

FAA Control # 22-01-367

Background/Discussion:

The KOLV ILS or LOC RWY 18 publishes a hold with time and distance, as shown in Figure 1; Figure 2 highlights the hold.

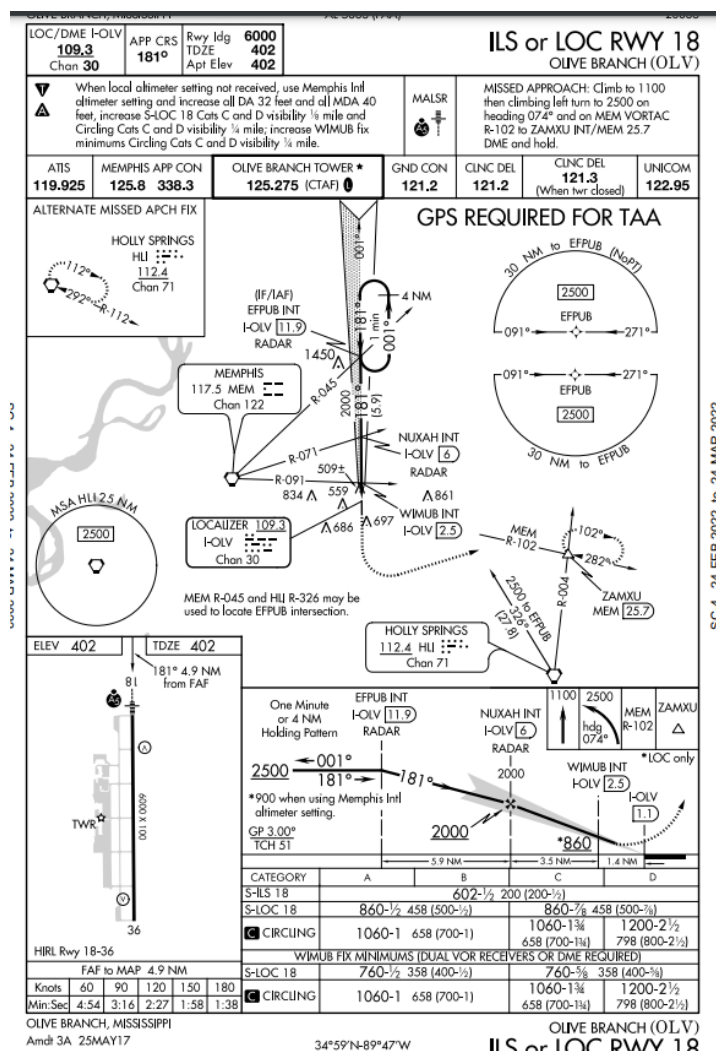


Figure 1. KOLV ILS or LOC 18.

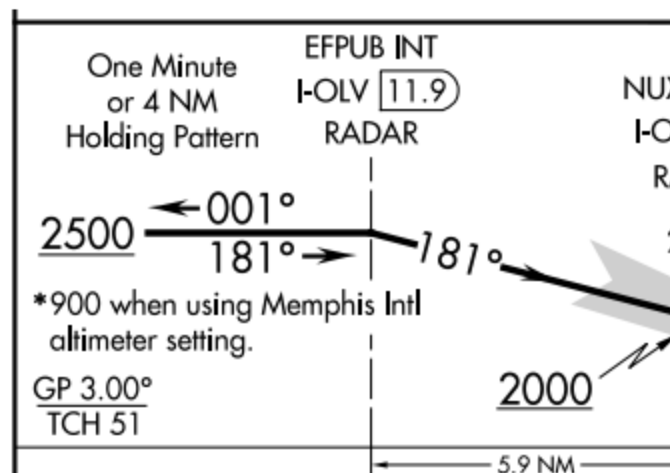
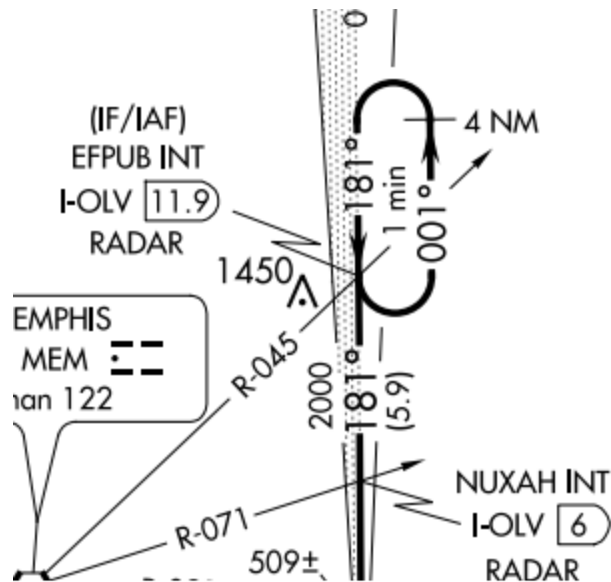


Figure 2. Hold zoomed in.

In response to an Aeronautical Inquiry to the FAA, the response indicated “the purpose of charting both, Timed Holding and Mileage Length, is to allow the aircraft pilot to choose which one they are capable of using based on the aircraft equipment available.” While this response is perfectly reasonable, the issue is there is no extant guidance the pilot can follow to make the choice (of course, all pilots are capable of doing timed holding).

Recommendations:

If FAA is going to design procedures published with both time and distance holding, AIM guidance should guide the pilot on which to use.

Comments:

Likely pilots will use distance as it is easier, but there should be guidance. Guidance will lower pilot cognitive workload.

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Initial Meeting 22-01: Bill Tuccio, Garmin, briefed the item from the RD ([slide](#)), saying this happens seldom but is a pain for Garmin. The example slide for OLV ILS or LOC RWY 18 shows both time and distance for holding at EFPUB INT, and there is no clear guidance for which the pilot should use. Garmin did submit an aeronautical inquiry on this approach, and the response was the pilot can choose based on aircraft equipage. Bill inquired if AIM guidance exists or is needed for these. Steve Madigan, Garmin, said this is a problem, since there is no way to code both. Rich Boll, NBAA, said this is a conventional procedure (even though it has a TAA), and can be flown either way based on equipage and preference. Valerie Watson, FAA Charting Products Integration Team (AJV-A250), advised there used to be a number of dual holding procedures in the NAS, and in 2013 charting was given guidance from Brad Rush, (then with Aeronautical Information Services) that this was not correct and to only publish one or the other. On conventional procedures, timing was charted, and Valerie added there are only three of these procedures left in the NAS depicting both distance and time. Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), said there is no Order 8260.19 policy to provide both. Johnnie Baker, FAA Instrument Flight Procedures Group (AJV-400), suggested the response to the aeronautical inquiry sent by Garmin could have a more appropriate response, and took an IOU to revisit that inquiry. Valerie suggested to either add policy in Order 8260.3 to allow these, along with publication of AIM guidance, or to correct the remaining three procedures. Jeff thought correcting the remaining three would be preferable. Vince Massimini, general aviation pilot, added there are thousands of conventional procedures that have the one minute holding patterns, and agreed it would be best to remove the distance on the remaining three. Mark Mentovai, Manhattan Flight Club, said there is a human factors charting issue if there is a difference in the holding distance and/or time between the plan and profile views. Mike Stromberg, Independent Pilots Association (IPA)/UPS, agreed no changes to pilot guidance would be necessary if the three remaining procedures are revised. Dan Wacker, FPAG, said the reason for the 4 NM distance depiction is to support the TAA holding per Order 8260.19 and suggested the FAA needs to remove the TAA and go to conventional only, or change the criteria to support RNAV and conventional holding at the same fix on the hybrid procedures. Jeff added there is a question if timing is prohibited when distance holding is shown, and Dan thought it was and wants to look at the documentation policy. Rich said per Order

8260.19, the MSA and TAA should not be used on the same procedure as they are on this approach plate. Johnnie added on all conventional procedures timing should be used for holding. Diane Adams-Maturo, FPAG, talked about how hybrid procedures can have disconnects with criteria, and the FAA should take a closer look, especially concerning Order 8260.19 policy. John Collins, Foreflight, pointed out that some ILS approaches, with MSA and TAA information both charted, were broken into separate Y & Z procedures, and this procedure could have done the same. Dan said the existing criteria in Orders 8260.19 and 8260.3 is correct. In Order 8260.3, RNAV holding must use distance, and using both MSA and TAA on the same chart is not allowed.

Action: This item will be reviewed by the ACM Recommendation Review Group to determine any action and that outcome will be provided at ACM 22-02. Johnnie Baker will review the previous inquiry sent by Garmin to determine if the response should have been different than that provided.

Status: Item open.

Meeting 22-02: Jeff Rawdon, FAA Flight Procedures and Airspace Group (FPAG), briefed the item from the RD ([slide](#)). From the last meeting, AJV-A committed to revisiting the Garmin inquiry. There were only three procedures affected, and Pat Mulqueen, FAA Instrument Flight Procedures Group (AJV-400), committed that the IFP Group would review these procedures. The ACM Recommendation Review Group (ARRG) decided to not accept the issue for work since the scope was so limited and the IFP Group was committing to amending these procedures. Bill Tuccio, Garmin, asked if any criteria changes were necessary and Jeff confirmed the criteria was reviewed and no changes were determined to be necessary. Pat later confirmed the three procedures were planned for amendments and recommended closing the issue. Garmin concurred with closure of the issue.

Status: Item closed.