluate weather patterns and, based on visual cues observed in flight, to determine from those cues if it is appropriate to continue the flight as planned or if an alternate plan should be pursued. This training may include, but is not limited to, PowerPoint presentations, video or pictorial examples, and actual flights to train and evaluate the pilot's aeronautical decision-making ability based upon visual cues.

**1.7.5 Flight/Ground Observation.** For the purposes of this AC and OpSpec/LOA B048, each candidate Hawaii air tour pilot should undergo a ground observation and a flight observation. Observations are conducted by the Administrator, a person approved by the Administrator for the CH, or a person designated by the § 91.147 operator. During the ground observation, the candidate should demonstrate competency in the knowledge and skills and the important safety and administrative aspects of the conditions and limitations of the OpSpec/LOA B048 authorization and part 136 as applied when planning commercial air tour operations. During the flight observation, the candidate Hawaii air tour pilot flies an aircraft through a representative CATFP and demonstrates appropriate navigation, altitude maintenance, cue-based weather evaluation and aeronautical decision making, radio calls, operator-accepted and published KSSA procedures, pilot weather reporting techniques, traffic awareness and avoidance, compliance with ATMP restrictions, and avoidance of culturally sensitive locations within transition areas.

**1.7.6 Interim Operating Authority (IOA).** Interim authority that is granted upon application for operating authority by the Administrator under § [136.41](#) to a commercial air tour operator for commercial air tour operations over a national park or tribal land for which the operator is an existing commercial air tour operator, as defined by § [136.33\(b\)](#).

- 1.7.7 Known Site Specific Area (KSSA).** For the purposes of this AC and OpSpec/LOA B048, an area of heightened visual interest to passengers designated by latitude and longitude coordinates and altitudes and designed by the commercial air tour operator where an aircraft may maneuver for the purpose of conducting commercial air tour operations, as defined by § 136.1(d). An entire route of flight within a CATFP could conceivably be designated as a KSSA.
- 1.7.8 Park Unit.** As designated by the National Park Service, any area of land or water administered by the Secretary of the Interior through the National Park Service for park, monument, historic, parkway, recreational, or other purposes.
- 1.7.9 Property.** For the purposes of this AC and OpSpec/LOA B048, any vehicle, vessel, or structure.
- 1.7.10 Transition Area/Segment.** For the purposes of this AC and OpSpec/LOA B048, an area created, designed, and selected by the CH or operator that an aircraft may utilize for the purpose of transitioning from one KSSA on a CATFP to another KSSA while conducting commercial air tour operations, as defined by § 136.1(d).
- 1.8 AC Feedback Form.** For your convenience, the AC Feedback Form is the last page of this AC. Note any deficiencies found, clarifications needed, or suggested improvements regarding the contents of this AC on the Feedback Form.

## CHAPTER 2. REGULATORY REQUIREMENT AND AUTHORIZATION

### 2.1 Regulatory Requirement. Section § [136.75\(d\)](#) states:

*“Minimum flight altitudes.* Except when necessary for takeoff and landing, or operating in compliance with an air traffic control clearance, *or as otherwise authorized by the Administrator* [emphasis added], no person may conduct an air tour in Hawaii:

- (1) Below an altitude of 1,500 feet above the surface over all areas of the State of Hawaii, and,
- (2) Closer than 1,500 feet to any person or property; or,
- (3) Below any altitude prescribed by Federal statute or regulation.”

**2.2 Authorization.** In the interest of enhancing aviation safety among commercial air tour operators in the State of Hawaii, the FAA provides CHs and operators with the option of obtaining an authorization to deviate from § 136.75(d)(1) to conduct commercial air tour operations below 1,500 feet above the ground or water surface below for the sole purpose of remaining in VMC and of avoiding entering IMC that was not forecast or observed and reported. The deviation is authorized by the Administrator through OpSpec/LOA B048. The authorization is not intended to allow deviation from § 136.75(d)(2), that states air tour operations may not be conducted closer than 1,500 feet to any person or property.

**2.2.1** If a CH or operator wishes to obtain such an authorization, the Administrator will consider each individual application in its entirety. The FAA requires the inclusion of additional aircraft equipment, safety risk analysis, appropriate pilot training, and FAA acceptance of operating procedures (as they pertain to flight operations below 1,500 feet above the surface, as authorized through OpSpec/LOA B048) before such authorization is issued to Hawaii commercial air tour operators who apply for OpSpec/LOA B048. The FAA recommends that CHs and operators collaborate and establish industry consensus procedures to be applied by all air tour providers operating in the same airspace where cooperation among commercial air tour providers would enhance safety. This collaborative approach to developing commonly applicable procedures and methods may streamline application approval processes for all participants.

**2.3 OpSpec/LOA B048.** An air carrier CH may apply for and may be issued OpSpec B048, and a noncertificated commercial air tour operator who conducts operations under part [91](#) may apply for and may be issued LOA B048. The Honolulu Flight Standards District Office (FSDO) will approve the commercial air tour operations document(s) and manual(s), as applicable, and make the determination of whether to issue OpSpec/LOA B048. If the Honolulu FSDO is not the responsible Flight Standards office for the CH or operator, the responsible Flight Standards office should forward the application package to the Honolulu FSDO for review and approval. Upon its approval, the Honolulu FSDO will notify the responsible Flight Standards office of their decision, at which point the responsible office will issue OpSpec/LOA B048 in the Web-based Operations Safety System (WebOPSS). The conditions and limitations contained in the

CH's or operator's specific authorization given through OpSpec/LOA B048 are only applicable to commercial air tour flights conducted below 1,500 feet above the surface in the State of Hawaii in order to remain in VMC and avoid entering unforecast or unreported IMC.

**2.4 Operations Over Units of the NPS.** In accordance with 49 U.S.C. § [40128](#), as codified in 14 CFR part 136 subpart [B](#), commercial air tour overflights of national parks are subject to additional restrictions, as outlined in a park unit ATMP, an FAA-issued IOA, or FAA/National Park Service/Operator Air Tour Voluntary Agreements (VA). National park units subject to such additional restrictions in the State of Hawaii include, but are not limited to: Kaloko-Honokōhau National Historic Park (NHP), Pu'uhonua o Hōnaunau NHP, Pu'ukoholā Heiau National Historic Site (NHS), the USS *Arizona* Memorial, Hawaii Volcanoes National Park (NP), Haleakalā NP, and Kalaupapa NHP.

**2.4.1** Independent from the authorization given through OpSpec/LOA B048, all commercial air tour operators must (per § [136.37](#)) be authorized by OpSpec/LOA B057, as applicable, if they wish to conduct, or are currently conducting, operations over a national park under an ATMP, an IOA, or a VA within half a mile outside the boundary of any national park unit, or over an abutting tribal land, during which the aircraft flies (except as provided in § [136.35](#)):

- Below 5,000 feet above the surface (except for the purpose of takeoff or landing, or to take action to ensure the safe operation of the aircraft), or
- Less than 1 mile laterally from any geographic feature within the park (unless more than half a mile outside the boundary).

**Note:** CHs and operators should consider including the following statement as a part of the commercial air tour operator's accepted operating procedures to ensure pilots maintain compliance with part 136:

“With respect to the airspace over, and within ½ mile of the boundaries of the following national park system units: Kaloko-Honokōhau NHP, Pu'uhonua o Hōanunau NHP, Pu'ukoholā Heiau NHS, the USS Arizona Memorial, Hawaii Volcanoes NP, Haleakalā NP, and Kalaupapa NHP, the information contained within this document or manual applies to all commercial air tour operators, as defined by 14 CFR part 136, in receipt of interim operating authority (IOA). After Air Tour Management Plans (ATMP) are developed for these parks units, if the Administrator revises applicable conditions and limitations for safety that are more restrictive than those in the ATMP, the more restrictive parameters will apply. If, after an ATMP is developed, the language of this document or manual is less restrictive than the ATMP, the ATMP will control and this document or manual will be updated within 180 days of the ATMP being developed to reflect the more restrictive parameters set forth in the ATMP. This document or manual will not supersede, circumvent, or otherwise change any aspect of, or implementation of the ATMP, when developed, for these parks or park units or both. Please refer to the map legends for any specific national park or park unit flight restrictions.”

## CHAPTER 3. AUTHORIZATION PROCESS

- 3.1 Process Overview.** A commercial air tour operator may apply for and receive from the Administrator an authorization to be able to conduct commercial air tour operations below 1,500 feet above the surface in the State of Hawaii through OpSpec/LOA B048, in order to remain in VMC and avoid entering unforecast or unreported IMC. After each applicant's submission of the complete application package, the FAA will review each individual application package and will discuss any necessary changes or additional necessary information with the applicant. After the Administrator has found the application package to be acceptable, the Administrator may issue OpSpec/LOA B048, as applicable.
- 3.2 Step 1: CH or Operator Notification.** The CH or operator notifies the Administrator of their interest to obtain the authorization given through OpSpec/LOA B048. The notification may be submitted through the Safety Assurance System (SAS) platform, via email, or in a paper form (as applicable for part [91](#) operators or CHs).
- 3.3 Step 2: Application Package Submission.** A CH or operator submits the OpSpec/LOA B048 application package to the Administrator. Steps 1 and 2 may be done simultaneously. The original application package and any future revisions or changes to any portion of it should be submitted in a manner acceptable to the Administrator. It is recommended that the application package includes:
- 3.3.1** A letter addressed to the Administrator explaining the CH's or operator's need for the authorization given through OpSpec/LOA B048 and the nature and scope of the intended operations.
  - 3.3.2** The CH's or operator's specific operating procedures, considering the items described in this AC, including the manner in which the CH or operator intends to manage ground and flight operations, weather minimums and weather sources, recordkeeping, any prohibited operations, etc., as further described in Chapter [4](#), Operating Procedures.
  - 3.3.3** The name and a description and definition of the KSSA in which the CH or operator proposes to conduct commercial air tour operations, and the CH's or operator's specific tour flight profiles. These areas may be described and defined by latitude and longitude coordinates, altitudes, and distances from reference points (as applicable), and a pictorial description of the CH's or operator's air tour flight profiles that is depicted on the applicable sections of the version of the Visual Flight Rules (VFR) Hawaiian Islands Sectional Chart that is current at the time of the application submission, as further explained in Chapter 4.
  - 3.3.4** The list of the instrumentation on the aircraft to be utilized when conducting commercial air tour operations in the State of Hawaii under the authorization given through OpSpec/LOA B048. The aircraft list should also include the aircraft's make, model, and series (M/M/S); registration number; and instrument flight rules (IFR) equipment as required by § [91.205\(d\)](#) installed (at a minimum, instruments and equipment capable of conducting at least one type of instrument approach procedure (IAP) available in the area

of operation). It is also recommended that aircraft are equipped with an operable Automatic Dependent Surveillance-Broadcast (ADS-B) In and Out system. In addition, the CH or operator should submit any applicable Supplemental Type Certificate (STC), minimum equipment lists (MEL), and instrument inspection and maintenance program, as further explained in Chapter [5](#), Aircraft Equipment.

**3.3.5** The CH's or operator's specific pilot training (as further explained in Chapter [6](#), Pilot Training) should include:

- Pilot ground and flight training,
- Training on each KSSA where the applicant intends to operate,
- Entry and exit points to the different KSSAs,
- Geographical areas and islands in the State of Hawaii,
- Areas of interest and commonly flown sightseeing locations, and
- Training for IMC operations on the specific aircraft to be utilized.

**3.3.6** The manner in which the CH or operator intends to integrate the use of safety risk analysis to their operations.

**3.3.7** The manner in which the CH or operator intends to perform recordkeeping of, at a minimum, the following:

**3.3.7.1** Completed performance plans. Recordkeeping may take on many forms, depending upon the operator's method of performance planning. For example, for each group of helicopters in the fleet, and for the maximum pressure altitude where tour operations will be conducted, a maximum allowable gross takeoff weight (GTOW) may be associated with each increasing degree of temperature. The CH or operator should develop a procedure requiring the max allowable GTOW to be posted and maintained throughout the day, and this weight and the time/temperature could be recorded on the performance section of a passenger list for each flight. Providing the actual GTOW based on fuel and payload is less than the max allowable GTOW, the flight will remain within performance limits. The record, in the form of a passenger list/performance review, should be retained for as long as the operator normally retains such documents, usually not less than 30 days.

**3.3.7.2** Flight logs, including the passenger list and performance review for each flight.

**3.3.7.3** Maintenance logs, indicating all servicing and maintenance performed, MEL deferrals and extensions, etc., should be available to pilots and should be consulted before initiating operations at the beginning of each crew change.

**3.3.7.4** Pilot training records.

**3.3.7.5** Attendance to the formal commercial air tour safety meeting.

**3.3.8** The operating procedures and pilot training subjects, which should be presented in an organized manner and include the following general information:

- Effective date,
- Purpose,
- Distribution list,
- Revision date,
- Explanation of changes,
- List of effective pages,
- Record of revisions,
- Table of contents, and
- Definitions, abbreviations, and symbols.

**3.4 Step 3: FAA Application Package Review.** The Honolulu FSDO will review each submitted package and will consider each CH's and operator's individual operation, discuss any necessary changes to the application package with the CH or operator, and make a determination if the authorization will be issued. If the Honolulu FSDO is not the responsible Flight Standards office for the CH or operator applicant, the applicant will submit the application package to their responsible Flight Standards office, and that office will then forward the complete application package to the Honolulu FSDO for coordination, review, and concurrence with the issuance of OpSpec/LOA B048.

**3.5 Step 4: Changes to Application Package.** If changes are needed, the CH or operator will revise the application package and will resubmit the revised version of the application package to the Administrator, via the Honolulu FSDO, for further review.

**Note:** Steps 3 and 4 might be repeated if the Administrator finds that additional changes are necessary to any part of the application package.

**3.6 Step 5: Decision for Authorization Issuance.** The Administrator notifies the CH or operator in writing of the decision to issue OpSpec B048 or LOA B048, and the addition of such to OpSpec A005. If the CH's or operator's application is denied, the CH or operator may petition for reconsideration of that decision under 14 CFR part [119](#), § [119.51\(d\)](#).

**Note:** Steps 2 through 4 above should be repeated any time the CH or operator proposes to amend any documents that were relied upon in the determination of the issuance of the CH's or operator's original OpSpec/LOA B048, prior to the change or as requested by the Administrator. The Administrator will respond with acceptance/approval or a denial following the final submission of the CH's or operator's amendments to the documents submitted as part of the application

package. The CH's or operator's utilization of an amendment to the documents that were relied upon in the determination of the issuance of the CH's or operator's OpSpec/LOA B048 that changes the FAA determination could lead to initiation of removal of the authorization through the § 119.51 process. Additionally, a CH or operator who has been issued the authorization via OpSpec/LOA B048 who requests amendment to the terms of that OpSpec should follow the amendment procedures in § 119.51.

- 3.6.1** For CHs, the operating procedures document or manual accepted by the Administrator should be made an appendix to the CH's required General Operations Manual (GOM), and any additional training approved by the Administrator should be included in, or made an appendix to, the CH's required approved training program. As for part 91 operators, the operating procedures document or manual accepted by the Administrator, and the training document or manual approved by the Administrator, should be kept by the operator in a paper or electronic file to be utilized, as stated as a condition of LOA B048.

## CHAPTER 4. OPERATING PROCEDURES

- 4.1 Design, Description, and Definition of Areas of Operations.** CHs and operators may derive significant benefit from collaborating with each other to establish consensus standards to avoid congested areas, sensitive locations, areas that lack reasonably safe precautionary landing sites, and to operate within KSSAs in a cooperative manner. Although each CH or operator is responsible for developing their own policies, procedures, and training, ideally these would be based on collaborative Hawaiian air tour industry consensus standards. Industry groups can often facilitate development of consensus standards and common procedures. The CH or operator may present the following information in their operating procedures package to the Administrator for acceptance:
- 4.1.1 KSSAs.** These areas may be designed by each CH or operator who applies for OpSpec/LOA B048. The CH or operator may use latitude and longitude coordinates, or distances from reference points and flight altitudes. These may be coordinated with other CHs and operators working in the same KSSA airspace. The KSSAs may also include special restrictions applicable to each area that may be presented in narrative form or as a pictorial description of specific applicable areas on the VFR Hawaiian Islands Sectional Chart or other map, chart, or aerial photo that provides sufficient detail, and in a manner acceptable to the Administrator.
- 4.1.2 CATFPs.** These profiles designated by each CH or operator may include specific flight altitudes, KSSAs, and transition areas to be flown, locations to be avoided, identification of air traffic restricted or prohibited areas, flight patterns in the general vicinity of specific landmarks or KSSAs, national park units, and transition areas, as defined and designed in cooperation with other commercial air tour operators working in the same areas. CATFPs may be depicted pictorially over the specific applicable areas of the VFR Hawaiian Islands Sectional Chart or other map, chart, or aerial photo that provides sufficient detail and in a manner acceptable to the Administrator.
- 4.1.3 Transition Areas.** Transition areas should be wide swaths of airspace offering unlimited variation in lateral adjustment of flight paths between one KSSA and the next. CATFPs are not intended to be flown along narrow course lines, but rather, may be flown through transition areas along any flight path across the width of the area as needed to maximize separation from potentially hazardous weather, avoid overflying the same locations repeatedly, maximize access to potential safe precautionary landing sites, and avoid flying over known sensitive areas. The transition area should include CH or operator designated minimum routine flight altitudes (reflecting the 1,500 feet above the surface mandatory minimum altitude per § 136.75(d)). Sensitive locations throughout the transition area should be marked on the transition area chart or map. The width and extent of transition areas between KSSAs should begin at an exit point from one KSSA and end at an entry point adjacent to the next KSSA that feeds the flight patterns surrounding that KSSA (as cooperatively developed among CHs and operators working in the same KSSAs). Transition area flight segments may be presented as a pictorial description over specific applicable areas of the VFR Hawaiian Islands Sectional Chart or other maps or charts that provide sufficiently detailed air tour augmentation (depicting sensitive areas,

areas that do not offer reasonably safe precautionary landing areas, and other details) in a manner acceptable to the Administrator.

**4.1.4 Island-Specific Weather Complications.** Many CHs or operators already have strong and well-considered policies, procedures, and training programs that include weather information and risk mitigating policies and procedures associated with the elements of OpSpec/LOA B048. Such material frequently predates the implementation of this AC or the supported OpSpec. This is not always the case. Where weather complications are not adequately discussed, the CH or operator should enhance the weather information forming the basis of appropriate policy, procedure, and training material to ensure all pilots will be aware of what climatic and local conditions produce reduced ceilings and visibilities, moderate or greater turbulence, etc., where and when these conditions are more likely to be encountered, and why. The objective of OpSpec/LOA B048 is to ensure that all CHs and operators who wish to participate in the benefits of OpSpec/LOA B048 will meet the minimum equipment, policy, procedure, and training that complies with the requirements established within OpSpec/LOA B048. Accepted procedures that preexist any submittal for OpSpec/LOA B048 should not be replicated but should be cited or referenced in the submittal. The CH or operator should describe the climate tendencies of specific areas within each island in which they propose to operate under this authorization while conducting commercial air tour operations.

**4.2 Reporting Points, Radio Communications and Frequencies, Use of Aircraft Lights, and ADS-B Procedures.** The CH or operator may present the following information in their operating procedures package to the Administrator for acceptance. The information may be presented in a similar manner as described in this AC or in any other manner acceptable to the Administrator.

**4.2.1** The CH's or operator's commercial air tours operations manual or document should encourage the use of all installed lights, including landing, navigation, and anticollision lights, when operating below 1,500 feet above the surface and their use when operating at and above 1,500 feet above the surface, especially when flying in high density traffic areas such as approaching an initial entry point for a KSSA or while in the flight pattern within a KSSA area.

**4.2.2** Consistent radio phraseology procedures should be considered for inclusion in the CH's or operator's procedures and should be adhered to. Discrete common traffic advisory frequencies (CTAF) for each island have been established. These facilitate air tour aircraft position and weather reporting and are published on the VFR Hawaiian Islands Sectional Chart. The FAA recommends CHs and operators establish position reports and locations where these reports should be transmitted, as well as common phraseology for weather reports (to include location and adverse weather phenomenon observed). These should be adopted and outlined in each CH or operator procedure manual for each island and for each KSSA where a discrete frequency has been assigned. Air tour operations in KSSAs that experience high density air traffic may benefit from discrete CTAFs to be monitored from before crossing the entry waypoint until after passing the exit waypoint, for weather and traffic reporting while conducting operations in and around the KSSA.

After passing the exit waypoint, the pilot should select and monitor the published island-specific CTAF.

**Note:** There are specific procedures for requesting a CTAF. Consult with the Federal Communications Commission (FCC) field office in Honolulu for appropriate procedures.

- 4.2.3** The CH or operator may also collaborate with other air tour operators to establish and document common procedures for entering, transiting, or exiting a KSSA. Absent any recommended KSSA-specific position reporting point, these procedures should consider including how all pilots will communicate the following in the interest of safety: tail number or ATC accepted call sign, position or area of flight (using cardinal directions and approximate distance from depicted waypoints along the CATFP), altitude, and intentions.
- 4.2.4** CHs and § 91.147 operators are encouraged to install and operate ADS-B on all air tour flights regardless of the issuance of OpSpec/LOA B048. CHs and operators who have been issued OpSpec B048 must ensure that installed ADS-B In and Out systems are operable and in transmit mode at all times while conducting air tour flights.

**4.3 Minimum Flight Altitudes.** The CH or operator should present to the Administrator the minimum flight altitudes at which it intends to operate under the authorization, which will not be authorized lower than the following:

- Flights over areas that are neither populated nor congested: No flights will be conducted at any altitude lower than 500 feet above the surface.
- Flights over populated or congested areas, unless operating in compliance with an air traffic control (ATC) clearance: No flights will be conducted at any altitude lower than 1,500 feet above the surface.

**Note:** Any challenging weather situation that requires descent below 1,500 above the surface to the extent necessary to maintain Class E cloud clearance or to enter Class G airspace below a reduced ceiling is considered significant for the purposes of reporting hazardous meteorological conditions in accordance with part [135](#), § [135.67](#) or conditions and limitations in LOA B048. Reporting hazardous weather (that requires an altitude deviation, a course reversal, or a precautionary landing) is secondary to the essential duties of maintaining aircraft control and navigating toward safety. Operators should develop procedures that meet the requirement of reporting hazardous weather conditions in accordance with § 135.67 or OpSpec B048 necessitating a descent deviation below 1,500 feet above the surface should generally be accomplished prior to initiating the descent if time permits. If time is of the essence and a deviation is necessary immediately to ensure the safety of flight, the reporting of hazardous weather should be accomplished as soon as practicable following return to 1,500 feet above the surface or a higher altitude.

- 4.4 Procedures for Flight Operations Below 1,500 Feet.** The CH or operator should present to the Administrator established communication procedures and actions to be taken by the pilot that explain the manner in which the flight may be continued in the event that there is a need to continue the flight operation at an altitude below 1,500 feet above the surface to avoid entering IMC. The communication procedures should include tail number or ATC-accepted call sign, position or area of flight (using accepted names of areas or cardinal directions and approximate distance from depicted waypoints along the CATFP), altitude, and intentions. The FAA recommends that communication procedures state that use of any unnecessary conversation or “chatter” or both on accepted or published frequencies is highly discouraged while conducting commercial air tours (to include cruise flight through transition areas). The CHs or operators should have established procedures to ensure that the pilots are knowledgeable of the following pilot-in-command (PIC) responsibilities:
- 4.4.1** If an in-flight deviation necessitates immediate action or deviation from any of the CH’s or operator’s accepted operating procedures, the PIC may deviate to the extent necessary in the interest of the safety of the flight to meet that circumstance.
  - 4.4.2** The PIC of an aircraft is directly responsible for, and is the final authority as to, the safe operation of that aircraft.
  - 4.4.3** In the event the pilot has deviated from the CH’s or operator’s accepted operating procedures or regulatory requirements, the pilot should report the deviation event to the Chief Pilot or designated supervisor within 24 hours of such deviation.
  - 4.4.4** Each person must comply with the requirements of § [91.3](#) and/or § [135.19](#), as applicable.
- 4.5 Weather Minimums for Commercial Air Tour Operations Below 1,500 Feet Above the Surface.** The CH or operator should present to the Administrator their weather minimums when conducting commercial air tour operations as part of their operating procedures for acceptance. These weather minimums must not be lower than those set under any regulatory requirement.
- 4.6 Weather Information and Resources.** The CH or operator may present to the Administrator the following weather-related information as part of their operating procedures for acceptance:
- 4.6.1** Prior to departure on each individual commercial air tour flight, and in addition to any other regulatory requirement, when weather conditions are marginal or available weather information is minimal prior to departure, pilots should obtain updated weather information while en route. En route sources may include Flight Service Stations (FSS), the CH’s or operator’s ground support personnel by discrete 2-way radio frequency or satellite phone, or CTAF reports that are either broadcast or solicited.
  - 4.6.2** When weather conditions are encountered that require a vertical deviation below 1,500 feet above the surface on a CATFP, the PIC should use their best judgment to safely circumnavigate the weather. OpSpec/LOA B048 authorizes air tours flights in Hawaii to deviate below 1,500 feet above the surface for the sole purpose of remaining in

VMC. The FAA recommends air tour pilots deviate below 1,500 feet above the surface if a lateral deviation is not possible, to avoid low ceilings and areas of reduced visibility over land (for both airplanes and helicopters below 3 miles) and over water (for airplanes below 3 miles and helicopters below 2 miles) that were not forecast or reported. If visibility deteriorates below these values, and the flight is in rain, the pilot should execute an escape procedure such as changing course toward lower terrain and known improved visibility, descending as needed below 1,500 feet above the surface but not below 500 feet above the surface, and if conditions do not improve, in helicopters, executing a precautionary off-airport landing where possible. If over water, the helicopter pilot should reduce speed and proceed at  $V_{MINI}$  toward the closest known area of better visibility conditions accessible without crossing higher terrain and prepare to execute a precautionary off-airport landing on shore or to execute an inadvertent instrument meteorological condition (IIMC) escape procedure. In doing so, the following should be accomplished:

- The pilot should discontinue tour narratives, focus on flying the aircraft toward better weather conditions or making a precautionary off-airport landing.
- Report the hazardous weather condition encountered in compliance with § 135.67 or LOA B048 conditions and limitations (via radio communication with other pilots in the vicinity and ATC/FSS of where and what kind of hazardous meteorological condition was encountered).
- When potentially hazardous meteorological conditions are encountered, reporting those conditions in accordance with § 135.67 is mandatory.

**4.7 Unforecast or Unreported Weather Procedures.** The CH or operator should include the procedures to be followed when unforecast or unreported weather below the allowable minimums is encountered in their operating procedures and training.

**4.8 Safety Risk Analysis.** Risk analysis is a multistep process aimed at mitigating the impact of risks on flight operations. Performing risk analysis prior to each flight minimizes the vulnerability of the flight operations and enhances safety.

**4.8.1** The CH or operator should present to the Administrator the method(s) they will utilize to analyze, mitigate, and manage risks while conducting commercial air tour operations under the authorization.

**4.9 Prohibited Operations.** The CH or operator should include a description of their specific prohibited operations, if any. For example, CHs and operators may choose to prohibit special VFR departures. Special VFR departures are not prohibited by § 136.75(d). However, in the case of a special VFR departure within controlled airspace, if it is not possible to climb unrestricted to 1,500 feet above the surface before leaving the Class D or C airspace and entering the Class E airspace, the air tour flight may not be able to comply with § 136.75(d) and should be postponed. Razorback ridge crossing at or above 300 feet above the surface is no longer permitted; all terrain must be crossed at or above 1,500 feet above the surface. Lateral separation between the aircraft and persons or property is limited to a minimum of 1,500 feet. Lateral separation between the air tour

aircraft and precipitous terrain is not established by regulation. OpSpec/LOA B048 will recommend CHs and operators to establish a minimum lateral separation between precipitous terrain and the air tour aircraft flight path of not less than 1,500 feet.

## CHAPTER 5. AIRCRAFT EQUIPMENT

- 5.1 Use of ADS-B.** Cost analysis is not required for this OpSpec. One can operate air tours without the benefit of ADS-B and therefore without benefit of OpSpec B048, provided the CH or operator air tour flights always remain at or above 1,500 feet above the surface. The manner in which a portion of § [136.75](#) is worded (“or as authorized by the Administrator”) permits the FAA to establish criteria that is required to receive such OpSpec authorization.
- 5.2 ADS-B as a Condition of OpSpec B048 Issuance.** In the case of ADS-B, though it is not required for general flight operations in Class G or E airspace over Hawaii, the ADS-B system, when operable and when flight crewmembers are adequately trained in the use and interpretation of traffic information provided by the ADS-B In traffic display, provides significantly improved situational awareness for all participating aircraft nearby, regardless of proximity of ground stations. This is especially important to those air tour aircraft operating below 1,500 feet above the surface to avoid low ceilings. Therefore, the FAA will consider whether the air tour aircraft proposed in an application has an ADS-B system in determining whether to issue OpSpec B048 to the applicant.
- 5.3 IFR Instrumentation.** In the case of IFR instrumentation that supports voluntary compliance with § 91.205(d), air tour operations that are conducted within airspace that frequently experiences rapid onset of low ceilings or poor visibility due to rain showers, the equipage may provide essential information that will assist an IFR rated pilot to safely negotiate an inadvertent encounter with IMC, regardless of whether the flight is conducted under OpSpec B048 or not.
- 5.4 List of Instruments and Equipment.** As part of the OpSpec B048 application package, the CH or operator should present a list of instruments and equipment to the Administrator installed on each aircraft used to conduct commercial air tour operations under OpSpec/LOA B048 authorization. Though the FAA recommends that all CHs or operators install the following equipment regardless of their intention to apply for OpSpec/LOA B048, the FAA will take into account whether the air tour aircraft proposed in an application has the following equipment when determining whether to issue OpSpec/LOA B048:
- 5.4.1** All IFR equipment required under § [91.205\(d\)](#).
- Note:** Modern 3-inch circular presentation self-contained electronic flight instrument system (EFIS) displays combining data otherwise shown on multiple instruments that comply with § 91.205(d) can usually be installed in small helicopters.
- 5.4.2** Navigation equipment capable of conducting at least one type of IAP.
- Note:** This is generally a wide area augmentation system (WAAS)-enabled Global Positioning System (GPS) that is compatible with GPS approaches that are available at most airports in Hawaii.

**5.4.3** ADS-B In and Out system that provides visual and audible traffic awareness alerts.

**Note:** ADS-B In and Out provides ship to ship sharing of traffic awareness depictions that may assist pilots in avoiding mid-air collisions. Where ADS-B broadcasts are within range of an FAA ground receiver, the ADS-B broadcasts may be recorded and available to the public. This second-by-second record of flight location and altitude may assist FAA inspectors in identifying compliance deficiencies and safe practices, which could lead to appropriate interventions, compliance counselling, publication of systemic findings, Federal Aviation Administration Safety Team (FAASTeam) outreach efforts, and if appropriate, enforcement action.

**5.4.4** Copies of STCs for the above equipment, if newly installed.

**5.4.5** An updated MEL, as applicable.

**Note:** Operation below 1,500 feet above the surface is not authorized under OpSpec/LOA B048 if the instruments and equipment listed above are not operable.

## CHAPTER 6. PILOT TRAINING

- 6.1 New Hire/Initial/Recurrent Pilot Ground and Flight Training.** As part of the application package, CHs who wish to obtain OpSpec B048 must (per 14 CFR part [135](#), § [135.329\(e\)](#)) include pilot training subjects to support the conditions and limitations stated in OpSpec B048. Similarly, as part of the application package, operators who wish to obtain LOA B048 should include pilot training subjects to support the conditions and limitations stated in LOA B048. (This section applies to both part [91](#) operators and all CHs, including those who use only one pilot in the CH's operations.)
- 6.1.1** Air tour procedures and flight training should be considered part of the normal training program where possible and be conducted in accordance with a separate curriculum segment solely involving air tour operations within the training program. The new hire initial and recurrent (as applicable) pilot ground and flight training should demonstrate that the CH or operator will provide pilots with the necessary knowledge and skills to conduct the commercial air tour flights and should include operations below 1,500 feet, as authorized by OpSpec/LOA B048. If a CH has already incorporated air tour training subjects into their FAA-approved training program, a pilot trained in accordance with such approved training program may receive credit for such training in order to comply with the parameters set forth in the operator's accepted B048-related operating procedures.
- 6.1.2** The training subjects should include the following, as it pertains to the authorization given through OpSpec/LOA B048:
1. The manner in which the CH or operator intends to conduct pilot evaluations and observations (every 12 calendar months, with a grace period (§ [135.301\(a\)](#)) preceding and following the due month);
  2. The manner in which the CH or operator intends to train and evaluate their flight instructors;
  3. The manner in which the CH or operator intends to conduct pilot training and evaluations, including the procedures utilized on each specific aircraft that considers the flight characteristics of each aircraft; and
  4. The manner in which the CH or operator intends to evaluate their pilots on representative KSSAs during recurrent flight evaluations. The flight training prior to recurrent flight evaluations should be detailed in the CH's or operator's specific commercial air tour operator approved training subjects.
  5. CHs and operators should emphasize the continuous in-flight identification of adequate precautionary and emergency helicopter landing sites, and to minimize flight over areas where such sites may not be available in KSSAs and in transition areas. CHs and operators should provide specific training and checking in such continuous awareness and ability to utilize identified off airport landing sites in the event of an emergency or precautionary off airport landing.

- 6.1.3** CHs' and part 91 operators' ground training must be conducted by an instructor who is qualified by the CH or the operator to provide ground instruction (refer to § [135.388](#)). In the case of operators and CHs who use only one pilot in their operations, the ground training may be self-taught. A record of the training must be kept and made available to the Administrator upon request.
- 6.1.4** The hours credited for meeting the minimum hours for ground training, as per the CH's or operator's designated training, should be administered by a CH or operator air tour authorized instructor in a formalized classroom format or via web-based training (WBT) that is capable of tracking the pilot's unique user name and password, online training hours, and final completion scores. Any training conducted online may also be evaluated verbally and documented in the pilot's training record by a company-approved ground instructor, flight instructor, or the Administrator.
- 6.1.5** Current and qualified authorized air tour ground and flight instructors may take credit for the ground and/or flight training for which they teach. All instructors should remain current on the latest air tour developments to impart this information to their students.
- 6.1.6** The Administrator, or a person approved by the Administrator, should perform the ground and flight observations of CHs who use only one pilot in the CH's operations.
- 6.1.7** If pilots are currently qualified and operating with a specific CH under OpSpec B048 (HQ Revision: 020) authorization, credit may be given for previous training and observations toward the conditions and limitations set forth under the revised OpSpec B048 (HQ Revision: 030) for continued air tour operations with that same CH or operator. Similarly, for pilots currently qualified and operating with a specific § 91.147 LOA holder under LOA B548 (HQ Revision: 000), credit may be given for previous training and observations toward the conditions and limitations for continued air tour operations with that same LOA holder set forth under the revised LOA B048 (HQ Revision: 030). To receive credit for this training and observation, records of successful completion under the previous authorization and documentation that includes all aspects of the revised authorization given through OpSpec/LOA B048 should be retained for the same period as other training documentation. These records should be available to the Administrator for review and inspection.
- 6.2 Requalification for Ground and Flight.** It is recommended that the CH or operator consider including policy and procedures for recovering currency lapses for pilots that did not complete recurrent training and did not satisfactorily complete an air tour ground and flight observation/evaluation conducted by an authorized air tour observer prior to the end of the 12 calendar month plus grace month term (§ 135.301(a)). If a pilot's currency, as per the CH's or operator's specific approved training curriculum of the CH's or operator's accepted operating procedures and of part [136](#), lapses for any reason as per the CH's or operator's set timelines (i.e., 12 calendar months plus the following grace month), they should be requalified. The requalification may depend on how long the pilot has been noncurrent as per the CH's or operator's authorized or accepted operational training procedures.

- 6.2.1** Consider applying the following range of requalification options. If there is a currency lapse of less than 24 calendar months, requalification may consist of the pilot completing recurrent ground training and satisfactorily completing a recurrent flight observation/evaluation before using the authorization given through OpSpec/LOA B048. If there is a currency lapse of 24 calendar months or more, the CH or operator may choose to require the pilot to complete all initial qualification training subjects and satisfactorily complete the ground/flight observation required for initial qualification before using the authorization given through OpSpec/LOA B048.
- 6.3 Aircraft-Specific Training.** Ground (G) and flight (F) training, whether this is part of the part 135 approved training program already or, in the case of § 91.147, a new standalone requirement, should specify that each pilot receive training and demonstrate proficiency in the following maneuvers specific to each aircraft the pilot will operate under the authorization:
- Aircraft-specific performance computation (G),
  - Aircraft systems (G/F),
  - Abnormal and emergency procedures (G/F),
  - Autorotation (F),
  - Hover autorotation (G/F), and
  - IMC recovery procedures (G/F).
- 6.4 KSSA Familiarization Flights.** The pilot training subjects should specify that all pilots complete a CATFP and KSSA familiarization flights for each KSSA that they will be authorized to fly. The familiarization flight should include:
- 6.4.1** At least two complete CATFP familiarization flights to each authorized KSSA should be done as part of the initial KSSA familiarization process. The familiarization flights should be completed prior to the initial flight observation.
- 6.4.2** All familiarization flights should be conducted under the direct supervision of a KSSA-qualified instructor, as designated by the CH or operator, or the Administrator.
- 6.4.3** When a KSSA-qualified instructor is conducting a CATFP familiarization flight, they should occupy a pilot seat and be designated by the CH or operator as PIC of the flight.
- 6.4.4** Pilots receiving instruction during a KSSA familiarization flight should be the sole manipulator of the aircraft flight controls, unless the KSSA-qualified instructor needs to intervene to maintain safety of flight.
- 6.4.5** CHs or operators may, at the CH's or operator's discretion and per the accepted or approved operating and training procedures, reduce the two initial familiarization flights to one flight if the pilot who is being familiarized has previously received familiarization on the same KSSA with another CH or operator within the past 12 calendar months. (See paragraph [6.7](#) for records.)

**6.5 Initial or Annual Flight Observations.** The training should specify that, after successfully completing all the training as outlined in the CH's or operator's specific training approved by the Administrator, each pilot should receive a KSSA flight observation, and the following should be emphasized:

**6.5.1** All pilots should have satisfactorily passed a KSSA flight observation since the beginning of the 12th calendar month before that service, within a grace period of one month before and after the due month. This observation should consist of:

- Satisfactory completion of a written or oral test that especially emphasizes preflight and cue-based weather evaluation and aeronautical decision making and B048 conditions and limitations to be observed while conducting air tour operations, and
- Satisfactory completion of a flight observation that includes at least one representative KSSA (subsequent flight observations should include different KSSA locations before repeating observations conducted at previously observed KSSA locations ).

**6.5.2** KSSA flight observations should be conducted by the Administrator or a person approved by the Administrator.

**6.5.3** Upon satisfactory completion of a KSSA flight observation, all events should be recorded on a CH- or operator-produced form accepted by the Administrator. The recording of tasks, as per the CH's or operator's FAA-approved training and FAA-accepted operating procedures, should be completed by the person conducting the flight observation. Recurrent KSSA flight observations conducted in compliance with OpSpec B048 conditions and limitations should be conducted in the same timeframe as other regulatory checks such as § 135.293. They should also allow for a grace month in accordance with § 135.301(a).

**6.6 Instructor Qualifications.** The CH's or operator's training should specify that the FAA inspector or FAA-authorized air tour operations observation pilot will conduct an initial observation of each CH's or operator's air tour operations instructor while the instructor provides training in procedures and maneuvers in accordance with this chapter. The performance of the instructor being observed should be satisfactory before the conditions and limitations are satisfied and the instructor may be accepted as an air tour operations instructor by the FAA.

**6.6.1** All pilot training and evaluation records (ground and flight) should be maintained by the holder of OpSpec/LOA B048 for the period of the pilot's employment, at the CH's or operator's principal base of operations as registered on the CH's or operator's issued OpSpec/LOA A001.

**6.7 Pilot Training and Flight Observation Documentation and Recordkeeping.**

**6.7.1** Pilot ground and flight training records pertaining to KSSA operations should reflect part 135 pilot training recordkeeping policies and procedures. Specific records for air tour training for each air tour profile should include island-specific unique climatology and

terrain influence upon the aeronautical decision making required to safely navigate the profile, KSSA entry and exit waypoints, all appropriate types of air tour radio calls, knowledge of landmarks commonly used to describe locations of flight hazards, traffic circulation patterns at KSSAs, etc. The training program should specify that KSSA training and flight observations should be documented and should include the following information:

**6.7.1.1** Ground Training:

- Name of pilot receiving training,
- Date of completion,
- Total training hours received, and
- Instructor certification.

**6.7.1.2** Initial KSSA Familiarization Flight:

- Name of pilot receiving KSSA familiarization;
- Date of flight;
- Flight time (for each familiarization flight);
- KSSA and Hawaiian island(s) flown;
- Aircraft registration number;
- Name, title, and signature of person providing the KSSA familiarization flight; and
- CH or operator certification.

**6.7.1.3** KSSA Flight Observation (CH's or Operator's Part 136 Form).

**6.7.1.3.1** A statement should be entered in the remarks section indicating the pilot is authorized to operate below 1,500 feet above the surface, in accordance with the OpSpec/LOA B048 conditions and limitations.

**6.7.1.3.2** Each CH's or operator's recordkeeping system for air tour training and flight observations must comply with the pilot recordkeeping set forth under § [135.63](#). The FAA recommends that § 91.147 air tour operators follow the same pilot training and checking recordkeeping practices as those required for part 135 CHs.

**6.7.2** All pilot and instructor training and evaluation records (ground and flight) should be maintained by the CH or operator and holder of OpSpec/LOA B048.

**6.8 Training Subjects.** Training should specify the following for all pilots conducting commercial air tour flights below 1,500 feet above the surface in the State of Hawaii in

order to remain in VMC and avoid entering IMC, as authorized through OpSpec/LOA B048 (see Table 6-1, Training Subjects and Standards).

**6.8.1** Each CH's or operator's part 136 new hire/initial/recurrent training should include training on each of the following subjects:

- Mountain flying techniques and high density altitude;
- Controlled flight into terrain (CFIT) avoidance;
- Performance planning;
- Cue-based, island-specific weather training;
- Go/no-go procedures;
- Operations inside the boundaries of a unit of the NPS under an ATMP, a VA, or an IOA;
- Hawaii commercial air tour accident review;
- KSSAs, entry and exit points and procedures to each KSSA location, radio communications protocol, CTAFs, position reports, and revisions to traffic and CTAF advisory procedures over the past year;
- Operations over water, ditching procedures appropriate to equipment being operated;
- Height velocity diagram and raw terrain descriptions (helicopter only);
- Preflight safety risk analysis and weather factors affecting operations;
- Inclement weather, IMC avoidance, escape, and recovery procedures;
- Successful transition to IFR/IMC, if inclement weather avoidance is unsuccessful followed by recovery offshore or via a published IAP to an airport/runway;
- Aircraft-specific equipment and related IFR limitations;
- Familiarization flights;
- Abnormal and emergency procedures;
- Autorotation; and
- Hover autorotation.

**Table 6-1. Recommended Training Subjects and Standards**

Module	Initial Ground Training (2 Hour Minimum)	Initial Flight Training	Recurrent Ground Training (1 Hour Minimum)	Recurrent Flight Training	Initial Flight Observations	Recurrent Flight Observations	Requalification	
							Ground	Flight
Mountain Flying Techniques	X	X	X	X**	X	X	X*	X*
Performance Planning and High Density Altitude Ops	X		X		Oral	Oral	X*	
CFIT Avoidance	X		X		Oral	Oral	X*	
Cue-Based, Island-Specific Weather Evaluation and Aeronautical Decision Making	X		X		Oral	Oral	X*	
Inclement Weather, IMC Avoidance, Escape, and Recovery Procedures	X	X	X	X	X	X	X*	X*
Go/No-Go Procedures	X		X		Oral	Oral	X*	
Familiarization Flights	X	X	X	X	X	X	X*	X*
Preflight Safety Risk Analysis and Weather Factors Affecting Operation	X		X				X*	
Operations Inside the Boundaries of a Unit of the NPS Under an ATMP, a VA, or an IOA	X	X	X	X**	X	X	X*	X*
Hawaii Commercial Air Tour Accident Review	X		X		Oral	Oral	X*	
KSSAs, Entry and Exit Points and Procedures to Each KSSA Location, Radio Communications Protocol, CTAF, and Position Reports	X	At least 1 rep site	X	X**	X At least 1 rep site	X At least 1 rep site	X*	At least 1 rep site*
Operations Over Water, Ditching Procedures Appropriate to Equipment Being Operated	X		X		Oral	Oral	X	

Module	Initial Ground Training (2 Hour Minimum)	Initial Flight Training	Recurrent Ground Training (1 Hour Minimum)	Recurrent Flight Training	Initial Flight Observations	Recurrent Flight Observations	Requalification	
							Ground	Flight
Height Velocity Diagram and Raw Terrain Descriptions (Helicopter Only)	X				Oral	Oral	X *	
Transition to IFR/IMC, if Inclement Weather Avoidance is Unsuccessful	X	X	X	X	X	X	X	X
Abnormal and Emergency Procedures	X	X	X	X	X	X	X	X
Aircraft-Specific Equipment and Related IFR Limitations	X	X	X	X	X	X	X	X
Autorotation		X		X	X	X		X
Hover Autorotation	X	X	X	X	X	X	X	X

\*\* Recurrent flight training for pilots should include, at least flight training in the procedures relative to each KSSA, except that satisfactory completion of a recurrent flight evaluation, evaluating all training elements above, conducted within the previous 12 calendar months, may be substituted for recurrent flight training.

\* Items of recurrent training that were not completed when due for requalification or eligibility should be completed within 12 calendar months of the last tour flight.

**6.9 Courseware.** The CH or operator should include and present to the Administrator, at a minimum, the training courseware to support the training listed in paragraph [6.8.1](#) above.

**6.10 Supplemental Courseware.** The CH or operator should include and present to the Administrator the following supplemental courseware, which is dependent on the geographic area and scope of operation. Supplemental courseware may vary greatly among CHs and operators depending on their specific area of operation, as applicable.

- ATC letter(s) of agreement and procedures;
- National Park Service ATMPs;
- IOA, OpSpec/LOA B057, and OpSpec/LOA B048; and
- VAs.

## Advisory Circular Feedback Form

If you find an error in this AC, have recommendations for improving it, or have suggestions for new items/subjects to be added, you may let us know by contacting the Air Transportation Division at 9-AFS-200-Correspondence@faa.gov or the Flight Standards Directives Management Officer at 9-AWA-AFB-120-Directives@faa.gov.

Subject: AC 136-4, Supplemental Information for the Creation of Operating Procedures and Pilot Training Subjects Related to OpSpec/LOA B048

Date: \_\_\_\_\_

*Please check all appropriate line items:*

An error (procedural or typographical) has been noted in paragraph \_\_\_\_\_ on page \_\_\_\_\_.

Recommend paragraph \_\_\_\_\_ on page \_\_\_\_\_ be changed as follows:

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In a future change to this AC, please cover the following subject:  
(Briefly describe what you want added.)

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Other comments:

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I would like to discuss the above. Please contact me.

Submitted by: \_\_\_\_\_

Date: \_\_\_\_\_