

May 24, 2007

Mr. Nicholas Sabatini
Associate Administrator for Aviation Safety
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, DC 20591

Dear Nick:

The PARC is pleased to submit our recommendations for airspace policy and procedures that will best accommodate optimum performance-based RNP SAAAR instrument approach procedures.

It has become apparent there is a need to optimize FAA procedures for designating controlled airspace outside of metropolitan areas to permit the best possible design of RNP SAAAR IAPs into outlying airports. Also, FAA airspace policy needs to be amended to accommodate the safest possible airspace environment at airports with RNP SAAAR IAPs that have either part-time or no air traffic control towers (ATCTs). Please note the recommendations in this letter are not intended to apply to heliports. The attachment to this letter provides the policy and technical details.

PARC appreciates your continued support of our activities and invites you to join us in a discussion of these recommendations at your convenience. Please call me if you have any questions or would like to set up a discussion.

Sincerely,



Dave Nakamura
Chairman
Performance-based operations Aviation
Rulemaking Committee

Cc: J. McGraw
J. Williams
W. Roberts
PARC

Attachment

ATTACHMENT TO PARC'S AIRSPACE RECOMMENDATION LETTER

1. Airspace rule-making procedures employed in conjunction with the development and promulgation of instrument approach procedures need to be clarified to assure designation of Class E controlled airspace transition areas to support the optimum design of SAAAR RNP IAP terminal routes, approach segments, and missed approach segments. Where missed approach procedures require climb gradients, controlled airspace should be optimized so that climb gradients are required only to the extent necessary to over-fly obstacles. Further, no part of a SAAAR RNP IAP should be permitted to be outside of controlled airspace.
2. At airports with either a part-time or no ATCT, Class E Surface Airspace needs to be designated to support any such airport with one, or more, RNP SAAAR IAP. This is necessary to provide weather minimums (14 CFR 91.155(c), The Surface Area "*1,000 and 3*" weather rule) that will provide an adequate level of traffic-avoidance safety for RNP SAAAR instrument approach and missed approach operations. This recommendation will require an amendment to FAA's existing policy for the designation of Class E Surface Airspace. This recommendation is limited only to airports with one, or more, RNP SAAAR IAPs. Further, in the unusual circumstance where the lowest RNP SAAAR minimums for such an airport has a Decision Height/Altitude of greater than 1,200 feet above airport elevation, designation of Class E Surface Airspace would not be necessary.