

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL AVIATION ADMINISTRATION

Air Traffic Organization Policy

ORDER JO 7210.67B

Effective Date: 02/14/2020

SUBJ: Policies and Procedures for Validating New/Revised Sectors/Positions in En Route and Terminal Air Traffic Facilities

- **1. Purpose of This Order.** This order provides guidance on how to request new/revised sectors/positions in FAA Air Traffic Organization (FAA-ATO) facilities.
- **2. Audience.** FAA-ATO Facility, District, and General Managers, Senior FAA Management, and FAA personnel who support requests for new/revised sectors/positions in the ATO-Operations Service Centers and FAA-ATO Headquarters.
- **3.** Where Can I Find This Order? This order is available on the MyFAA employee website: https://employees.faa.gov/tools_resources/orders_notices/.
- **4. Cancellation.** This order replaces the ATO Policy Memo titled, "Policies and Procedures for Validating New/Revised Sectors/Positions in En Route and Terminal Air Traffic Facilities," 7210.67A, effective March 12, 2018.
- **5. Background.** FAA Order 7210.67A, Policies and Procedures for Validating New and/or Revised Sectors/Positions in En Route and Terminal Air Traffic Facilities, previously outlined duties that pertained to Terminal District Managers, among others. Due to the Air Traffic Services Realignment, updates need to be made to reflect these changes. The purpose of this document is not intended to be used for determining the number of positions for controller training, certification purposes, and/or affecting training progression requirements, but only for the administrative function for adding/revising a sector/position. The goal is to provide FAA Air Traffic facilities a standardized process for requesting new and/or revised sectors/positions and any associated assets. This guidance promotes consistency in the approval process and gives facilities a blueprint for submission standards.

6. Compliance Requirements.

- **a.** Requests for new and/or revised sectors/positions must comply with the requirements in this order if *any* of the following conditions exist:
 - (1) There is a need to add or change a position type and/or function.
- (2) If additional FAA equipment and/or Facilities and Equipment (F&E) work is needed (i.e.; radar displays, radio frequencies, communication switches, wind indicators, IDS, position/console work, etc.).
 - (a) Create a Needs Assessment Program (NAP) if the request requires new equipment

Distribution: Electronic Initiated By: AJT-2

and/or F&E work to an existing facility. NAP submissions ensure that the appropriate equipment is documented for purchase and installation. (*Information on how to create a NAP is located under section "8(i)" of this order.*)

- (b) Coordinate with the appropriate Spectrum Engineering Team, AJW-1C5, AJW-1C6, or AJW-1C7 if needed.
- **b.** If a request is part of, or associated with, a Metroplex, Facility Realignment or an Airspace Redesign type effort, and the approved justification of that study meets the requirements in Paragraph 8 in this order, that documentation can be used in lieu of the requirements in this order.
- **c.** Special Event Positions (SEP) Positions that are necessary on an "as needed" basis (i.e.; NASCAR, Super Bowl, Olympics, Fly-Ins, Airshows, etc.)
 - (1) New SEP Sector/Position The facility must follow the requirements contained in this order.
 - (2) For Existing SEP Sector/Positions.
- (a) Submit a memo to the Technical Advisory Group, AJT-22, to have the sector/position re-activated/de-activated, as needed.
- (b) If a facility wants to revise an existing SEP sector/position, follow the requirements contained in this order.
- **d.** Requests to change a position name/ID/type, Refer to section 7, e, 2 of this order for guidance.

7. Roles and Responsibilities.

a. Air Traffic Manager.

(1) Prepare Staff Study IAW Paragraph 8 of this order.

NOTE: Each affected facility must comply with requirements of this order and coordinate the effort with their chain of command.

- (2) Prepare a Memo of Endorsement to route the Staff Study to all approving officials for concurrence or approval. Due to naming all the approving officials in the memo, only one submission is required to transmit the request through the approval process. A sample memo appears in Appendix D of this order.
 - (a) Address the memorandum to the Director of Operations-Headquarters, AJT-2.
- (b) Include on the "THRU" line, the names of all the appropriate concurring officials, which may involve more than one District and/or Service Area.

(3) Submit the Memo of Endorsement and the Staff Study package to the appropriate General Manager.

NOTE: The Service Center, via the PRG Office, normally offers support to the facility in preparing the final draft of the Staff Study and any related documents.

b. General Manager. Validate and concur or non-concur with the staff study. If concurred, forward the request package to the PRG Office within the appropriate Service Area. If the decision is non-concur, inform the Facility Manager with a written explanation.

c. ServiceArea Planning and Requirements Office (PRG)

- (1) Coordinate the facility request throughout the other Service Center groups including OSG, QCG, BSG, and ASG to validate content, assumptions, and conclusions. Add any comments to the endorsement.
 - (2) Coordinate the request to the appropriate Director of Operations-Service Area.
- (a) If the Director concurs, indicate so by endorsing the request. Forward the package to the Director of Operations-Headquarters, AJT-2, for action.
- (b) If the Director does not concur, advise the General Manager with a written explanation for the non-concurrence.

d. FAA Headquarters.

- (1) AJT-2 will forward the package to AJG-P24. AJG-P24 will review and analyze the request and prepare a written briefing for the Director of Operations-Headquarters, AJT-2.
- (2) The Director of Operations-Headquarters, AJT-2 will notify the appropriate Director of Operations-Service Area and AJG-P24, in writing, of the final disposition.
- **e. Affected Facilities.** If the Director of Operations-Headquarters, AJT-2, approves the request, the facility is responsible for the following actions:
 - (1) Amend local facility directives, as applicable.
- (2) Coordinate any operational position name/ID/type changes to the appropriate databases (i.e.: Cru-X/Art, Staffing Workbook, Business Objects, Operational Position MGT System [OPIS]) with Management Services, Technical Requirements and Forecasting Group, AJG-P24, using the following guidance:
- (a) Operational Position Names Operational Position Names are determined by the facility.
- (b) Operational Position Identifiers (ID) Position Identifiers contain a maximum of five letters and/or numbers (IAW FAA Order JO 7210.3, Facility Operation and Administration, Paragraph 4-6-6, FAA Form 7230-10, Position Log). To comply with Accident/Incident

packages, training records and other official FAA documents, Position Identification designators cannot be reused. Facilities that utilize the National Airspace System (NAS) Scope, Keyboard, and dial code identifiers as the Position ID, must append an alpha (a, b, c, etc.) and/or numeric (1,2,3, etc.) character to the end of a re-used Position ID, and increment this value anytime that Position ID is re-used. This additional character must not make the new Position ID exceed 5 characters *Example: New York TRACON uses dial codes (a current Position ID is 403, 1st change it would become 403a, 2nd change it would become 403b, etc.)*. Position IDs are the official identification of an operational position. Facilities cannot change Position IDs unless they justify the need through the provisions of this order.

- (c) Operational Position Types Position Types contain a maximum of two letters (IAW FAA Order Facility Operation and Administration, JO 7210.3, Paragraph 4-6-6, c, 3, FAA Form 7230-10, Position Log). The Position Type should best align with the facility SOP for the new or revised position/sector. If the position will encompass multiple position types, the position shall be assigned the highest type function. Facilities requesting to change Position Types must follow the provisions of this order.
- (3) Define an implementation schedule, any necessary training/coordination requirements, and staffing requirements to minimize operational disruptions.
- (4) Evaluate changes after implementation. Utilize the metrics developed in the staff study to validate the project to ensure the anticipated benefits have been gained.
- **8. Staff Study Requirements.** (The size, cost, and complexity of the project will dictate the methods used for the Staff Study).
- **a. Air Traffic Managers (ATMs).** ATMs will form a study team and formally document the analysis, conclusions, and recommendations concerning the request.
- **b. Staff Study Team.** A cross-section of personnel is recommended for use on the study team that should include management, staff, controllers, union representation, traffic management, and Technical Operations, as well as FAST personnel and NAS stakeholders (when practical and applicable). Facilities with limited staffing will be required to prepare the same documentation as outlined in this directive; however, staff participants may be replaced/supplemented by personnel from their respective district, service area, or if feasible, a nearby facility.

NOTE: Identify as early as possible in the planning process, desired changes in sectors/positions so that existing requirements for Facilities and Equipment and Staffing Authorization adjustments can be addressed.

NOTE: Refer to Appendices A and B for guidance and ideas on defining the need for change, and Appendix C for best practices for preparing a staffing study.

- **c. Staff Study Components.** The Staff Study must include the following:
 - (1) Executive Summary

- (2) Statement of the Problem
- (3) Alternatives Considered
- (4) Justification for the requested New/Revised Sector/Position
- (5) Business Case for the Requested New/Revised Sector/Position
- (6) Facility's NAP Submission Information
- (7) Safety Risk Management
- (8) Identify potential impact to any training progression requirements due to a possible change in the number of operational positions.
- **d.** Executive Summary. The one-page Executive Summary must summarize the problem, the alternatives considered, and the justification for the request.
 - **e. Statement of the Problem.** This is a formal statement that must:
 - (1) Describe the current situation.
- (2) Identify and document the problem and any related issues, while explaining how the problem affects productivity, capacity, and/or safety.
- (3) Where feasible, document the request with quantifiable data; i.e., traffic volume, loss of separation, runway incursions, frequency congestion, etc.
- (4) State any known issues about the problem; i.e., any changes in traffic volume, the existence of a flight school, military operations, or unique topographical features. Describe if the problem exists 24 hours a day or only during certain time-periods.
- (5) Describe the scope of the problem; i.e., if it is limited to the facility or also affects other facilities.

f. Alternatives Considered.

- (1) List at least three alternative solutions. For example, maintaining the status quo, adopting new equipment, or developing new procedures.
- (2) Identify the types of analysis used to evaluate the alternatives based on the minimum resources required; i.e., expert judgment, statistical analysis, human-in-the-loop testing to get pilot/controller input, etc.
- (3) Establish and define metrics that will serve as the basis for comparing alternative solutions.
- (4) For each alternative, discuss the pros and cons explaining how each alternative would solve the problem. Consider, if appropriate, the following factors:

- (a) Safety (loss of separation, runway incursions, etc.)
- (b) Documented results of models, if any are used

When using models:

- i. Use technical judgment in selecting an appropriate set of scenarios and simulations.
- ii. Adapt the model to the specific facility, site, sector, and/or position under study to address specific constraints such as miles-in-trail, altitude restrictions, or off-gate performance.
- iii. Ensure the analysis is valid even if the assumptions change (i.e., traffic growth, aircraft types, equipment, and infrastructure). Assumptions should be kept to a minimum.
 - (c) Controller operations (workload and repeated clearances)
 - (d) Controller staffing (additional hires and overtime)
- (e) Frequency issues (congestion, missed radio transmissions, and unanswered interphone calls)
- (f) Traffic (traffic count, position/sector traffic loads, delays, sector overload, aircraft holding, and timeliness of services)
 - (g) Operational efficiency
 - (h) Costs to airlines and users; gather customer input for this.
 - (i) Overall cost to FAA:
- i. Staff resources (additional controllers and/or supervisors to staff/supervise the new/revised position/sector)
 - ii. Facility and Equipment (F&E) expenses.
 - iii. Operation and Maintenance (O&M) installation and maintenance expenses.
 - iv. Overtime for development and operation (estimated hours)
 - v. Training (hours per person)
 - (j) Frequency Availability

NOTE: At the planning phase, the ATM/Staff Study Team Lead (SSTL) shall request a preliminary frequency assessment to the appropriate Spectrum Engineering Team, AJW-1C5, AJW-1C6, or AJW-1C7. In certain congested areas, frequency availability will be an

important factor in the viability of a new and/or revised sector/position. Once approved, the ATM shall request an actual frequency transmit authorization.

- (k) Resource Constraints
- (1) Timeline of Events

g. Justification for the Requested New/Revised Sector/Position.

- (1) Summarize the benefits of the selected alternative and acknowledge any cons.
- (2) Assess if the issue can be addressed by changing a procedure or operation that would be less intrusive and/or costly

NOTE: If the scope of the problem and its solution is limited to a single facility, that facility is usually responsible for examining and solving the problem. If, however, the scope extends beyond the facility's boundaries or if the change could affect the operations of other facilities, the appropriate District(s) and Service Area(s) would be responsible for facilitating a solution. Nevertheless, when an issue crosses facility/district/service area boundaries, it should be resolved at the lowest management level before being elevated to senior management.

(3) Confirm that existing facility assets are being used efficiently. If any existing position/sector has been used an average of 1 hour per day (or less) over the previous fiscal year(s), the staff study must explain why that position/sector was not redistributed to meet the new position/sector requirement.

h. Business Case for the Requested New/Revised Sector/Position.

- (1) Provide a Cost-Benefits Analysis outlining the anticipated financial gains/losses.
- (2) Document the rationale and sources used to derive such benefits.
- (3) Describe any anticipated intangible gains, such as improved customer relations, a more manageable controller workload, etc.

i. Facility's Needs Assessment Program (NAP) Submission Information.

(1) If the facility's request requires any equipment and/or F&E type work, the facility will prepare a NAP submission to identify this need. The associated NAP information (identification number or project title/description) will need to be included in the staff study. This will ensure appropriate coordination with procurement for the project.

NOTE: For information on how to make a NAP submission, consult the User Guide: https://cwp.faa.gov/cwpguide/default.htm. Information about NAP is in the "Glossary" tab on the left side of the Corporate Work Plan (CWP) Guide page.

(2) If the request is part of a facility replacement or facility realignment, a NAP submission is not necessary, as the request for new equipment and/or facilities and equipment work would be addressed in the associated Requirements Document Workbook process.

- (3) Indicate in the study if the request does not require any equipment and/or F&E type work.
- **9. Safety Risk Management.** The change proponent must conduct a Safety Analysis using the Safety Risk Management (SRM) process to determine any potential safety risks introduced to the NAS.
- **a.** If no hazards or effects are identified in the SRM process, the change proponent must write a Safety Risk Management Document that explains the rationale supporting their determination that the safety of the NAS will not be affected.
- **b.** If any hazards or effects are identified, an SRM Panel must be convened to attempt to mitigate the risk. An SRMD must be prepared and risk accepted before the change can be implemented.

NOTE: Guidance on the ATO's Safety Risk Management System is in the current version of the ATO Safety Management System Manual.

Jeffrey U. Vincent Vice President (VP) Air Traffic Services 02/14/2020 JO 7210.67B Appendix A

Appendix A. Factors/Methods Considered to Determine Need for New/Revised Sectors/Positions in Air Traffic Facilities

Recognizing Traffic Changes

- 1. Sector/position consistently operating beyond normal volume loads
- 2. Significant/increasing delays incurred by customers
- **3.** Significant/increasing restrictions needed to preclude saturation
- 4. Sector/Position complexity
- **5.** Valid user/controller input

Causes

- 1. Permanent air carrier schedulechanges
- 2. Customer's operating equipment
- **3.** Special Use Airspace (SUA)
- **4.** NAS infrastructure changes
- **5.** NAS procedural changes
- **6.** Adjacent facility issues

Methodology for Validation

- 1. Recognize the problem—issues may come from controllers, customers, and/or other facilities.
- **2.** Determine the need for further evaluation—decide if the problem is of short duration caused by a special event, weather, and/or temporary equipment/personnel issues.
- **3.** If further evaluation is needed, form a team at the lowest level (Supervisor, CPC, staff specialist, and NATCA). At lower density facilities, the manager may be involved in initial evaluation.
 - **4.** Seek internal solutions first. Coordinate with adjacent facilities if needed.
- **5.** Have the team prepare an informal preliminary report for presentation to the appropriate facility office. Modeling, when available, should be considered. At lower density facilities, the manager may discuss with a District/Service Area AT Office.
- **6.** The responsible facility office will either concur with the preliminary report or present suggestions to the evaluation team for further consideration/input prior to formalizing the plan.

02/14/2020 JO 7210.67B Appendix A

7. The responsible office shall formalize the plan and forward to the Facility Manager for review. Coordinate with and include user groups in the process.

- **8.** The Facility Manager shall ensure the validity of the plan and forward to the General Manager.
- **9.** The General Manager shall thoroughly review the request, validate the information, and, if they concur, formalize the request for presentation to FAA Headquarters. If they do not concur, provide a written explanation to the ATM.

Goals of Re-Sectorization

- 1. Increase efficiency
- 2. Reduce delays
- 3. Maintain/increase safety
- **4.** Increase predictability

02/14/2020 JO 7210.67B Appendix B

Appendix B. Questions for ATM to Consider for Resolving an Issue Prior to Requesting Involvement of Other Facilities

It is usually preferable to resolve operational issues within your facility. If it becomes necessary to involve other facilities, consider the following questions to be sure that you are choosing the most cost-effective option:

- Have you looked internally to solve traffic issues?
- Have you looked internally for other ways to free up equipment?
- Have you looked at any equipment issues that may have contributed to the facility's problem (for example, frequency problems/limitations, etc.)?
- Have you considered temporary Traffic Management Initiatives that minimize impact to the stakeholders, e.g., miles in-trail, release times, or reroutes to mitigate an overloaded sector/position?
- Have you discussed options with the stakeholders? Has Technical Operations and/or FAST been consulted?
 - Is staffing an issue?
 - Have you considered re-stratifying sectors/positions to balance workload?

02/14/2020 JO 7210.67B Appendix C

Appendix C. Recommended Practices for Preparing Staff Study

When preparing the staff study, follow these recommended practices:

- Look internally to resolve sector/position issues first (change procedures, airspace, or operations, etc.).
 - Remember your audience.
 - Start with the problem.
 - Do not start out with the desired solution.
 - Avoid repetition.
 - Use Plain Language principles.
 - Keep it simple.
 - Avoid FAA jargon and overly technical explanations.
 - Define FAA acronyms.
- After the first use and definition of an acronym, the acronym may be used again without definition.
 - Consider adding an acronym Appendix.
 - Use active verbs.
 - Minimize the use of passive verbs.
 - Keep sentences short.
- Consult the "My FAA" website homepage (https://my.faa.gov), under the "Tools and Resources" section for guidance in "Branding and Writing."
- Work with your Service Area's Requirements Office to define any Facilities and Equipment requirements.
- Work with Operations Support (airspace and procedural issues), as well as, Technical Operations and FAST.
 - Consider all alternatives (including inaction).
 - Document FAA/user costs and benefits.
 - Include operational analysis information, when possible.
 - Back up statements with verifiable data, when data is available.

02/14/2020 JO 7210.67B Appendix D

Appendix D. Sample of Memo of Endorsement: Request for New/Revised Sectors/Positions

Subject: ACTION – Request for New/Revised Sector/Position in an Existing Air Traffic

Facility

To: Director of Operations-Headquarters, AJT-2

Through: General Manager, XXXXXX District, Planning and Requirements Group (PRG),

Director, Air Traffic Operations, XXXXXX Service Area, AJT-XX

From: Air Traffic Manager, XXX ATCT/ARTCC/TRACON, AJE/T-X

XYZ ATCT/TRACON/ARTCC has identified a need for two new/revised operational sectors/positions in support of an additional runway/expanded operation/airspace change at XYZ airport/facility.

The attached staff study provides supporting documentation, modeling data, and appendices that detail the need and justification for this request/action.

The study contains:

Topic		Page
Signature Page		1
Table	of Contents	
a.	Executive Summary	3
b.	Statement of the Problem	5
c.	Alternative Solutions	7
d.	Operational Justification for the Requested New/Revised Sector/Position	13
e.	Business Case for the Requested New/Revised Sector/Position15	
f.	Facility's Needs Assessment Program (NAP) Submission Information	17
g.	Safety Risk Management Documentation (SRMD)	20

If you have any questions regarding this request, please contact (name, office, at phone number).

Attachments: Staff Study/SRM Documents