

# **AERONAUTICAL CHARTING MEETING**

## **Instrument Procedures Group**

**Meeting 19-02 – October 2019**

### **RECOMMENDATION DOCUMENT**

**FAA Control # 19-02-345**

**Subject: Use of P-NOTAMS on SID/ODPs and STARs**

#### **Background/Discussion:**

Frequently, it becomes necessary to make an amendment to a Standard Instrument Departure (SID) or Standard Terminal Arrival Route (STAR). For example, a recent metroplex initiative resulted in a new STAR with a published altitude constraint below the floor of the Class B airspace. A temporary NOTAM was issued to raise the altitude constraint above the floor of Class B to meet the requirement of the Code of Federal Regulation for operations within Class B airspace (ref 14 CFR §91.131 Operations in Class B airspace).

Temporary NOTAMS do not result in charting or nav-database changes to SIDs, ODPs, or STARs. Air traffic clearances are issued with the belief that pilots will reviewed the T-NOTAMS, have identified these changes, and made changes to the RNAV system to comply with the changes. Experience has shown that this is not the case and that pilot deviations frequently occur when T-NOTAMS change speed or altitude constraints.

#### **Recommendations:**

NBAA requests that FAA develop criteria for expanding the use P-NOTAMS to correct errors on SIDs and STARs.

#### **Comments:**

This request affects FAA Order 8260.19, Flight Procedures and Airspace

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**Date:** 4/25/19

**Initial Discussion Meeting 19-02:** Rich Boll, NBAA, briefed the new issue with a proposal to apply the P-NOTAM process on SIDs and STARs. John Bordy, FAA Flight Procedures and Airspace Group, advised this idea was presented at US-IFPP 19-02, and accepted as part of the effort to rework the abbreviated amendment process. John adding there will be separate working groups for this. Valerie Watson, FAA/AJV-A25, suggested if using P-NOTAMS then perhaps the number should be from the procedure name and simply use an amendment number. Jay Gaumer, FAA/ZKC-530A, said STARs are owned by the centers, and they maintain the procedures. John said the overall intent is to reduce the number of NOTAMS, and allowing the use of P-NOTAMS would shorten length of time to one cycle. Jay added typically it can take 18-24 months to make changes to a STAR. John said the WG formed will include PBN and Air Traffic. Jay and Jeff Gringas, Delta Airlines wish to be included in the WG.

### **Action Items:**

- FAA Flight Procedures and Airspace Group will work the issue

**Status:** Item open

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**Meeting 20-02:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the [slide](#). Jeff said this issue was already discussed earlier as part of issue 16-01-325, noting the challenges of working this for SIDs and STARs. This is an ongoing discussion, with an emphasis on avoiding unintended consequences. FPAG is awaiting feedback on the issue from Aeronautical Information Services.

### **Action Items:**

- Flight Procedures and Airspace Group will continue to work the issue and report status

**Status:** Item open

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**Meeting 21-01:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the [slide](#). Sue Walker, FPAG, has been working the issue in conjunction with Pat Mulqueen, FAA Aeronautical Information Services. Pat briefed there are no P-NOTAMs on SIDs and STARs. The US NOTAM Office is now part of AJV-A, and an effort is under way to reduce the number of NOTAMs in the NAS, currently with over 40,000. When this issue was brought to Pat, the thought was it would be counterproductive to increase the number of NOTAMs in the system by adding these. Pat feels the better way to address SIDs is with the abbreviated amendment process, as is already the case with STARs, which is working well with small changes. Pat suggests a similar process for departures, adding AJV-A does not want to go forward with an expanded P-NOTAM process.

Rich Boll, NBAA, restated the intent of the original issue was to get changes on SIDs and STARs out faster than the 18-24 month amendment process. Rich discussed a new STAR into SFO where an altitude was published and coded, then had to be raised due to being below the floor of Class B airspace. A NOTAM was issued to raise the altitude back to compliance, but that did not change charting or coding, and while ATC expected the pilots to be familiar with the NOTAM, many were not. Trying to get a procedure amended is difficult and can take 18 months or longer, and the interest is to have a faster method to update procedures. NBAA felt P-NOTAMs are for chart changes, and once the chart is changed the NOTAM could be cancelled. Rich asked Pat if an abbreviated amendment process would fix the issue. Pat said on the STAR at SFO, a T-NOTAM was issued, and was aware the NOTAM was missed by some pilots. Pat feels the way forward is the abbreviated amendment process, even though AJV has a heavy workload. If the criteria is defined, especially if no flight inspection is required, AJV can typically amend the procedure forms for the next available chart date. The problem is when these procedures are amended, major changes are usually requested requiring full amendments. Pat added sometimes Flight Inspection can do a table-top review rather than fly the procedure. Pat and Rich agreed too many NOTAMs is a safety issue, and having a vehicle for abbreviated amendments would help reduce these.

The abbreviated amendment process for STARs is in Order 8260.19. If there is a safety issue, AJV creates a T-NOTAM. Sue Walker, FPAG, said the NOTAM issue is a high priority issue and took an action item to work with Pat on defining what could be allowed for abbreviated amendments on SIDs. Pat said QC cannot approve items for abbreviated amendments that are not specifically listed, so they need to see if the list can be expanded. Items not requiring flight inspection need to be listed for an abbreviated process, and AJV is limited unless this is accomplished. Pat suggested additional items for STARs could also be addressed. TJ Nichols, FPAG, added a P-NOTAM does accomplish a chart change, but does not result in updates to navigation databases. The intent is to accomplish a chart update for a quick amendment in the shortest amount of time, but that can possibly result in a database mismatch. Rich pointed out this issue is related to and should be worked with open issue 16-01-325. John Barry, FAA Aircraft Certification Service, added a major point is ensuring the database is updated simultaneously. Pat suggested the way forward is to update the forms, resulting in the chart change, and using those forms on the coordination website as the information source for database updates.

#### **Action Items:**

- Flight Procedures and Airspace Group will work with AJV-A to define parameters for an abbreviated amendment process for SIDs and ODPs

**Status:** Item open

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**Meeting 21-02: 19-02-345: Use of P-NOTAMS on SID/ODPs and STARs and 16-01-325: Priority of Terminal Procedure Amendments:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issues together from the [slides](#), since they will have the same solution. Both recommendations relate to P-NOTAM process revision issues. Pat Mulqueen, FAA Instrument Flight Procedures Group (AJV-400), briefed there is already an abbreviated amendment process in Orders 8260.46 (for SIDs) and 8260.3 (for STARs), but what is not obvious is they are incrementally numbered with each revision, as they would be for full amendments. AJV-A does not want to add P-NOTAMS into the system for SIDs and STARs. Sue Walker, FPAG, briefed there is ongoing discussion on priorities and also what requires an abbreviated or full amendment, adding more work is needed. Rich Boll, NBAA, stated the original issues were raised because there are large numbers of NOTAMS in the system that affect procedures, issued as 224-day T-NOTAMS, then re-issued rather than being resolved. This information is not in the FMS database possibly leading pilots to miss the information. Rich does not care if abbreviated amendments or P-NOTAMS are used, but believes the charts and/or databases need to be updated. He added that no matter how well procedures are quality checked, problems arise once they are flown, and those problems need to be addressed more quickly. Rich asked what would be a best practice once these problems are identified under existing orders. Pat indicated he understood the point, and added that if the issue is one of safety, it should be fixed with an abbreviated amendment as soon as possible. Pat agrees if the T-NOTAM has been out for 224 days the change needs to be made permanent, but does not feel a P-NOTAM is the best method. Bennie Hutto, NATCA, said the orders allow some things, like raising an altitude on an abbreviated amendment, but not lowering one, as that would require a full amendment. Bennie questioned if we could add some items to the abbreviated process, since it takes a long time for some simple amendments. Pat agreed, but added some things that look simple actually are not, and Flight Inspection can be required due to certain changes. AJV-A needs room in their schedule for high-

priority projects, and scheduling is always an issue for them. Mike Stromberg, UPS, said if anything related to safety of flight is being placed on a NOTAM, it needs to be in a database and charted as soon as possible. Rich agreed with Mike, and said RD 19-02-345 was submitted to see if the P-NOTAM process, as used for approaches, could be utilized for simple 'pen and ink' changes rather than using the 224-day T-NOTAM process. He stated that since it appears that process will not work, NBAA would suggest closing this issue, but leaving the more important RD 16-01-325 issue open. Rich suggested possibly another avenue, such as a 'we made a mistake' process for some cases (such as an incorrectly documented and charted altitude) that could be corrected in the following chart cycle. Pat said there is a similar process for new metroplex system errors to correct identified issues on the prior chart cycle. Sue said Flight Standards would help revise anything necessary to expedite the process of changes like this. Pat said we should refine the abbreviated amendment process to make simple changes, and feels that should be easy to do. Jeff summarized the discussion that the attendees felt the Agency should work on a process to fix errors quickly. Bennie said the metroplex post-implementation process discussed earlier was not originally designed to fix identified problems, but it is used that way. Joshua Fenwick, Garmin, said he supports Rich's proposal for the change and Garmin feels the same about the issue, and prioritizing corrections for coordinates or altitudes is important. The group consensus was to close RD 19-02-345. RD 16-02-325 will remain open, with an effort to prioritize quicker corrections for high-interest problems. Valerie Watson, FAA Charting Products Integration Team (AJV-A250), said there used to be a chart correction process to correct chart errors, which probably would not work now, but there should be an error correction process. Dan Wacker, FPAG, added we should ensure the procedure is also looked at for criteria changes during an abbreviated process, but Pat said they do look at safety cases at the same time, and will update the procedure if any are identified.

**Actions:** Close RD 19-02-345. RD 16-02-325 will remain open. The Agency will continue to work toward an abbreviated amendment process to prioritize quicker corrections for significant issues with SIDs and STARs.

**Status:** Item 19-02-345 closed

**Status:** Item 16-01-325 open

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