

January 28, 2010

Mr. John M. Allen
Director, FAA Flight Standards Service
Federal Aviation Administration
800 Independence Avenue, S.W.
Washington, D.C. 20591

Dear John:

This letter concerns the method by which the FAA provides notice and coordination of new and amended Title 14, Code of Federal Regulations, Part 97 (Part 97) Standard Instrument Approach Procedures (SIAPs) with aviation stakeholders and other interested members of the public. Although this process is not a technical performance-based navigation issue, the PARC has an interest in the issue, particularly since private vendors now design Part 97 RNP SAAAR SIAPs.

As you know, for many years, the FAA National Aeronautical Navigation (AeroNav) Services (until recently, the National Flight Procedures Office) has maintained a public website that which contains procedure packages of proposed, original, and amended SIAPs. These procedure packages contain all data supporting the SIAP to include topographical maps depicting TERPS containment areas, the complete 8260-series forms documentation, and a graphic image that approximates an instrument approach chart.

Interested stakeholders and other members of the public find that the coordination website and procedure packages provide an effective means of assessing and providing comments on any proposed procedure. The procedures package is, in fact, the only full and effective description of pending amendments to Part 97. The bi-weekly Transmittal Letter, which is used to promulgate Part 97 procedures, only provides the basic information needed to produce an aeronautical chart and lacks the necessary information for stakeholders and other interested members of the public to make a meaningful assessment of any procedure. Further, by the time the Transmittal Letter becomes available to the public, it is too late for public comment.

In order to assure transparency for third-party-developed Part 97 SIAPs, these procedures should also be fully accessible to any member of the public without the requirement for codes or passwords to access these data that form the basis for regulatory amendments. One solution would be for AFS provide a conduit to the AeroNav Services coordination website, so that third-party vendors could load their procedures package onto that website in the same timely manner used by AeroNav Services to coordinate FAA-developed procedures. Third-party vendors should be allowed to participate in any decision about how to best implement transparency in SIAP coordination.

The process followed by either AeroNav Services or third-party vendors for comments, recommendations, or objections should also be transparent and provide sufficient lead time for effective resolution of any coordination conflicts. Presently, the process by which coordination conflicts are resolved is not sufficiently structured, nor is it consistent.

Finally, the periodic Part 97 preambles that appear in the Federal Register should contain procedures package access information. The PARC appreciates the opportunity to help make the coordination process for all SIAPs more effective. If you have any questions or would like to discuss this further, please feel free to call or email me.

Sincerely,

A handwritten signature in blue ink that reads "Dave Nakamura". The signature is fluid and cursive, with the first name "Dave" being more prominent than the last name "Nakamura".

Dave Nakamura
Chairman
Performance-based operations
Aviation Rulemaking Committee

Cc: M. Gilligan
J. McGraw
J. Hickey
H. Krakowski
J. McCarthy
L. Smith
B. DeCleene