



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

Aviation Safety

800 Independence Ave  
Washington, DC 20591

Captain Ronald Renk  
CO-Chairman, Performance-based Operations  
Aviation Rulemaking Committee (PARC)  
United Airlines  
7401 E Martin Luther King Boulevard,  
Denver, CO 80207  
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Dear Captain Renk:

I would like to thank the Performance-based Operations Aviation Rulemaking Committee (PARC) for the recommendations report dated August 26, 2021. We commend the PARC members who provided their time and resources to develop, review, and approve the recommendations. The industry-wide cooperation and engagement achieved through your leadership was a necessary enabler to produce the innovative set of recommendations presented in the recommendation report.

The Federal Aviation Administration (FAA) has reviewed the recommendation to change Established on RNP (EoR) design criteria. Currently, instrument approach procedures used for EoR operations must be designed to provide unique initial or intermediate approach segments for at least 50 seconds. This design allows air traffic controllers sufficient time to identify and intervene in the event of an incorrect approach selection by a participating aircraft. FAA Order 8260.3E paragraph 15-5-3 presently states that this unique path requirement must be maintained until crossing the first Final Approach Course (FAC). Accordingly, paragraph 15-5-3 will be amended to remove the requirement to maintain a unique path “until crossing the first FAC.” The requirement for a unique path of at least 50 seconds will still exist, but the unique path will no longer be required to be maintained until crossing the first FAC. This change will allow greater design flexibility for instrument approach procedures used in EoR operations. Flight Standards anticipates that the revised criteria will be published in April 2023.

The FAA also reviewed the recommendations from the Pilot/Controller Phraseology and Systems Integration (PCPSI) Phraseology Harmonization Subgroup. As mentioned in the subgroup’s final report, additional research, which may include human-in-the-loop (HITL) simulations, will be required in order to determine the feasibility of these recommendations. FAA Flight Standards will work with the Air Traffic Organization to validate the effectiveness and operational suitability of these recommendations prior to accepting the recommendations and putting them into practice.

When the FAA decides to make the recommendation report and the related documents publicly available, all documents will be placed on the FAA Committee Database website at: [http://www.faa.gov/regulations\\_policies/rulemaking/committees/documents](http://www.faa.gov/regulations_policies/rulemaking/committees/documents).

Sincerely,

David H. Boulter  
Executive Director, Flight Standards Service