

# AERONAUTICAL CHARTING FORUM

## Instrument Procedures Group

Meeting 15-01 – April 28, 2015

### RECOMMENDATION DOCUMENT

FAA Control # 15-01-320

**Subject:** Common Sounding Fix Names

**Background/Discussion:** Complaints have been made that common spelled or common sounding navigation fix names are being used in terminal areas that are causing confusion. Efforts have been made to enact change, but local facilities sometimes do not take notice because they have created the names and like them. In some cases, it does not seem to be a problem to an ATC controller, but quite often it is a struggle for the crew to get the correct spelling into a FMS in a timely manner. Recently, an airline crew was on radar vectors at KATL and was cleared direct SHELE to resume the ONYON arrival, but instead went direct SCHEL because it was on the assigned approach. At KDFW, multiple complaints of too many “Navy” fixes have been common. TRYTN SID has “NAVYE”, SEEVER STAR has fix “NAAVY”, and CQY8 STAR fix named “NAVYS”. All in the DFW terminal area. Additionally, there is another “NAVYY” in the KPHL area. Attempts were made at local level to fix the issue, however the fixes are popular in the ATC environment. While certain names and “string of names” are popular in some terminal areas, they can cause cockpit confusion and FMS entry error, or a deviation in track.

### **Recommendations:**

1. APA acknowledges the vast amount of fixes in the NAS and current efforts to manage them. However, we would like to appeal to the group these decisions and try to find a way to resolve these occurrences when attempting to get them changed at a local level has failed. Perhaps the FAA Air Traffic Operations Oversight Division, or other FAA organizations responsible for addressing flight/air traffic safety, can assess these conditions and step in to resolve our concerns. Also, recommend a process be established to alert ATC facilities when these conditions are noted and require action.

2. Order JO 7400.2K, paragraph 3-3-4d, currently states: *“Five-letter names that are assigned by the Mission Support, Terminal Procedures and Charting Group and major commands will be coordinated with the associated ARTCC to preclude similar sounding fix names.”* We do not believe this paragraph is explicit enough to prevent similar sounding fix names from being in close proximity to one another. This paragraph should be expanded to include language similar to what is in paragraph 3-3-3b, regarding Navaid naming and placement, which states: *“The name must not sound similar to an existing NAVAID/fix location name within the originating ARTCC’s area, the adjacent ARTCC’s area, or within a 300 NM radius from the NAVAID involved.”* ATC facilities following this guidance for “fix naming” would prevent situations shown in the examples from happening.

### **Comments:**

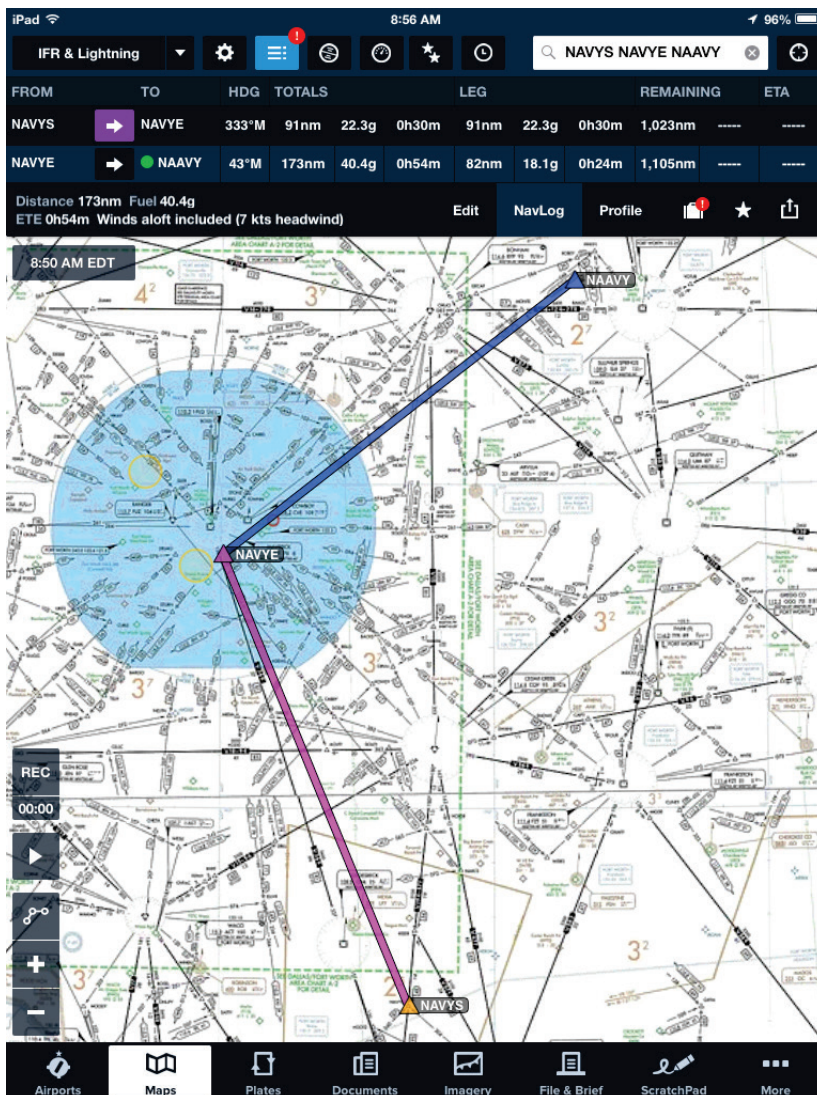
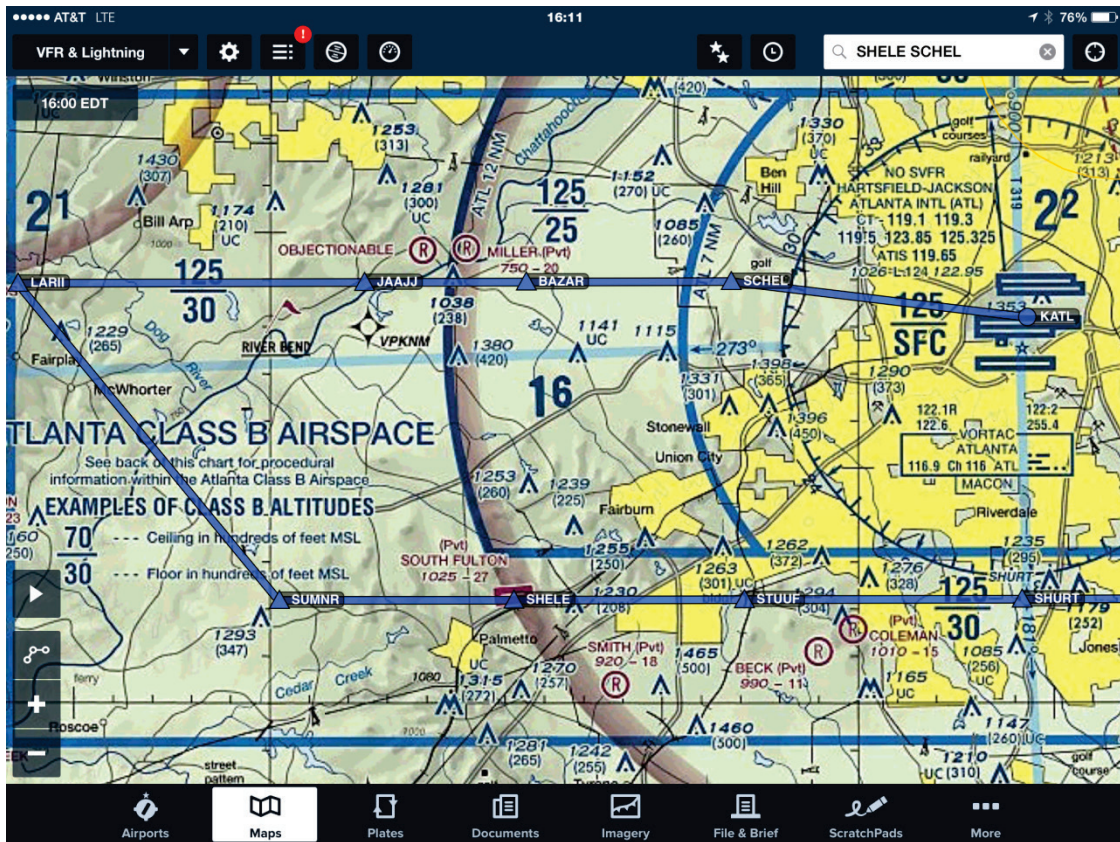
**Submitted by:** Lev Prichard

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**Date:** 8APR15



**Initial Discussion – MEETING 15-01:** Lev Prichard, Allied Pilots Association, briefed ([View](#)) some examples of common sounding fix names in close geographic proximity, showing as examples three similar names in the Dallas area and two similar names in Atlanta. He said that when he questioned ATC about the three in Dallas, he was informed that the Navy veterans at the facility liked them. Lev acknowledged the massive number of fixes in the NAS and that finding all those with similar sounding names at inception is difficult, but there should be a mechanism to address when similar/confusing names/spellings are identified. A point was made that in the Dallas example, since the fixes are on different types of procedures, there should be no confusion. A spirited group discussion followed with pilot input that your procedure is often changed by ATC requiring a last minute data input into the navigation system during high work load periods, which is problematic if there are similar sounding/spelled fixes in close proximity, no matter what type of procedure the fix is tied to. A question was asked about when the aircraft is cleared to a new fix, shouldn't that fix be on the drop down list in the FMS (no confusion possible) since only one procedure is loaded in the FMS? Ted Thompson, Jeppesen, brought up the precedence of the Cali disaster with an airliner cleared to similar sounding named fix which put them into a mountain, so there is a foreseeable consequence. Gary Fiske, AJV-82, pointed out that when that procedure was designed in the days before FMS databases, aircraft could not have navigated to the wrong NAVAID/fix (not in conventional reception range), but conceded that we are in a new era. Further discussion ensued regarding how the aircraft's geographic position makes an easy cross check for the pilot and that even if the name is similar, the relative distance should indicate a problem. Rich Boll, NBAA, said he has noticed ATC issuing named fixes/WP's instead of headings for weather deviations which has pilots entering points not on their original flight plans. Lev proposed a solution of developing a process to alert the facility and require action, since there currently is not one. Tom Schneider, AFS-420, suggested an addition to Order JO 7400.2K, adding guidance to what is currently in paragraph 3-3-3d, for NAVAIDS, looking for similar sounding names within 300 NM, which prompted more group discussion. Mike Wallin, NFDC, said that when NFDC gets a name request, they do a search and if exact spelling is in use anywhere they deny. If spelled differently (slightly), he has no way of knowing whether a fix with a similar sounding name is located in close geographic proximity. Mike said the local facilities should be cognizant of their own airspace, identify potential problem fix names, and address the issue in the interest of safety. Gary took an IOU to address the specific fix name issues at Dallas and Atlanta, and if any other very specific obviously problematic issues exist, bring them to his attention. Tom mentioned the NASA reporting system and the Aviation Safety (AVS), Air Traffic Operations Safety Oversight Division, which visits facilities, could address these circumstances too. Tom again mentioned Order JO 7400.2 existing language (policy guidance), inquiring if it can be strengthened, and is there a searchable mileage distance to scan for similarities. Mike said he is not sure who is the OPR in NDRC for that item but will take the IOU to research, and if any committees exist will join.

**Status:** Gary took an IOU to address the specific fix name issues at Dallas and Atlanta. Mike will take the IOU to research. **Item open:** AJV-8 (Gary Fiske)/ NFDC (Mike Wallin)

*Editor's note: Later in the day Mike Wallin added that he had obtained draft language for the Order JO 7400.2, regarding similar sounding fix names, and there is proposed text that will read: "Fixes, WPs and LOMs are developed by Air Traffic, terminal products, DOD and third party developers and must not sound similar to existing fixes, WPs or NAVAIDs named within the originating ARTCC area, the adjacent ARTCC area, or within 300 NM of each location..."*

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**MEETING 15-02:** Gary Fiske, AJV-82, discussed changes in the works concerning a number of previously identified similar sounding fix names in close geographic proximity, giving dates when changes will occur. NFDC already has proposed changes to guidance language in FAA Order 7400.2, (a copy is in the minutes of ACF 15-01). Item will remain open for one more cycle.

**Status:** Report status at next meeting. **Item Open:** AJV-82 (Gary Fiske).

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**MEETING 16-01:** Gary Fiske (AJV-82) briefed that some of the identified Dallas area similar sounding/spelled fixes (NAVYS, NAAVY and NAVYE) were supposed to change on March 31, however they did not. In Atlanta, one of the identified fixes (SHELE & SCHEL) will change, and they may eliminate the ONYON arrival anyway (SHELE), but no specific time line given by ATL approach (probably 8-12 months due to staffing). Gary stated that several other instances were identified and have been fixed already, adding there is a tremendous amount of resistance to many changes due to facility preferences. Lev Prichard (APA) inquired about criteria, noting these issues have existed for a long time. Gary said criteria already exists in Order 7400.2 to look for similar sounding fix names within 300 miles, but it is a manual process and not easily applied. Tom Schneider (AFS-420) pointed out you only hear about these when something happens (i.e., ASRS report). Gary said many fix requests are not from the National Flight Data Center (NFDC) supplied list, but rather commemorate someone or something. Lev asked why there was no program to search out and identify potential issues. Bennie Hutto (NATCA) said on a Metroplex project, a list of names is requested and they do not check for similarities because they believe the list is already usable for that area. Gary said the problem is that even though names are unique, there can be spelling and pronunciation issues (i.e., the Dallas fixes). Also regional dialect can sway pronunciation. Frank Fortuna (AFFSA) said ICAO uses the International Codes and Routes Designators (ICARD) system which has an algorithm to check for these issues and suggested that it might be useful. Gary was unfamiliar with the ICARD system and said the FAA uses NFDC to check all the databases for fix name duplication, but that pronunciation is not an automated function. The point was made that when a fix is requested, sometimes NFDC asks the usage and wondered if that would affect the search parameters. Ted Thompson (Jeppesen) said they have business rules looking for same items, but it only looks at spelling, not pronunciation, and the issue is phonetics. He added with the different dialects in the US, when you have a non-English speaking crew, fix enunciation can sound completely different. Ted said he and Divya Chandra (VOLPE) attended a CNS Task Force meeting which had a presentation on a new metro plan. The plan had a list of about a dozen waypoint names, showing how each will look and how they should be pronounced. They both felt having a lexicon on how to pronounce a name should be a red flag. Tom asked if any NFDC personnel were present, and Jill Olson (AJV-5) said she was in email contact with NFDC (Scott Jerdan), he would be present tomorrow (27<sup>th</sup>), and she will inquire about these issues and if he is familiar with ICARD.

A brief follow up discussion occurred the next day on the ICARD search mechanism, and NFDC will take this back and examine along with looking at other search algorithms.

**Status:** Gary will continue to work on the identified similar fixes. Jill will discuss ICARD and other procedures with NFDC. **Item Open:** AJV-82 /AJV-5

*Editor's note: Follow on correspondence with NFDC subject matter experts stated that the ICARD system sound-alike function only checks against names in its data base, the max range is 500nm, and the data base is not current (being rebuilt). They offered the following comments:*

1. NFDC could stop allowing users to create new 5LNCs. This would allow us to improve name quality by checking what we have more closely and deleting the bad names.
2. Use only names from the list that we have now.
3. Only reserve names when the user "knows" where it will be used...provide proposed coordinates. This would help with the sound-alike search.
4. Have the ARTCCs examine their list and eliminate problem names.

**MEETING 16-02:** Gary Fiske (AJV-82) briefed this issue is emotional for some sites (desire for specific names), however most instances identified have been resolved or are scheduled for fix name replacement. The ATL fixes will be changed with the Metroplex project in 2017, and two STARS are being cancelled. One of the similar names at Dallas has been changed already and he is awaiting word on the remaining two. Gary added the ICAO ICARD program mentioned at ACF 16-01 is not a viable option to address future similar sounding issues. Valerie Watson (AJV-553) said this will not be an easy fix, as an automated solution is not available and human checks are necessary to prevent the problem. Gary concurred and added that current Orders state what is expected and what facilities are supposed to do, but the “mechanics” of the names are still part of the issue. Gary reiterated that he is fixing specific problems as they are identified. Tom Schneider (AFS-420) asked about revised language for Order JO 7400.2, and Jill Olsen (AJV-553) said her office is now the OPR for that Order. Tom said Mike Wallin (NFDC) had indicated at a previous meeting there would be expanded language for fixes considered, similar to what is now used for NAVAIDs. Language will be incorporated to prompt the procedure designer to consider the issue. Tom said once a problem is identified it takes a while to resolve, and Gary agreed adding that a single case can take as long as 18 months to resolve. Brian Townsend (American Airlines) inquired about using name/number combinations since it appears we are running out of pronounceable names. Ted Thompson (Jeppesen) said this is done in Australia and there are reported problems with this method and that human factors investigation should be done before the US considers that option.. Tom said this would involve extensive criteria/guidance changes. Valerie concurred, adding we are not running out of pronounceable names (Gary disagreed). Valerie took an IOU to confirm with NFDC that the US is not running out of pronounceable 5-letter fix names. Gary will continue to monitor identified name issues.

**Status:** Valerie Watson will confirm with NFDC that the US is not running out of pronounceable 5-letter fix names. Gary Fiske will continue to monitor identified name issues. **Item Open:** AJV-5 /AJV-82

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**MEETING 17-02:** John Bordy (Flight Procedure Standards Branch), briefed there were several outstanding IOUs from the last meeting. The first was for Valerie Watson (Aeronautical Information Services) to find out if the FAA is running out of pronounceable five-character fix names; she responded that NFDC assured her that we are not running out of names. Gary Fiske (AJT-24) asked why we are permitting fix names to be created with consonants only, particularly since we are not running out of names. Tony Lawson (Aeronautical Information Services) said they pull from a list of available names, and Gary added some projects (such as Metroplex) request site specific related names. Thompson (Jeppesen) said pronounceability/lack-of is the root of the issue. Two examples were cited by the group; PLFMD and CHRCL. The group was able to determine that both of these fixes are site specific, and thus the pronunciation might only be obvious locally. PLFMD near Charleston, SC sounding like “Pluff Mud” and CHRCL being near Louisville, KY sounding like “Churchill” (as in Churchill Downs). John asked if we need a policy that prohibits the request of certain names to reduce issues like these. Rich Boll (NBAA) said when NorCal put out their list of fix names several years prior they had to also publish a sheet on pronunciation. Valerie agreed to take an action to consult with NFDC management to determine if the list of pronounceable names includes fixes without vowels and to see what their policy is to ensure the names they issue are pronounceable. Gary asked if NFDC or AJV-5 is vetting fix names that are specifically

requested. Lev Prichard (ALPA) asked what is being done about common sounding fix names (as opposed to pronunciation); John responded that we will also query NFDC as to whether or not there is a process to compare and eliminate fix names that sound similar to others. Ted suggested VOLPE has done research on this and should be consulted. Gary reviewed the resolution of the identified names from the original issue (ATL procedures gone and at DFW one name changed and other in progress) and added he has received no new similar problems. Gary is not aware of any open issues remaining. Lev stated awareness and education needs to increase to prevent these issues from happening again. John indicated he would look to see if there are any policy improvements that can be made to avoid these issues and indicated he would explore what the FAA can do to increase awareness and education on this issue to help avoid repeat issues.

**Action Items:**

Valerie Watson to research if the list of pronounceable names includes fixes without vowels and to see what NFDC policy is to ensure the names they issue are pronounceable  
John Bordy will engage with PBN office (STAR development) and Metroplex developers (through Tony Lawson) to enhance awareness of this charting forum issue.  
John Bordy to determine if policy (e.g., Order 8260.19) could be enhanced.

**Status:** Item will remain open until above actions are completed and the ACF-IPG is updated as to the status.

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**Meeting 18-01:** John Bordy (Flight Procedure Standards Branch) briefed on two action items: adding language to draft Order 8260.19I for awareness of common sounding fix names with procedures; will meet with PBN office on possible language changes during initial planning process for awareness in Order 7110.41. Bennie Hutto (NATCA) advised this is a site development document. Lev Prichard (APA) said this has been a problem for a long time. When pilots identify issues they have no easy place to send them, and it can take two years to fix, so a method to identify during development would be preferable. Kevin Allen (AA) mentioned two specific fixes on the SFO SERFR3 arrival, NARWL and NRRLI (published for 6 months), and Bennie agreed this was a problem and is being fixed. Ted Thompson (Jeppesen) said the issue appears to be enunciation vs. spelling. Bennie talked about reviewing the entire procedure when completed looking at every waypoint. Gary Fiske (AJT-24) said one problem is the folks involved in the design phase move on to new projects prior to the new fix names being “plugged in” to the design, and similar sounding fix issues may not be seen with the final review. The group agreed this is part of the problem and not an easy fix. Valerie Watson (Aeronautical Information Services) added NFDC has no automated way to check for issues. Ethan Israel (MITRE) thinks an automated system could be feasible, and mentioned he would be interested in investigating further. Michael Stromberg (UPS) suggested as a start to avoid fixes on the same route (i.e., a STAR) beginning with the same letter if possible, and John said that intent could be added to procedure design policy. Gary Fiske suggested (John agreed) not allowing facilities to request specific fixes for convenience. John requested the identification of a point of contact within the Air Traffic Organization (ATO) that he could work with, along with the National Flight Data Center (NFDC) in finding a solution to this issue. Gary mentioned he will ask his management to identify an ATO POC for this issue. Lev mentioned that if a facility has an issue

the problem is fixed within about six months, but if pilot identifies an issue it can often take 2-3 years for a solution. Rune Duke (AOPA) said in the last two months there have been four related Aviation Safety Reporting System (ASRS) reports. Rune asked about the routing of these reports, i.e., who is getting them and are they the right people to take action. John Barry (AIR-131) suggested standardization by a specific source for the phonetic enunciation of a word, and scrutinized prior to using the fix name. Bruce McGray (Flight Operations Branch) asked if an ASRS representative belongs in any of the groups (CNS; PARC; ACF; etc.) and Gary Fiske (AJT-24) said to send them to FAA offices. John Bordy took an IOU to look into routing. Gary said all original items in the issue have been resolved. Lev want an ATO POC established for similar sounding names as at least a temporary fix, and Rich Boll (NBAA) agrees with the need for a common reporting POC above the facility level.

**Action Items:**

- Gary Fiske to provide an ATO POC to assist in working this issue.
- John Bordy to work with the ATO POC and NFDC to try to find a resolution.
- John Bordy will look into routing issues for ASRS reports related to the issue.
- John will continue draft language work on FAA Order 8260.19I and consider incorporating some discussed ideas.

**Status:** Item open.

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**Meeting 18-02:** John Bordy (Flight Procedures and Airspace Group) briefed the status of the previous meetings action items. The first was for Gary Fiske, ATO, to provide an air traffic control POC to assist in correcting known deficiencies. Gary did provide a POC; John Bordy had two meetings with the ATC representative and representatives from the National Flight Data Center to discuss the status of correcting issues. The other action was to report how Aviation Safety Reporting System reports related to common sounding fix names routes through the FAA and what is then done with them. John explained that these reports are sent directly to the ATC control facility in whose airspace the fixes are located within, and that they are sent to Aeronautical Information Services (AJV-5). Courtesy copies of the reports are sent to other various elements within the FAA as well as to industry groups. Recently four reports were filed within about four months so this is concerning. John indicated there is existing policy within FAA Order JO 7400.2, Procedures for Handling Airspace Matters, to avoid this however it may be difficult to apply in some cases because it requires knowledge of other fixes that may have a similar pronounce sound. When issues are identified, a subjective evaluation must be made if procedure amendments are required or not. If required, then the amendments must be prioritized by the applicable Regional Airspace Procedures Team in accordance with the FAA Order 8260.43, Flight Procedures Management Program. John indicated that he would add language similar to the language within FAA Order JO 7400.2 to highlight to procedure planners and designers the need to avoid establishing fix names that have similar sounds in proximity to each other. Another initiative that is being explored is the possibility of securing funding to ask the MITRE Corporation to look into an automated identification process to assist in identify similar sounding names. Jose Alfonso, AJV-53, advised NFDC is the keeper of the database (fix names), not the owner, and is concerned about a false sense of work assignment that may be attributed to

the NFDC. John Bordy asked who is responsible for complying with the FAA Order 7400.2 requirement to avoid the issuance of similar sounding fix names. Gary Fiske, AJT-22, advised AJV-1 “owns” the requirements in FAA Order 7400.2, but the specific responsibility lies with the overlying ARTCC. Lev Prichard, APA, asked about any future identified issues, and John Bordy said either the ARTCC or Service center responsible for the airspace could be notified. An idea was voiced that when establishing fix names, the request should be accompanied by the intended pronunciation.

**Action Item:** John Bordy will provide an update to the group relating to additions to FAA Order 8260.19 and new developments regarding discussions with the ATC representative.

**Status:** Item open.

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**Meeting 19-01** John Bordy, Flight Procedures and Airspace Group, briefed the issue directly from the [slide](#): Original examples with similar sounding fix names have been corrected. The [IFP Gateway](#) is available to any user (pilots, ATC, etc.) to request amendments to procedures and/or fix names. John Bordy said he reviewed the Order 8260.19 and is unsure if additional guidance is needed there to address this issue since the requirement to avoid similar sounding fix names within 300 NM of each other is already within Order JO 7400.2. One of the challenges of the 300 NM rule is that the search must be performed manually within the FAA, since there is no automation tool available. Such a tool appears to be feasible, since there are web sites that will allow you to look for similar spelled and sounding fix names already (e.g., [www.aimnav.com](http://www.aimnav.com)); similar technology to assist the FAA should be explored (John Bordy action to continue looking into this). John Bordy mentioned new reports of similar sounding fix names received through the Aviation Safety Reporting System (ASRS) appear to be routed through the appropriate FAA offices, to include the controlling ATC facility, ATO Safety, Flight Standards, and Aeronautical Information Services (AIS). Some fixes have been amended based on ASRS reports; however, a single report may not necessarily result in an amendment. Lev Prichard, APA, mentioned pilots don’t always fill out Aviation Safety Action Program (ASAP) forms or ASRS reports, therefore a single report may hide the fact that there could have been multiple instances of an issue (for example, with similar sounding fix names). Lev said they have experience taking ASAP reports directly to ATC facilities to show them a problem exists with fix names; however, ATC facilities often have no desire to change the fix names. Lev indicated when reports are received, they need to be treated seriously so that someone does something to correct the underlying issue. John Bordy mentioned has recently put more emphasis in routing and tracking issues reported through the ASRS. He also stressed that everyone has the ability to make a formal request to change instrument flight procedure via IFP Gateway; if the desired response is not forthcoming from the FAA, then issue may need to be elevated using the Order 8260.43 process. Gary Fiske, AJV-82 (contract support), mentioned that perhaps the ability of an ATC facility to retain certain fix names that have been reported needs to be taken out of their hands if the problem fixes are near each other. John Bordy asked Gary Fiske who within the FAA can direct the facilities to do that. Robert Connell, AJV-14, responded by saying their office and the Western Service Area corrected three pairs of fixes reported through the IFP Gateway within the past year. He agreed the IFP Gateway is the formal mechanism to request changes, but stressed that it is helpful to attach safety documentation to the request (e.g., ASRS, ASAP, ATSAP, reports) to increase the



priority of the requested amendment. TJ Nichols, Flight Procedures and Airspace Group, said the requirement to avoid similar sounding names already exists, however the point at which the names are checked in the procedure design process may need to change. This may need to be resolved before looking at a software solution. John Collins said it would be helpful if there was a “report similar sounding fix name” link on the IFP Gateway. John Bordy then displayed the IFP Gateway for the entire audience and provided a quick walk-through on how to request new procedures or amendments, and how to submit an inquiry related to instrument flight procedures. John Collins was not sure how many pilots know about the IFP Gateway. John Bordy mentioned that the recent publication of Order 8260.43C established the Gateway as the official means to request new procedures or amendments, however agreed that an FAA order is not the best medium for informing the public and that perhaps a companion advisory circular is needed. Valerie Watson, AJV-A, mentioned the same email address that is on the IFP Gateway (for submitting inquiries) are on FAA developed publications for use when reporting charting errors and recommendations. Rune Duke mentioned AOPA has a fact sheet out describing the IFP Gateway’s purpose, but an advisory circular could be helpful. Lev stated ASRS is not inclusive of everything reported through ASAP or ASIAs; John Bordy took an action to determine how those are routed. Ron Haag, AJV-A, mentioned the Aeronautical Information Portal was just implemented and can be used for submitting inquiries related to flight procedures as well. Valerie Watson added that language on the portal could possibly be improved to be more intuitive to the user; she agreed to look into this and report back.

#### **Action Items:**

- John Bordy will research feasibility of a software solution to conduct checks for similar sounding fix names.
- John Bordy to report if an advisory circular is needed to mirror some of the information within Order 8260.43.
- John Bordy took an action to look at routing of the ASAP reports.
- Valerie Watson to determine if language on the the Aeronautical Information Portal could be improved to be more intuitive to the user.

**Status:** Item open.

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**Meeting 19-02** John Bordy, FAA Flight Procedures and Airspace Group, briefed the issue summary and current status from the [slide](#). Allied Pilots Association (APA) originally introduced this issue. Many of the original examples have been corrected. In the previous six months, only a single report was received with two fixes in the Orlando area. One fix has been deleted and the other will be resolved. The possibility of an automated solution was raised in a previous meeting and MITRE offered to provide a briefing, which was delivered by Hunter Kopald ([slide](#)). John stated an office of primary responsibility (OPR) would need to be identified to work the issue, and that he would take the information back to the Flight Procedures and Airspace Group to determine next steps. John discussed increasing public awareness of the IFP Gateway as a conduit for users to submit concerns with similar sounding fix names. However, since information regarding the IFP Gateway is contained in Order 8260.43, and since FAA orders are

intended to provide guidance to FAA personnel and are not widely available to the public, this information is not likely known by the end users. John stated that previous discussions have suggested publication of an advisory circular with this information, but this would need further discussion. Gary Fiske (CTR), FAA/AJV-P31, inquired if publications should contain information guiding users to the Gateway, and Valerie Watson FAA/AJV-A25, said that information is already on all FAA procedure products directing users to a contact for charting errors, changes, additions, or recommendations. Valerie added this is only for existing procedures. John asked if Jeppesen or Lido charting products did the same, but representatives from both said they only direct users to their respective companies. Paul Hannah, Leads Engineering, inquired about the possibility of publishing the recommended pronunciation in an audio format along with the fix identifier. Rich Boll, NBAA commented the problem is the fixes are not seen until late in the development process, when the procedures are posted to the IFP Gateway just a few weeks before publication. Rich said it is way too late at that point to affect changes. Lev Prichard, APA agreed with Rich that industry needs to be involved in the planning phase of procedures during original development and stated that probably 90% of Aviation Safety Action Program (ASAP) reports on new procedures are the result of how the procedure is depicted, and waiting until they are posted on the IFP Gateway doesn't allow adequate opportunity to identify and address problems. Gary McMullin, Southwest Airlines agreed, adding industry used to be involved early in the process but now they do not see a procedure until on the coordination site. He also stated that fix names haven't typically been assigned when under development, and they don't have an opportunity to identify problems with fix names with adequate time before publication. It was suggested industry needs to be involved for input with the service centers when development starts, and the question was posed if the coordination process could be expanded. Dave Teffeteller, FAA/AJV-A433, suggested this possibility should be pushed to the service centers, who were not represented at this meeting. Valerie stated that during a previous meeting, the suggestion had been raised of utilizing the international phonetic standard to standardize the pronunciation of fix names and reduce the possibility of confusion from differing pronunciations. Kevin Kessler, Air Force Flight Standards Agency (AFFSA), stated there is such a document, and offered to procure it before the next meeting. A meeting participant also stated he has discovered that users can't access the IFP Gateway website without an FAA or NATCA email address. The group was unaware of this, but Dave stated he would confirm this. *Editor's note: Dave Teffeteller briefed later in the day that IFP Gateway access had changed; recent changes to the Gateway did restrict and re-route non-FAA email addresses, restricting access, but this has been resolved. All inputs are routed to the appropriate Flight Procedures Team.*

#### **Action Items:**

- FAA Flight Procedures and Airspace Group will look at need for a document to inform the public/industry on the internal procedure development process and the coordination process to request new/changes
- FAA/AJV-A will review the timeliness of instrument flight procedure coordination
- Kevin Kessler, AFFSA, will research the ICAO international phonetic standard and present at the next meeting

**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](#). FPAG discussed internally the value of developing a document for the public and industry that would describe the procedure development process, and also the processes to report concerns with flight procedures, including common sounding fix names. FPAG determined there is value, and will move forward with developing one, but there is no timeline. This is a bigger project than just this specific issue of common sounding fix names, so FPAG intends to decouple the issue and pursue separately. Jeff said resolving or preventing common sounding fix names with automation is a challenge and discussed the MITRE automation tools, but reiterated there is no current way in automation to prevent this from happening. There is an existing process to raise issues through the FAA's Instrument Flight Procedures (IFP) Information Gateway when a problem with a procedure is identified. There are a finite number of five-letter identifiers, and pronunciation variances abound. Also, since some fix names are assigned late in the procedure development process, early coordination is not a viable solution. Gary McMullin (Southwest Airlines) discussed existing policies that compared fix names to the global fix name usage, and this can cause difficulties for developers. He questions this broad global review, suggesting the review should be regionally limited and said the National Flight Data Center (NFDC) had requested Southwest Airlines change a proposed fix name due to a conflict with a fix in South America. John Barry, FAA Aircraft Certification, discussed the ICAO standard for regional grouping for fixes as opposed to mileage limitations. Jeff suggested closing the present issue, and either revisiting at a later date or adding a new RD specific to concerns regarding regional vs. global review of fix names. The original presenter, Lev Prichard, Allied Pilots Association, restated the origins of the proposal. He pointed out the issue is not just similar sounding names or similar spelling (which are both a problem), but in the Dallas-Fort Worth area there were three fixes with only one or two letter differences. They brought these up as a safety concern through the established safety processes, but the local facility refused to change the fixes. Lev wants the issue to remain open, so when a problem is entered into the IFP Gateway system as a safety concern, there will be a process in place to ensure it will be addressed. Diane Adams-Maturo, FPAG, thinks this can be built into the existing requirements in FAA Order 8260.19, adding facilities do not "own" the fixes as they are assigned and "owned" by NFDC. Lev agreed with this proposed approach. Doug Willey, Air Line Pilots Association, supports Lev's safety concerns on this subject. John Barry suggested the process should be elevated to a national level to dictate changes, possibly at NFDC. Rich Boll, NBAA, added that there should be requirements in Orders 8260.19 and 8260.3 regarding comments from industry through the IFP Gateway. Jeff said the issue will remain open, but should be reframed to address the specific concerns and issues regarding reporting of safety concerns via the IFP Gateway, but does not think Orders 8260.19 and 8260.3 are the place for this. Diane suggested a group or process could be identified to research the SMS process. She thought the checks could take place during IFP validation, and could be incorporated into the existing system. Lev added the SMS process is already in place with the FAA and industry. André Durocher suggested expanding the database to provide fix names with more letters, but Jeff said that would be a global change and well outside the scope of this group. Bennie Hutto, NATCA, agrees with Lev, adding when procedures are being developed no system identifies similar sounding fix names. Jeff said automation does not exist to identify similar sounding fix names, and the technology required to accomplish this is not feasible at this

time. Dan Wacker, FPAG, suggested this is more of a regional Flight Procedures Team and Instrument Flight Procedures Team issue, not a criteria issue, and those groups should be included in the discussions. Jeff agreed to reframe the issue to focus on discussions with FPAG and Aeronautical Information Services (AIS) to address concerns with submission of safety issues through the IFP Information Gateway.

**Action Items:**

- Flight Procedures and Airspace Group will approach AIS regarding discussions to address concerns with submission of safety issues through the IFP Information Gateway.
- Flight Procedures and Airspace Group and AJV-A will lead the review of the existing processes and policies for any gaps regarding common sounding fix names.

**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](#). Jeff recapped the last ACM discussion on the fixes in the Dallas-Fort Worth area. While there are already requirements to avoid common sounding fix names in close proximity, and there are not any feasible automation solutions to prevent this, the issue was held open to address the concern of unresolved safety issues.

There is currently no process to pursue a safety issue a reporter feels has not been adequately addressed. Jeff said discussions on a possible resolution are ongoing, to possibly include developing an appeal process, and the item will remain open. Lev Prichard, Allied Pilots Association, appreciated the issue remaining open, but added it is concerning when an identified problem is disregarded. Gary Fiske, FAA ATC Procedures (Terminal) Team (AJV-P310), said issues with resolving common sounding fix names has been a persistent problem without an easy fix, but if cases are identified they should be corrected. He says no easy way to fix these exists, and this might warrant closing this item and starting a new agenda item. Rich Boll, NBAA, agreed with Gary that a new agenda item addressing safety concerns thru the IFP Gateway could not only include this, but bring in other potential problems and that the title of the new agenda might grab more attention. Lev said this might just delay the original fix name conflict problem, and would like this issue to remain open until that is completed. Lev agreed that the criteria in place should stop new conflicting names, but reiterated when ASAP or other programs identify a safety issue, it is frustrating when the issue is not corrected. He also suggested there could be a “referee” to help resolve unaddressed issues submitted through the IFP Gateway or other reporting means.

Don McGough, FAA Aircraft Operations Technical Support (AJF-170), said part of their flight inspection process is identifying similar sounding fix names, and they do note them when identified. Pat Mulqueen, FAA Aeronautical Information Services (AIS), says AIS is always willing to change identified fix conflicts, but that ATC facilities are sometimes unwilling for fix names to be changed.

**Action Items:**

- Flight Procedures and Airspace Group will continue to work with Aeronautical Information Services to determine an appropriate method to resolve disagreements related to application of JO 7400.2M, paragraph 3-3-3.b and Order 8260.19I, paragraph 8-5-1.d

**Status:** Item open

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**Meeting 21-02:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the [slide](#). Order 8260.19 has generic guidance to not use similar sounding fix names in the same geographic area. At ACM 21-01, the Agency took an action to get the necessary entities together to discuss the issue, however scheduling has been an issue and that meeting has not yet happened. The action will be the same as last time – to hold a group discussion on the issue with associated entities. Item remains open. John Moore, Jeppesen, said since it is the Agency’s intent to not use similar sounding fix names in a geographic area, definitions of the area would be needed. Jeff said Order 8260.19 language has been there for a long time and, to his knowledge, has not been revised since this issue was introduced, adding Order 7400.2 defines a 300 NM radius around the NAVAID involved. John added ICAO, NBAA, and others are looking at the issue, and any solutions would be great. Jeff advised there is a new recommendation document (RD) that will address a similar issue. Andre Durocher, general aviation pilot, gave several ideas: we should look for unused waypoints and move them elsewhere, and then discussed his new naming convention thoughts to use throughout the NAS. He suggested using the airport identifier for the first three letters, compass direction for the fourth, and relative distance from the airport for the fifth. A long-term solution would be to allow more than five characters. Jeff said this concept would require a new RD, and added there is a new RD (21-02-357) regarding naming convention changes. Michael Stromberg, UPS, thought Andre’s concept would be confusing from a pilot’s perspective. Bennie Hutto, NATCA said it currently takes a long time for a name change on a procedure (a year to 18 months), and this needs to be addressed as part of the discussions. He added Aeronautical Information Services has taken control of TARGETS, and questioned if an algorithm could be added in the application to search for similar sounding fix names. Jeff said that has been discussed, MITRE is looking at this possibility, however it is not expected to be a timely solution. One problem is that similar spelling can be pronounced many different ways, and pilots/controllers can be “creative” in pronunciation. Gary Fiske, FAA ATC Procedures (Terminal) Team (AJV-P310), said he has complained for years about this problem, fixed several specific issues, and mentioned the ICAO ICARD system has been looked at and will probably not fix the issue. Gary added a revision of Order 7400.2 is in coordination, and these associated paragraphs are being modified. The 300 NM range will remain, but responsibilities for who will be reviewing these will move from the ARTCCs to the Airspace Procedures Office.

**Actions:** The Agency will have a group discussion on the issue with associated entities, and report at the next ACM.

**Status:** Item open

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**Meeting 22-01:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from the ([slide](#)). The FPAG did discuss this with AIS, and the process to resolve identified issues continues to be via a report through the [IFP Gateway website](#). Jeff said various suggestions on how to resolve these issues discussed in the past have not been feasible, but added FAA NFDC says the availability of usable fix names is large. There have been technological solutions explored, but automated solutions are not available yet and MITRE is still investigating possibilities. Jeff said there is nothing more that can be done at this time with this issue, since a mechanism is already in place to resolve identified concerns. Bennie Hutto, NATCA, said that a recent PARC recommendation to add waypoint names at or near DME fixes was rejected, with the shortage of pronounceable fix names provided as a reason, and asked Jeff to confirm there is no shortage of five-letter fix names. Valerie Watson, FAA Charting Products Integration Team (AJV-A250), said that became an issue of redundancy (placing a five-letter fix at the same point where an identifier already exists), adding there is a finite number of useable fixes but not a shortage, and they should be used judiciously. Gary Fiske, FAA ATC Procedures (Terminal) Team (AJV-P310), added the problem is pronounceability, not the quantity available. He suggested the alphanumeric naming as used in other states may have to be considered. Rich Boll, NBAA, agreed with Gary, and added understandability is another issue. TJ Nichols, FPAG, suggested if the concern is pronounceability, perhaps criteria should exist for fixes that are used in ATC communications to be given priority for pronounceability. Jeff pointed out that pronounceability is subjective. TJ said this RD was originally about two similar-sounding fix names in close proximity. Vince Massimini, general aviation pilot, added this item was actually for fix names that the facilities did not want to change when identified. Michael Stromberg, Independent Pilots Association (IPA)/UPS, concurred with the discussion and agrees the issue should be closed. Jeff said the issue will be closed, and the [IFP Gateway link](#) is provided here for access on how to report identified issues.

**Status:** Item closed.