

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

**FAA Control # 97-01-178**

**SUBJECT:** JFK VOR RWY 13L/R Waivers/LDIN Lights

**BACKGROUND/DISCUSSION:** ALPA is presently involved in the FAA Eastern Region's proposal to remove the first set of LDIN lights for the non-standard JFK VOR 13L/R SIAP. It has apparently become increasingly difficult for the FAA to maintain these lights, so they have decided to remove them. As a part of this process, AFS-400 rationalized a new Flight Procedures Standards Waiver to exclude the subject lights. ALPA believes that the waiver process was abused by AFS-400, by simply arguing a means to justify an unwarranted end result. In other words, the lights were being deleted, no matter what, so a new argument had to be made in an attempt to justify an equivalent level of safety. The waiver ignores FAA internal directives, including Chapter 3 of TERPS, about what constitutes bona-fide approach lighting and what constitutes visual/VFR LDIN lighting systems. Applicable FAA Advisory Circulars define approach light systems to not include LDIN lights, and that properly spaced LDIN lights are approximately 3,000 feet apart. These directives have been ignored by AFS-400 in its consideration of the revised JFK VOR Rwy 13L/R non-standard SIAP.

**RECOMMENDATION:** The Flight Procedures Standards Waiver process needs to be structured to provide objectivity, full technical justification, and accountability to all affected users and participants. This working group needs to look at the JFK LDIN lights as to their adequacy as proper LDIN lights for the extended distance they cover, much less whether they should be considered to be an IFR approach light system. If the latter is deemed appropriate, then Table 8 of TERPS needs to be updated accordingly, with supporting objective standards for LDINs.

**COMMENT:** This recommendation affects AC 150/5300-13 - Airport Design, the AIM-both as to content on ALS, and the Pilot/Controller Glossary about ALS, 8260.3B, and 8260.19C.

Submitted by: Captain Tom Young, Chairman  
Charting and Instrument Procedures Committee  
AIR LINE PILOTS ASSOCIATION  
March 6, 1997

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**INITIAL DISCUSSION (MEETING 97-01):** Position paper presented by Tom Young, ALPA. Key issue is contradiction between the pilot/Controller Glossary which lists LDIN lights as an approach light system, whereas TERPS Order lists the as VFR aid. Discussion also centered the value of LDIN lights in VFR and IFR arenas. Wally Roberts, ALPA has done some research in this arena and provided a draft of a proposal letter to AFS-420/440. A copy is attached. Jim Nixon, AFS-440 will research the issue and ensure applicable documents are in

agreement; AFS-440 will research applicable directives and ensure continuity. **Action:** Item Open (AFS-440).

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**MEETING 97-02:** Position paper presented by Tom Young, ALPA. Key issue is contradiction between the pilot/Controller Glossary which lists LDIN lights as an approach light system, whereas TERPS Order lists the as VFR aid. Discussion also centered the value of LDIN lights in VFR and IFR arenas. Wally Roberts, ALPA has done some research in this arena and provided a draft of a proposal letter to AFS-420/440. ALPA believes if the FAA wants to use LDIN lights as ALS, then the FAA needs to develop criteria that specifically defines LDIN light (i.e. light spacing and intensity). Jack Corman, AFS-420 briefed that Flight Standards position is that LDIN lights are approach lights. ALPA did not question this position, but want the regional office to verify that the JFK LDIN systems had proper spacing and number of lights. **Action:** non-specific.

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**MEETING 98-01:** Howard Swaney, AFS-420 briefed that AFS-400 elected to keep this issue open. Wally Roberts, ALPA briefed that there needs to be a standard definition of what constitutes LDIN Lights. The FAA Tech Center has never studied LDIN Lights. AFS-400 will initiate another study to assess lighting requirements. AFS-420 will initiate a study to define LDIN Lights requirements and provide a briefing at the next meeting. **Action:** Item Open (AFS-420)

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**MEETING 98-02:** Howard Swaney, AFS-420, and Paul Best, AFS-400, briefed that there has been much discussion on this issue within Flight Standards. The consensus is that LDIN lights are not approach lights. A formal AFS AAF position needs to be coordinated and published. AFS-420 took the IOU to prepare the position paper. AFS-420 will prepare and coordinate position paper to resolve the issue. **Action:** Item Open (AFS-420)

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**MEETING 99-01:** Howard Swaney, AFS-420, briefed that research indicates the problem is site specific and requested the issue be worked outside the forum between AFS, AVN and ALPA. Tom Young, ALPA, agreed provided that AFS-420 would pressure resolution. If there is no action, the issue will be re-introduced through the ACF, Instrument Procedures Subgroup. Issue will be worked off line. **Status:** Item Closed.