

AERONAUTICAL CHARTING MEETING
Instrument Procedures Group
Meeting 22-01 – April 25-26, 2022

RECOMMENDATION DOCUMENT

FAA Control # 22-01-364

Subject: Straight-In and Circling Minimums NA Notes

Background/Discussion:

Some approach charts, such as the RNAV (GPS) RWY 28 approach at Bermuda Dunes, CA (KUDD) include notes like the following:

Rwy 28 Straight-in and Circling minimums NA at night.

The chart does not, however, include a note that the procedure itself is NA at night.

These notes cause confusion among pilots and flight instructors, as was noted more than a decade ago in **RD 09-02-291**. That issue, which eventually focused on design criteria and internal FAA policy, was discussed for several years and then closed by the IPG at the 15-01 meeting without resolving the confusing language of the notes.

The guidance currently available to pilots and ATC remains ambiguous. For example, **AIM 5-5-4. Instrument Approach** lists several separate notes which can declare an entire procedure NA at night or state that straight-in and/or circling minimums are NA at night:

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- a. Pilot.
 - 1. Be aware that the controller issues clearance for approach based only on known traffic.
 - 2. Follows the procedure as shown on the IAP, including all restrictive notations, such as:
 - (a) Procedure not authorized at night;**
 - (b) Approach not authorized when local area altimeter not available;
 - (c) Procedure not authorized when control tower not in operation;
 - (d) Procedure not authorized when glide slope not used;
 - (e) Straight-in minimums not authorized at night; etc.**
 - (f) Radar required; or
 - (g) The circling minimums published on the instrument approach chart provide adequate obstruction clearance and pilots should not descend below the circling altitude until the aircraft is in a position to make final descent for landing. Sound judgment and knowledge of the pilot's and the aircraft's capabilities are the criteria for determining the exact maneuver in each instance since airport design and the aircraft position, altitude and airspeed must all be considered. [Emphasis added]
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Chapter 4 of the *Instrument Procedures Handbook* includes the following text:

If there is penetration of the 20:1 surface, the published visibility can be no lower than 1 SM with a note prohibiting approaches **to the affected runway at night** [emphasis added] (both straight-in and circling). [Figure 4-21] Circling may be permitted at night if penetrating obstacles are marked and lighted. If the penetrating obstacles are not marked and lighted, a note is published that night circling is “Not Authorized.”

The notes on the chart at KUDD don't explicitly say that the *entire approach is NA at night*, and, as noted above, when that prohibition is necessary, the AIM and TERPS give designers the option of including a note to that effect.

A literal reading of the AIM, the notes for this procedure, and the other guidance cited above, suggests that you can still fly the approach at night, *but you can't land on runway 28*. You could, it seems, fly the RWY 28 approach but circle to land on RWY 10. Or cancel IFR and land on runway 28 under VFR.

It seems that in the example at KUDD, if you were arriving from the east, you might prefer to fly the approach to RWY 28 and then circle to land RWY 10 instead of flying the approach to RWY 10. But you can't fly the RWY 28 approach and then land on that runway.

In the IFR training environment, we don't often talk about or practice "circling" to the "straight-in runway," but in most cases, that's an option. You could, for example, fly to the circling MDA to runway 36 (at some generic airport) and then, once over the runway and with the appropriate visual references and while fitting in with other traffic, join the pattern and land on 36 instead of, say, runway 18, 27, or 9. We sometimes do this in IFR training when we need to accomplish a circle-to-land approach to a landing as part of a stage check, IPC, or practical test, especially when the wind and prevailing traffic favor the "straight-in" runway and an airport has only one runway surface.

Recommendations:

FAA guidance for pilots and ATC in the AIM and handbooks such as the *Instrument Flying Handbook*, the *Instrument Procedures Handbook*, and *Air Traffic Control* should clarify the intent of such NA at Night notes.

Guidance for procedure designers and FAA charting organizations should also clarify the wording and publication of such notes on procedure charts.

If, for example, the intent is to make an entire procedure NA at night, a single note to that effect should be published on the chart:

Procedure NA at Night

If the procedure design requires that either straight-in or circling lines of minimums to a specific runway end are NA, then notes should make it clear that they apply to the *runway in the procedure title* and that circling to another runway may (or may not) be allowed:

Straight-in minimums to land RWY 28 NA at night
Circling minimums to land RWY 28 NA at night

Comments:

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Initial Meeting 22-01: The issue was presented by Bruce Williams, CFI, using his RD ([slide](#)). Bruce noted previous ACM issue 09-02-291 was closed at meeting 15-01 without a good resolution. Bruce discussed KUDD RNAV approaches to RWY 10 and RWY 28 in the RD, showing there are confusing notes about straight in and circling approaches not being authorized at night. The FAA recently issued a NOTAM to RNAV (GPS) RWY 10, stating “circling to RWY 28 NA at night.” Bruce recommends clarification in TERPS and in the AIM on the intent of these notes to reduce confusion for controllers and pilots, noting the difficulty for a pilot flying at night. Rich Boll, NBAA, inquired if this note is compliant with current Order 8260.19 criteria, and read the applicable criteria aloud. Bruce said the RNAV (GPS) RWY 28 approach note feels clumsy, with the note reading “Rwy 28 Straight-in and Circling minimums NA at night,” which could be interpreted to mean the entire procedure is NA at night if all circling minimums were NA. Rich pointed out the NOTAM for RNAV (GPS) RWY 10 adds a note “Circling to Rwy 28 NA at night,” and should perhaps be changed to “circling minimums NA at night.” Bruce said he sent an inquiry thru the IFP Gateway in November, and this NOTAM appeared. Dan Wacker, FAA Flight Procedures and Airspace Group (FPAG), noted that these notes were all reviewed several years ago, with criteria revised as necessary, and are being updated on a day-forward basis. Dan asked if there is a criteria issue now, and Bruce felt there was not, but that the notes were confusing. Dan added what is charted may be old criteria, but the notes will not be updated until the procedure is reviewed and amended day-forward, and that the old notes may still appear for many years. Dan asked if the AIM needs to be changed, and Bruce felt additional guidance in the AIM would help, citing AIM 5-4 (excerpt in the RD and current at meeting time). Bruce thought the guidance could be modified for clarity, and would be happy to assist any effort. Dan said the two versions of the note could be shown, as old and new, to help with understanding. The group discussed possible iterations of the notes for this airport. Mark Mentovai, Manhattan Flight Club, suggested the confusion is in the way the notes are conjoined with the word “and.” The requirements in Order 8260.19I to designate both straight-in and circling minimums as NA are separate and distinct, but on the approach plate in discussion, they are joined with “and,” rather than as two separate sentences. He noted no policy change should be necessary, but suggested cleaning up the NOTAM language. Mark suggested not including the runway associated with the procedure as that should be obvious, and would just add chart clutter. Bennie Hutto, NATCA, said a review of the notes appears to show only a straight-in to RWY 10 is allowed at night, and Jeff agreed the charted note could be interpreted to imply that, though that was not likely the intent. Bruce said the confusion for users is the note(s) seem to

indicate the procedure is unavailable at night. Johnnie Baker, FAA Instrument Flight Procedures Group (AJV-400), said the RWY 10 NOTAM documentation appears incorrect (the NOTAM contains the language “add note” which is not appropriate for a T-NOTAM) but the restriction of circling to RWY 28 at night would be appropriate due to 20:1 penetrations on RWY 28. Johnnie will get the verbiage of the NOTAM corrected. Rich suggested a NOTAM for RNAV (GPS) RWY 28 is needed to bring the note language into compliance with Order 8260.19. Rich added the forms indicate the procedure is 20 years old. Dan said these will be found in the NAS, and should be caught in periodic reviews. Dan asked if the AIM does capture the appropriate steps, and added he believes the criteria is correct but if the AIM is incorrect it should be fixed. If both Order 8260.19 and the AIM are correct, then as procedures are reviewed the notes will be corrected over time. Rich discussed ACM 09-02-291, which was closed in 2015, and if the changes reflected were from that, and Dan said he believed this was all part of the same effort, adding he and John Bordy also worked the notes issues through the US-IFPP issue 13-02-17. Bruce said his examples came from AIM language in 5-5-4 and Chapter 4 in the Instrument Procedures Handbook. Rich suggested we may need additional information in AIM 5-4 also. Bruce said he would assist in any proposed AIM language changes. Jeff summarized that the Order 8260.19 requirements appear correct, but some AIM review or updated guidance may be necessary. Jeff said it will take time for the procedures to be updated to current criteria, and that we do not issue NOTAMs to correct application of old criteria. Jeff added we need to avoid notes that might be construed to imply a VFR operation cannot land at night. Mark said it appears the 2002 procedure has some incorrect note language and asked if a NOTAM should be considered. Mark also asked to consider future Order 8260.19 language to differentiate IFR vs. VFR operations (i.e., “landing IFR RWY 28 not authorized”) to reduce confusion be developed, and Bruce agreed. Jeff noted that use of notes such as “landing RWY xx NA at night” can be wrongly interpreted as a restriction on VFR landings as well and are not desirable. Rich does think AIM 5-4-5 guidance on circling should be strengthened. Jeff advised this will be reviewed, specifically with AIM intent, and reminded all that criteria changes take a while to appear through all published procedures. He also noted that there is some lag between criteria effective dates and service provider implementation, and that the criteria effective date cannot be effectively compared to a procedure publication date for purposes of determining to what revision of criteria the procedure was developed.

Actions: This item will be reviewed by the ACM Recommendation Review Group to determine any potential action and that outcome will be provided at ACM 22-02. Johnnie Baker, FAA Instrument Flight Procedures Group (AJV-400), will have corrections made to the identified NOTAM.

Status: Item open.

Meeting 22-02: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the issue ([slide](#)). The NOTAM at KUDD identified in the RD has been corrected. Order 8260.19 has updated language for notes to address this issue but it will take time for those revised notes to propagate throughout the procedure inventory. The ACM Recommendation Review Group (ARRG) reviewed the issue and decided to not act on this recommendation. The RD submitter (Bruce Williams) was not at the meeting. Valerie Watson, FAA Charting Products Integration

Team (AJV-A250), pointed out that Rich Boll, NBAA, (not present at this meeting) suggested at ACM 22-01 that the AIM 5-4-5 circling guidance should be strengthened. Dan Wacker, FPAG, said he believed Rich's concern was one of the old notes versus the new notes; specifically, that over the time it will take for the new notes to propagate through all amended procedures AIM guidance could be used to better describe the notes. Karl von Valtier, NetJets, said his organization uses the notes for night restrictions when crafting internal policies for runway ends. They have encountered notes at the same facilities that do not appear to consistently align with one other. They feel there should be a criteria requirement when night circling to a runway is amended that other procedures to the same runway end should be evaluated for consistency and amended if necessary. Dan said this is not part of this issue and has not been addressed. Pat Mulqueen, FAA Instrument Flight Procedures Group (AJV-400), said this is a good topic and the IFP Group has received feedback from user groups and discussed internally. Minor amendments without restrictions to the runway may not receive a full review of all the notes and Pat said any concerns should be submitted via the Instrument Flight Procedures (IFP) Gateway website. Jeff said he does not see any reference to night circling restriction notes in AIM 5-4-5. Val suggested that was probably Rich's point. Several attendees agreed the old notes may be confusing. Diane Adams-Maturo, FPAG, discussed that day and night restrictions may have been combined which could create questions, but when considered separately the restrictions would seem clearer. Karl said there may be locations where the dimensions of the visual segment for straight-in and circling may be different leading to the possibility of restrictions for straight-in at night but not for circling. The procedure notes may correctly reflect that situation but could lead to pilot confusion. Jeff pointed out the lateral dimensions of the visual areas were harmonized around 2014, but differences in length between straight-in and circling visual areas to the same runway will still exist. The issue will remain open at this time to address the need for AIM language. Joel Dickinson, FAA Flight Operations Group (FOG), will discuss the need for AIM and IPH changes to address this topic and advise at the next ACM.

Actions: Joel Dickinson will review the need for AIM and IPH revisions within the Flight Operations Group to address this topic and will brief the results of that discussion at ACM 23-01.

Status: Item open.
