GOVERNMENT/INDUSTRY AERONAUTICAL CHARTING FORUM
Instrument Procedures Group
(Transcribed/Re-Formatted)
HISTORY RECORD

FAA Control # 96-01-163

SUBJECT: Purpose of ILS Fix Inside the Precision FAF

BACKGROUND/DISCUSSION: The United States has elected to describe the point at which the precision final approach segment begins (point of intermediate altitude intercept with G/S) as the "Precision FAF," whereas ICAO calls this point the Precision Final Approach Point. Further, there is inconsistency between this United States definition, FAR 91.175(k) and note 4 to the precision part of TERPS, Table 9 implies that the OM or other authorized inside the Precision FAF is, in fact, the ILS FAF and is a mandatory part of the SIAP. This is reinforced by the language of FAR 91.175(k).

The question for the Forum: Is it United States operational policy to require a gross error check of the G/S at the OM (or authorized fix in-lieu-of) in order to fly a precision ILS SIAP? If so, this operational requirement should be clearly set forth in the AIM, where pilots are told that the LOC is required for the ILS. If this gross error check is not a fundamental operational requirement for the precision ILS, then 91.175(k) should be amended as well as TERPS, table 9, note 4. Further, if the gross error G/S check is mandatory, then the US should consider changing its definitions to be consistent with ICAO.

RECOMMENDATION: AFS-420 be tasked to coordinate with AFS-410 and AFS-200 about what the FAA requirement is for the G/S crosscheck. If it is determined that the check is mandatory, then the AIM should be revised as well as the US definition of a Precision FAF. If not, the AFS-420 should initiate a change to FAR 91.174(k) and TERPS, Table 9, note 4.

COMMENT: This recommendation affects HB 8260.3B, HB 8260.19C, AIM and FAR 91.175(k)

Submitted by: Tom Young, Chairman
Charting and Instrument Procedures Committee
Air Line Pilots Association
March 6, 1995

INITIAL DISCUSSION (MEETING 96-01): Tom Young, ALPA led the discussion as to the purpose of the charted FAF and glide slope altitude at the FAF on ILS IAPs, with the key issue being whether a gross error check of the glide slope is required to fly a precision approach. Paul Best, AFS-420, has volunteered to look into the issue and report at next meeting. AFS-420 will report back at next meeting. **Action:** Item Open (AFS-420).

MEETING 96-02: Bill Hammett, AFS-420, briefed that coordination with AFS-200 indicated that a gross error check of the glide slope is not required to fly a precision approach. The glide slope altitude at the OM (or non-precision FAF) is provided for reference only. It was further decided that an ILS approach could still be flown if the non-precision FAF was

inoperable. Wally Roberts, ALPA, emphasized that if this is true, then 14 CFR, Part 91.175(k) defining components of an ILS system requires updating. It is suspected that this process is in progress. AFS-420 will ascertain the status of the CFR change and brief at the next meeting. **Action:** Item Open (AFS-420).

MEETING 97-01: Paul Best, AFS-420 coordinated with ARM and determined that the change to Part 91.175(k) has been written. He has a verbal agreement that they will increase the priority on processing this rule change. AFS-420 will continue to track the status of the CFR change and brief at the next meeting. **Action:** Item Open (AFS-420).

MEETING 97-02: Paul Best, AFS-420 coordinated with ARM and determined that the change to Part 91.175(k) has been written. He has a verbal agreement that they will increase the priority on processing this rule change. AFS-420 will continue to track the status of the CFR change and brief at the next meeting. **Action:** Item Open (AFS-420).

MEETING 98-01: Paul Best, AFS-400 stated that this issue is still in AGC. During discussion Wally Roberts, ALPA emphasized the importance of cross checking altitude. ALPA also desires progress fixes on all precision IAP's. Paul will continue to track the status of the CFR change and brief at the next meeting. **Action:** Item Open (AFS-400).

MEETING 98-02: Paul Best, AFS-400, briefed that he could find no reference to a requirement to conduct an altitude cross check on a precision IAP. There also has been no progress in getting 14 CFR Part 91.175k changed to indicate that an 'OM or fix' is a required component of an ILS system (TERPS alludes to this requirement in several areas). The consensus of the group is that a fix, inside the GS intercept point, should always be present on an ILS approach, even if LOC minimums are not authorized. This will be considered for inclusion in Order 8260.19. Wally Roberts, ALPA, stated that there should also be a DME fix charted at the DH point on all ILS IAP's where the MM has been eliminated. The issue remains open pending revision of Part 91.175k. AFS-400 will continue monitoring the change to part 91.175k. **Action:** Item Open (AFS-400).

MEETING 99-01: This issue is being worked by the AFS NAS National resource Specialist (NRS), Paul Best, AFS-400 who was available for this meeting. Item will remain open pending revision of Part 91.174k. AFS-400 will continue to monitoring the change. **Action:** Item Open (AFS-400).

MEETING 99-02: Paul Best, AFS-400 stated that FAA will continue providing a fix inside glide slope intercept to allow a gross error glide slope check. The status of revision of Part 91.175k is unknown. Wally Roberts, ALPA stated that as long as a fix would continue to be published, the issue could be closed. The group concurred. **Action:** Item Closed.