



Federal Aviation Administration

Memorandum

Date:

To: Office of Airports, Airports Regional and Districts Offices, Washington DC

From: Wade E.K. Terrell, Manager, Flight Procedures and Airspace Group

Subject: January 2023 Policy for Low-Visibility Operations/Surface Movement
Guidance and Control Systems Tabletop and On-Site Reviews

Summary

The purpose of this memorandum is to provide relief from on-site Low-Visibility Operations/Surface Movement Guidance and Control Systems (LVO/SMGCS) which were derived from lessons learned during the COVID-19 Pandemic when travel was restricted. This memo supersedes the September 24, 2020 Memo titled "Low-Visibility Operations/Surface Movement Guidance and Control Systems Inspections during the COVID-19 Pandemic." These review procedures are in compliance with the current policy established in FAA Order 8000.94A, Procedures for Establishing Airport Low Visibility Operations and Approval of Low-Visibility Operations/Surface Movement Guidance and Control System Operations and FAA AC 120-57B, Surface Movement Guidance and Control System.

Background

Policies that restricted travel during the COVID-19 pandemic required FAA personnel to use alternate means to accomplish LVO/SMGCS evaluations/reviews and exercises. Combinations of virtual meetings, videos, and scenario-based exercises were used as an alternate means of compliance. Review and feedback from these evaluations showed the working groups were able to communicate effectively and maintain established safety standards contained within the LVO/SMGCS policy. Scenario-based table-top exercises were well received due to the fact that the airport could exercise their plan and simulate non-normal events without any interruption to on-going operations. As a result, Flight Standards policy changes are currently in coordination.

AFS has submitted the following bulleted actions as policy updates for AC 120-57 and FAA Order 8000.94 through established AVS Quality Management System (QMS) procedures:

- **The initial evaluation can be accomplished as a table-top exercise. However, with manager approval, the initial evaluation may also be accomplished on-site.** If accomplished on-site, a portion of the evaluation should be accomplished at night, to the maximum extent possible, to simulate restricted visibility conditions and include evaluation of lighting, markings, procedures, etc. as denoted in the LVO/SMGCS Plan Letter of Acceptance (LOA). The Airport Traffic Control Tower (ATCT) and the Airport Operator (AO) will complete a LOA to support LVO/SMGCS Operations. This LOA also signifies Air Traffic concurrence with the LVO/SMGCS Plan.
- A periodic review/exercise of the LVO/SMGCS Plan should be accomplished as a table-top exercise. However, with management approval, the review/exercise may be accomplished on-site. The team will evaluate the overall plan, observe functionality, serviceability checks, communication, etc.
- The FAA LVO/SMGCS Team will perform periodic review/exercises at airports with accepted LVO/SMGCS Plans. The interval between review/exercises should not exceed 36 months.
- After satisfactory completion of the review/exercise the Flight Technologies and Procedures Division, with concurrence of ARP and ATO, will send a LOA to the AO. There is no requirement for ARP or ATO to sign the LOA.

Recommendations Actions

The terms of inspections/reviews contained in the current policy mandates periodic on-site airport inspections by FAA Flight Standards every 12 to 18 months (FAA Order 8000.94 paragraph 9.a.).

Flight Procedures and Airspace Group (FPAG) actions:

- Review LVO/SMGCS status list.
- Continue to use tabletop review/exercises as the primary tool for LVO/SMGCS evaluations, reviews, and exercises. If the Aviation Safety Inspector (ASI) believes an onsite inspection is needed they must obtain permission from Flight Standards management.
- Provide the AO an LOA or email as appropriate for LVO/SMGCS using the virtual table-top option with a standardized paragraph stating:

A virtual tabletop (or on-site meeting) was held on (date) _____, with representatives of FAA Flight Standards, XXX Airport District Office, XXX Airport Operator and XXX Airport Traffic Control Tower (ATCT) or appropriate Air Traffic Organization (ATO) representative. The LVO/SMGCS plan currency and content was reviewed. No significant changes to the LVO/SMGCS plan or airport configuration have been made relative to the policies established in Advisory Circular 120-57B, Surface Movement Guidance and Control System and FAA Order 8000.94A, Procedures

for Establishing Airport Low Visibility Operations and Approval of Low-Visibility Operations/Surface Movement Guidance and Control System Operations

Airport Operator/Air Traffic Authority actions:

- If the FPAG and the LVO/SMGCS working group agree to a virtual table-top review, the AO should conduct their own LVO/SMGCS on-site inspections per FAA Order 8000.94 and AC 120-57.
- AO should initiate a virtual meeting of the LVO/SMGCS working group to discuss issues impacting LVO/SMGCS operations such as LVO/SMGCS route changes, future runway/taxiway maintenance, construction, etc.
- Report any discrepancies or findings to the responsible FPAG Aviation Safety Inspector.

Regional Airports Division actions:

- Airport Certification Safety Inspectors (ACSI) will continue to review LVO/SMGCS requirements.

The success of the LVO/SMGCS program, which was incorporated by ICAO members worldwide over many years, shows that our current LVO/SMGCS policies at participating airports are very effective in enhancing safe operations during low visibility conditions. No LVO/SMGCS incidents were reported to AFS during the entire COVID-19 pandemic. The proposed policy changes listed in the bullets above have shown that we can utilize FAA Aviation Safety Inspectors and financial assets more efficiently while still providing surveillance of airports with their established LVO/SMGCS operations.