AERONAUTICAL CHARTING MEETING Instrument Procedures Group Meeting – April 23, 2019

RECOMMENDATION DOCUMENT

FAA Control # ACF-IPG RD 19-01-342

<u>Subject</u>: Charting "NA WHEN LOCAL WEATHER NOT AVAILABLE" for Alternate Minimums

Background/Discussion:

When alternate minimums are approved for a procedure, FAA Order 8260.19 currently has a requirement to chart the note "NA WHEN LOCAL WEATHER NOT AVAILABLE" if the procedure has a backup altimeter source (regardless if charted, or documented as a contingency on FAA Form 8260-9).

This note appears to be relative to rules in **14 CFR Part 97.169 IFR Alternate Airport Weather Minima**, which provide ceiling and visibility requirements when selecting alternate airport/procedures during flight planning.

It should be noted that the CFR requirement is intended for all procedures with approved alternate minimums, not just the ones with a backup altimeter source. Presumably, the intent of the note is to serve as a reminder to pilots that if the primary altimeter is not available, use of the backup altimeter does not provide relief of the ceiling and visibility requirement when selecting an alternate airport during flight planning.

While this seems reasonable to a certain degree, there are unintended consequences.

1. This note immediately causes the Alternate Minima approval to be non-standard, thus the "NA WHEN LOCAL WEATHER NOT AVAILABLE" note is inserted into the TPP Alternate Mins page. By itself, this would not be an issue, however **ALL non-standard alternate minimums and notes are <u>consolidated</u> in TPP. The resulting effect is that some airports will have this note, and others will not. This situation has led to pilots concluding that the airports and/or procedures that do not have this note are exempt from the ceiling & visibility requirement when selecting the airport as an alternate.**

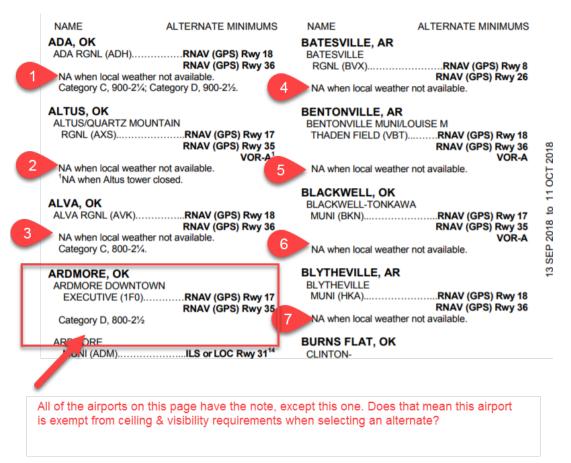
Excerpt from Askacfi.com:

The way I read it, you can use the ILS, LOC, VOR/DME approaches for alternate minimum planning even WITHOUT local weather being available.

Here's the airport that was being considered: **DES MOINES, IA**

DES MOINES INTL ILS or LOC Rwy 5¹ ILS or LOC Rwy 13¹ ILS or LOC Rwy 31¹ RNAV (GPS) Rwy 5² RNAV (GPS) Rwy 13² RNAV (GPS) Rwy 31² VOR/DME Rwy 23³

¹Category E, 900-234. ²NA when local weather not available. ³Category C, 800-214; Category D, 800-21/2. Only the RNAV procedures have the LOCAL WEATHER requirement; therefore, this pilot concluded that ceiling and visibility was not required for alternate planning, which is not in compliance with 97.169. 2. When all airports and procedures with non-standard minimums are consolidated into a single product, this may lead to reasonable conclusions that are unintended.



3. RNAV (RNP) procedures will never have a backup altimeter, and therefore will never have the "NA WHEN LOCAL WEATHER NOT AVAILABLE" note. This may lead to a reasonable conclusion that the RNP procedures are available for alternate purposes, regardless of ceiling & visibility availability.

Recommendations:

There are several options to resolve this issue.

OPTION 1:

Do not require the "NA WHEN LOCAL WEATHER NOT AVAILABLE" chart note and instead treat this as a pilot education opportunity with updates to AIM/IPH, etc. explaining that ceiling and visibility requirements per 97.169 are ALWAYS in effect for alternate airport/procedure selection, regardless of chart notes, backup altimeter circumstances, etc.

OPTION 2:

Require the "NA WHEN LOCAL WEATHER NOT AVAILABLE" chart note on all procedures with approved alternate minimums.

<u>Note</u>: this option effectively makes ALL alternate minimums non-standard. This would also require superfluous addition of literally every single airport and procedure in the inventory approved for alternate minimums.

OPTION 3:

Do not require the "NA WHEN LOCAL WEATHER NOT AVAILABLE" chart note and instead reinforce the ceiling & visibility requirement via use of a general note on the Alternate Mins page:

ALTERNATE MINS

18256



Α

INSTRUMENT APPROACH PROCEDURE CHARTS

IFR ALTERNATE AIRPORT MINIMUMS

Standard alternate minimums for non-precision approaches and approaches with vertical guidance [NDB, VOR, LOC, TACAN, LDA, SDF, VOR/DME, ASR, RNAV (GPS) or RNAV (RNP)] are 800-2. Standard alternate minimums for precision approaches (ILS, PAR, or GLS) are 600-2. Airports within this geographical area that require alternate minimums other than standard or alternate minimums with restrictions are listed below. NA - means alternate minimums are not authorized due to unmonitored facility, absence of weather reporting service, or lack of adequate navigation coverage. Civil pilots see FAR 91. IFR Alternate Minimums: Ceiling and Visibility Minimums not applicable to USA/USN/USAF. Pilots must review the IFR Alternate Minimums Notes for alternate airfield suitability.

ALL AIRPORTS: if local weather is not available, alternate minimums are NA.

Comments: None.

Submitted by:Tony LawsonOrganization:FAA, Aeronautical Information Services (AJV-A160)Phone:(405) 954-2788E-mail:tony.r.lawson@faa.govDate:04/05/2019

Initial Discussion Meeting 19-01: John Bordy, Flight Procedures and Airspace Group, briefed the issue directly from the slide: discussing the issue for Tony Lawson, AJV-A, who was not in attendance. The current practice of annotating certain alternate minimums as "NA when local weather not available" is inconsistent. John Bordy indicated part of the reason for the inconsistency is due to an error in the Order 8260.19, whereby the determination on when the annotation was required pointed to an incorrect paragraph; this will be corrected in Order 8260.19I. John Bordy asked all attendees to review the recommendation, and to provide feedback to Tony Lawson via e-mail. Valerie Watson, AJV-A, said charting would prefer a combination of options one and three, which is AIM guidance/education, plus the general statement in the Terminal Procedure Publication (as opposed to each set of minimums). Lev Prichard, APA, added that "local weather" isn't clearly defined. Additional discussion followed as to what type of forecast could be used when selecting an alternate (e.g., TAF, area forecast). John Bordy stated these issues will be researched and addressed as part of this issues. Rune Duke, AOPA, said this issue (as pertaining to Part 135 operators in Alaska) was mentioned as part of the recent reauthorization; John Bordy will review the reauthorization language for any pertinent information.

Action Items:

- John Bordy requests all review the issue, proposed options, and provide feedback to Tony Lawson via e-mail.
- John Bordy will work with the Flight Operations Group to determine local weather requirements for selecting alternate airports.

Status: Item open.

Meeting 19-02: John Bordy, FAA Flight Procedures and Airspace Group, briefed the issue summary and current status from the slide. John fixed an incorrect reference in Order 8260.19I indicating certain chart notes were required. In addition, the Flight Procedures and Airspace Group started to look in May at any possible changes for alternate minimums requirements, with little subsequent activity. The intent is to reengage on these discussions. John again asked the group to review the topic and provide feedback to Tony Lawson, FAA/AJV-533, since he has not received any comments. Valerie Watson, FAA/AJV-A25 asked if this issue applies to every airport, and John discussed how the incorrect note mentioned above led to confusion about terminal procedures publication entries regarding procedure NA when local weather unavailable. Flight Procedures and Airspace Group will work with John Blair, FAA Flight Operations Group, on the issue and will report any determinations reached at ACM 20-01. Lev Prichard, Allied Pilots Association, asked if there was progress in defining local weather, and John said that was part of the May meeting and further internal discussion was needed. Defining weather requirements will be part of these discussions, including what is driving non-standard alternate minimums. Lev and Rich Boll, NBAA, both pointed out local weather, if not clearly defined, could be assumed to be any number of sources, given the multiple data sources available to pilots in the modern era. It was also noted that the true need of local weather is unknown or unclear; it could be altimeter setting source and/or ceiling and visibility information. John noted procedure design drives non-standard alternate minimum requirements, often by circling minimums. John Bordy requested that if anyone was interested in joining in the discussion to resolve this issue, they should contact him.

Action Items:

- FAA Flight Procedures and Airspace Group will research with the Flight Operations Group regarding alternate weather requirements, and possible policy changes
- FAA Flight Procedures and Airspace Group will brief the results of those discussions at the next meeting

Status: Item open

<u>Meeting 20-02</u>: Jeff Rawdon, FAA Flight Procedures and Airspace Group, briefed the issue summary and current status from the <u>slide</u>. The issue has not yet been worked, but will remain open and actions remain the same.

Action Items:

- Flight Procedures and Airspace Group will research with the Flight Operations Group regarding alternate weather requirements, and possible policy changes
- Flight Procedures and Airspace Group will brief the results of those discussions at the next meeting

Status: Item open

Meeting 21-01: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the slide. This issue addresses inconsistent charting issues, and FPAG has not yet had a chance to work the issue. The issue remains open and will be worked, and progress will be briefed at the next ACM. Valerie Watson, FAA Charting Products Integration Team (AJV-A250), added the Charting Office feels this note should be general guidance in the introductory explanatory text in the alternate minimums section, since it applies to every approach procedure. Jeff said that had been a suggestion that would be in consideration, but any changes would require revision of the documentation requirements in Order 8269.19.

Action Items:

- Flight Procedures and Airspace Group will work with the Flight Operations Group regarding alternate weather requirements, and possible policy changes
- Flight Procedures and Airspace Group will brief the results of those discussions at the next meeting

Status: Item open

<u>Meeting 21-02</u>: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the <u>slide</u>. Higher priority work overtook this effort, and there has been no change since the previous meeting. The issue will remain open and be worked

when possible. Diane Adams-Maturo, FPAG, added there will be a working group, and Jeff said anyone who would like to participate in that effort should contact him via the ACM group email address (<u>9-AMC-AVS-ACM-Info@faa.gov</u>).

Actions: The Agency will form a working group and report status at the next ACM.

Status: Item open

<u>Meeting 22-01</u>: Diane Adams-Maturo, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and current status from the slide. Work is ongoing to determine what would be the necessary definition and need for "local weather" in the context of alternate minimums. Once the definition is settled, application of the definition to alternate minimums will be determined. Bill Tuccio, Garmin, agreed it will be nice to have this defined. Vince Massimini, general aviation pilot, said there are many potential definitions of local weather, so an effort to clarify is good. Steve Madigan, Garmin, added this appears to be related to his upcoming new RD. Jeff said work will continue on the issue and it will remain open.

<u>Actions</u>: FPAG will provide results from determination of definition of "local weather" and will report any potential order changes resulting from that determination.

Status: Item open

Meeting 22-02: Diane Adams-Maturo, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and status from slides. There was a small internal working group formed to discuss results from the last ACM meeting. Diane presented three suggested recommendations from that working group. The group suggested incorporating portions of all three recommendations, with the first step to better define "local weather." The WX Community of Interest (COI) proposed recommendation was shown with supporting background information. Updated TPP front matter has already been completed. Bill Tuccio, Garmin, discussed using local weather for alternate planning, pointing out pilots do not use the weather but are using the forecast information. He said pilots need a clear definition of the term "local weather," and Joshua Fenwick, Garmin, said the proposed definition seems to provide extra clarity. Dale Courtney, FAA/AJW-263, said it is not so much about having a Terminal Area Forecast (TAF), but that altimeter reporting or weather information from an observer or a qualified automated system (AWOS or ASOS) could meet the requirements for an alternate airport consideration. Bill set up a scenario with planning a three-hour instrument flight rules (IFR) flight that requires an alternate. He would see the note "NA when local weather not available," but at the time of filing he would not care about the current weather observations at the alternate airport. Vince Massimini, NavTec, said when filing a flight plan, there is no requirement for the destination or alternate to have a TAF. Trey Turner, Southwest Airlines, said though he flies for a Part 121 carrier, he also regularly flies GA IFR. He questioned the intent of the 600-2 and 800-2 standard alternate weather minima and if it was considered to account for deteriorating conditions on a local forecast. Jeff Rawdon, FPAG, said he did not know the

history of the standard alternate minimums values. Diane said this work is an ongoing effort and Jeff said the item would remain open at this time. John Collins, ForeFlight/Boeing, said this is a procedure qualification issue and should have nothing to do with the weather, but rather to determine if the procedure is usable as an alternate. Mike Crim asked if this is a question of alternate planning or a question of what drives the procedure to be not authorized with "NA" on a chart. Diane said some charts have the note "NA when local weather unavailable," and that was the original question. The effort is to define clarification of what the note means and showed the WX COI proposal (slide 5). Jeff added this would be worked as a criteria issue for the flight procedure designers. Joshua described Spirit of St. Louis RNAV (GPS) RWY 8L as an example, which is allowed for as an alternate procedure but has the note "NA when local weather not available." The question is the confusion of local vs. remote weather and/or altimeter and when a procedure can be used as an alternate. Bill said the note does not indicate whether the altimeter is available and feels that is a key part of the issue. John agreed with Bill but added the chart note should use the terminology "...when local altimeter not available..." as opposed to "local weather" for consistency. Dale said there are two separate issues in this and feels the local vs. remote altimeter discussion should be separate from the alternate minima discussion. Diane continued the briefing, showing possible AIM draft language. John Blair, FAA Flight Operations Group, said he had investigated origins of the 600-2 and 800-2 standard alternate minimums several years ago, and found it was a comparison of how Parts 121 & 135 utilize the minimums for alternate planning versus how they are utilized for Part 91. The intent was to make it simple so Part 91 pilots could use it. Bill discussed the last sentence in the proposed AIM language, suggesting a revision such as: "For the purpose of Part 91 operators considering an alternate, the note "NA when local weather not available" refers to the availability of the alternate airport local altimeter reporting. For example, an approved AWOS, ASOS, or ATIS. This does not refer to the availability of a forecast for the purpose of determining if an airport meets the requirements of 14 CFR 91.169; it is the pilot's responsibility to determine appropriate weather reports or weather forecasts." Jeff sent this to Diane for consideration. Diane showed a final slide regarding Pilot Controller Glossary draft language and will consider the suggestions. The effort is ongoing, and she welcomes any suggestions. Bill suggested a human factors review as proposals are developed.

Actions: FPAG will continue working this issue and will report status at ACM 23-01.

Status: Item open

<u>Meeting 23-01</u>: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue summary and status from slides. FPAG and FAA Flight Operations Group (FOG) have developed a proposed plan to address this topic, as shown on the (slide) and are requesting ACM input and feedback.

The proposed plan would add language to the preamble information of the alternate minimums section of the Terminal Procedure Publication (TPP) that would specify that procedures are not authorized for alternate flight planning purposes when local weather is not available. "NA when local weather not available" notes would be removed from individual airport and/or approach

alternate minimums section entries.

The proposal would not change current instrument approach charts; procedures that are currently not authorized as an alternate will retain the NA symbology, those that are authorized but have non-standard alternate information will retain the "A" symbology, and those that are standard will not have any symbology.

The proposal would not be implemented without a satisfactory safety review.

Bill Tuccio, Garmin, voiced approval for the proposal, but suggested we might need to consider OpSpec C055 (Alternate Airport IFR Weather Minimums) to see if text expansion would be necessary. Steven Madigan, Garmin, agrees that standardization will help and voiced support for the proposal.

Jennifer Hendi, FAA Charting Products Integration Team (AJV-A250), said Charting would be involved with removal of the information from the alternate minimums section entries. Krystal Kime, FAA Aeronautical Information Services Terminal Charting, pointed out that updated 8260-series forms would be required to remove the individual "NA when local weather not available" notes.

Bill discussed the local weather definition with regard to the note and pointed out the need encompassed more than just an altimeter source. Mark Mentovai, Manhattan Flight Club, discussed the process of flight planning with METAR and local weather needs. Joel Dickinson, FAA Flight Operations Group (FOG), said the theory is addressed in the TPP alternate minimums introductory information (slide) showing 14 CFR 91.169 pilot responsibilities for alternate planning, and reiterated that a safety review would still be necessary prior to implementation of any changes. Mark discussed a concern regarding how to determine local versus appropriate weather. Joshua Fenwick, Garmin, agreed with Mark that the definition of what constitutes local weather versus appropriate weather required clarification. Rich Boll, NBAA, pointed out the CFR language reading "(a)ppropriate weather reports or weather forecasts, or a combination of them…" and that METARs and TAFs should satisfy that requirement, and Joel agreed with Rich. Joel voiced that determination of the weather is the pilot's responsibility and thinks that this proposed plan and effort would be helpful.

Jeff summarized the discussion pointing out the general proposal appeared satisfactory but what constituted local weather might still be a discussion point. He voiced that a safety review would likely take that into consideration. Bruce Williams, CFI, suggested (via chat message) the FAA should add language similar to the proposal for the TPP to the AIM information regarding alternate minimums so the information is more visible to pilots.

Actions: FPAG will continue work to formalize the proposal and plan a safety review.

Status: Item open

Meeting 23-02: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from the slide. The proposal was presented at ACM 23-01 and received positive audience feedback. Implementation details are currently being resolved before conducing a safety review. It appears there will be numerous procedure amendments required in order to implement this change.

Actions: FPAG will continue to work through the implementation details and will plan a safety review according to that outcome. If the resource impact of the change is determined to make the proposal not feasible, the safety review may be deferred until after reporting back at ACM 24-01.

Status: Item open

<u>Meeting 24-01</u>: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from the slide. Planned changes to the terminal procedures publication alternate minimums section are still being worked within the FPAG.

Rich Boll, NBAA, would like to be involved with any conversation about what constitutes "local weather" and how to identify when local weather is not available. Joel Dickinson, FAA Flight Operations Group, said discussions with the Weather Community of Interest group identified the difficulty of defining "local weather" with respect to alternate minimums. Joel said the Code of Federal Regulations covers the rule for filing an alternate airport and suggested the public would not like a prescriptive list of weather sources and how to use them.

Rich suggested some language regarding applicable weather sources would be appropriate for the AIM and Joel and Rich agreed to discuss this possibility outside of the ACM.

Actions:

- Joel Dickinson, FAA Flight Operations Group, and Rich Boll, NBAA, will discuss the local weather definition and usage issue and report results of the conversations at ACM 24-02.
- FAA Flight Procedures and Airspace Group will continue to work through the implementation details and report any progress and decisions and report status at ACM 24-02.

Status: Item open

Meeting 24-02: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from a slide. Joel Dickinson, FAA Flight Operations Group (FOG), and Rich Boll, NBAA, have met to discuss the definition and usage of the term "local weather." Those discussions are ongoing. Jeff reported the charting specification change to update the alternate minimums textual information is in process.

Actions:

- Joel Dickinson, FAA Flight Operations Group, and Rich Boll, NBAA, will continue to discuss the local weather definition and usage and report the results at ACM 25-01.
- FAA Flight Procedures and Airspace Group will report on the status of the charting specification change to the alternate minimums textual information at ACM 25-01.

Status: Item open