

# AERONAUTICAL CHARTING MEETING

Instrument Procedures Group  
Meeting – October 25-26, 2021


## RECOMMENDATION DOCUMENT

FAA Control # 21-02-358

**Subject:** Canned FAA Chart Notes Leading to Pilot Error

### **Background/Discussion:**

Pilots have come forth with confusion as a result of conflicting chart notes. On a number of ILS approaches, there are notes preventing use of an autopilot (AP) for some or all of the approach. On the same chart is another note allowing lower RVR operations requiring the use of the autopilot. This is a human factors problem that should not exist.

MIAMI, FLORIDA			AL-257 (FAA)			20254		
LOC/DME I-BUL <b>110.9</b> Chan <b>46</b>	APP CRS <b>092°</b>	Rwy Idg <b>11397</b> TDZE <b>7</b> Apt Elev <b>9</b>	<b>ILS or LOC RWY 9</b> MIAMI INTL (MIA)					
RADAR required for procedure entry. DME required for LOC only.			MALSR 			MISSED APPROACH: Climb to 800 then climbing right turn to 3000 direct VKZ VOR/DME and hold, continue climb-in-hold to 3000.		
▼ <b>Autopilot coupled approach NA.</b> Simultaneous approach authorized. For inop ALS, increase S-ILS 9 Cat E visibility to RVR 4000 and S-LOC 9 Cat C/D visibility to 1 $\frac{3}{8}$ SM. <b>**RVR 1800 authorized with use of FD or AP or HUD to DA.</b>								
D-ATIS ARR <b>119.15</b> DEP <b>133.675</b>	MIAMI APP CON <b>124.85 322.3</b>	MIAMI TOWER <b>118.3 256.9</b>	GND CON <b>121.8</b> (8L/8R/12/26L/26R) <b>127.5</b> (9/27/30)		<b>348.6</b>	CLNC DEL <b>135.35</b>	CPDLC	

We have been told that AIS reviewed this and determined internally that this is in spec because the procedure designer just uses canned language.

### **Recommendations:**

Industry recommends another review by the FAA to include Human Factors experts, Pilots and Flight Standards. We will concede this might allow for some error as a result of allowing a procedure designer to alter this specific chart note. Input from the end users on the use of these chart notes may provide a better overall product by reducing confusion while simultaneously clarifying the intent of the restrictions levied by the procedure designer or flight inspection.

### **Comments:**

**Submitted by:** Ron Renk

**Organization:** United Airlines

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**Date:** 3/3/2021

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**Initial Meeting 21-02:** Ron Renk, United Airlines, presented the issue using the RD ([slide](#)), discussing pilot confusion with ILS approach notes. Some ILS chart notes prohibit use of an autopilot on portions of the approach, while on the same chart a note allows a lower visibility with use of flight director, autopilot, or head-up display (example slide shown). Ron noted the conflict between the two notes, adding that this can lead to human factors errors. The Jeppesen version of this chart has the two notes in different places, and they are briefed at different times, which can add even more confusion. Ron added Norfolk Intl has a different variation in language with a similar contradiction. Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), said the FAA had already started looking at this issue (there was a delay in bringing discussion at the ACM), and have a tracking item to work the issue. Rich Boll, NBAA, said he thought this concern had already been addressed in closed recommendation document (RD) 13-02-312 (jointly submitted with Bruce Williams), but that may have been part of the discussion on the previous issue. Rich thought the discussion with the previous issue was to remove the autopilot portion of the canned note. Jeff confirmed the language allowing this is still in Order 8260.19, and did not see that part of the discussion on the previous issue. Lev Prichard, Allied Pilots Association, concurred with the recommendation, and confirmed their pilots encounter the same confusion. Kevin Kessler, AFFSA, discussed an explanation he was sent from the FAA where a service road was established leading to uncontrolled vehicular traffic, leading to localizer signal disruptions, resulting in the note prohibiting use of autopilot. Jeff advised again this issue has been accepted, and is being internally tracked and worked, and will report status at the next meeting.

**Actions:** Issue accepted for continuation on the agenda. The Agency will report status at the following meeting.

**Status:** Item open

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**Meeting 22-01:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue ([slide](#)), is already being worked in the FPAG and no review by the ACM Recommendation Review Group (ARRG) was necessary. The issue is being tracked internally in the FPAG, and revisions will be in a future revision of Order 8260.19. John Moore, Boeing/Jeppesen, said he thinks the RD submitter (United Airlines) needs to be involved to ensure their concerns in the RD are addressed. Jeff said the draft preliminary language will be available when the future revision is in coordination, and the revised language will be presented at one or more ACM meetings. Brian Townsend, Allied Pilots Association, asked if an autopilot deactivation note would be included with the revision. Jeff agreed and said the FAA could look at specificity regarding autopilot usage if it is not already addressed in the order. This issue will remain open.

**Actions:** FPAG will consider incorporation of a note providing information for timing of autopilot deactivation. FPAG will report outcome of that consideration, and continue to provide status updates to incorporation of notes in Order 8260.19.

**Status:** Item open.

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**Meeting 22-02:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue ([slide](#)). This has generated an internal issue in Flight Standards where it will be tracked and worked. The issue will remain open and FPAG will continue to brief progress. Pat Mulqueen, FAA Instrument Flight Procedures Group (AJV-400), added the notes restricting autopilot coupled approach usually are added after the initial procedure design since the need is typically identified during flight inspection.

**Actions:** FPAG will draft appropriate changes for an upcoming revision of Order 8260.19 and will brief status at ACM 23-01.

**Status:** Item open

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**Meeting 23-01:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the summary, actions, and status from the ([slide](#)). Jeff displayed proposed revision language for Order 8260.19 and the Terminal Procedures Publication (TPP) inoperative components table note clarifying that autopilot would not be included in the RVR 1800 notes when autopilot is not authorized for the procedure. Jeff also displayed a Flight Standards waiver memorandum to the Flight Procedure Team specifying that autopilot requirements should not be included in RVR 1800 notes when autopilot usage is not authorized for the procedure. Jeff also stated that Flight Procedures Team has been correcting RVR 1800 notes accordingly.

Jeff advised that this RD will remain open at this time since the proposed language has not yet been incorporated into an Order 8260.19 revision.

Dan Wacker, FPAG, pointed out Order 8260.3 language on simultaneous approaches related to GLS, RNAV GPS, and RNP procedures and Dan will discuss with George Steinmetz, FPAG, and Diane Adams-Maturo, FPAG, requiring flight director or autopilot notes related to those procedures to ensure language on those is considered. John Blair, FAA Flight Operations Group (FOG), wants to be sure FOG is included in those conversations.

Charles Wade, Delta Air Lines, mentioned enhanced vision systems and past discussions related to those systems with SA CAT 1 and CAT 2 approaches. Jeff pointed out this RD did not address any systems other than autopilot.

**Actions:**

- Dan Wacker, FPAG, including FOG will follow up on Order 8260.3 requirements related to simultaneous approach procedures.
- FPAG will continue to work the issue and report on status of revisions to Orders 8260.19 and TPP inoperative components table notes.

**Status:** Item open

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**Meeting 23-02:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from a [slide](#). Flight Standards published a policy memo to describe that “or AP” language should be removed when a procedure has an autopilot restriction and that will be included in an upcoming Order 8260.19 revision.

FPAG and Flight Operations Group (FOG) are reviewing any necessary changes for simultaneous approach procedures with autopilot requirements.

**Actions:** FPAG will continue work on the Order 8260.19 changes, and any possible inclusion of simultaneous procedure requirements and will report status at ACM 24-01.

**Status:** Item open

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**Meeting 24-01:** Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed from a [slide](#). Planned Order 8260.3 and Order 8260.19 changes are identified but have not yet been scheduled for order revisions. Following up from a question during ACM 23-02, Jeff explained that the notes for autopilot usage during simultaneous procedures would not be impacted by these planned changes.

Jeff explained that this issue would be moved to action pending status since the order changes are known and will be scheduled later and are the only remaining work for this issue.

**Status:** Moved to action pending status

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