

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

FAA Control # 98-01-202

SUBJECT: TERPS Para 330c (2), "Fly Visual to Airport."

BACKGROUND/DISCUSSION: The general FARs regulating precision and non-precision Category I IFR approach and landing operations had their last major revision in 1981. Prior to 1981, the required visual cues to descend below MDA (continue descent below DH) or continue beyond the missed approach point were wildly permissive, in that only "Farmer Joe's Barn," familiar to the pilot, need be sighted in order to progress visually to yet-to-be-sighted runway or airport. Thus, all final segment and missed approach obstacle protection could be lost with no assurance that a safe landing would be made. In 1981, the rules were changed to the present 91.175(c), which requires that a specified runway-specific visual cue be in sight to descend below the minimum instrument altitude or beyond the MAP. Further, 91.175(e) requires a missed approach be immediately initiated if the required runway-specific visual cues are lost whenever the aircraft is below the minimum instrument altitude or past the MAP.

TERPS, Paragraph 330(c)(2), permits an end-run around the protections afforded by 91.175(c) and (e) by permitting the procedures specialist to qualify an instrument approach with a MAP miles prior to the runway (or airport) to be annotated "fly visual to airport" with a visibility minimum of not less than 2 miles. The FAA proposed, and subsequently withdrew, in Change 17 of TERPS to change the minimum visibility to 3 miles on the rationale that such early-MAP approach procedures would become, effectively, minimum VFR visual approaches, but which would not require the concurrence of the pilot in command, unlike ATC-initiated visual approaches. During the circulation of Change 17, the FAA asserted that the language "fly visual to airport" annotated to an instrument approach chart would be the Administrator's waiver to 91.175(c) and (e) for such instrument approach procedures; and that the authority for such waiver is set forth in preamble to the 1981 rule change, which resulted in today's 91.175.

MAPs several miles prior to the runway or airport occur where severe mountainous terrain won't permit standard application of TERPS criteria. Thus, as a pilot proceeds beyond the MAP and below the MDA (or DH) he progressively loses missed approach obstacle protection both by descending and proceeding beyond the MAP. South Lake Tahoe Airport is a good example of this application, except at this location the FAA applied conservative visibility minimums and did not invoke the permissive waiver to 91.175(c) and (e).

Some proponents of the subject Administrator's waiver point out that the proposed change in TERPS Change 17 would have made the minimum visibility 3 miles, which is basic VFR, and that an instrument approach procedure should never be more restrictive than basic VFR. In rebuttal to that argument, basic VFR requires both reported ceiling and visibility. Second, 1000-3 is not considered by most who fly jet aircraft to be sufficient ceiling and visibility for maneuvering under VFR conditions. Third, there are many charted visual approaches that require more than 3 miles visibility-the result of airline pilots working in concert with local ATC facilities.

RECOMMENDATION: That TERPS Paragraph 330(c)(2) be amended to require that the visibility minimum be not less than the distance from the MAP to the runway threshold (straight-in) or first portion of landing surface (circling). Relevant AIM language should be established to point out that not-for-hire pilots may elect to cancel IFR on such high visibility mountain approaches when the pilot is satisfied that he can safely proceed without either missed approach protection or sighting of the runway or airport environment. Part 121 and 135 pilots should be precluded by operations specifications from canceling IFR on such approach procedures (procedures where the MAP is more than 1 mile from the runway or airport) unless special crew qualification and conditions exist to provide an equivalent level of safety to the traveling public as is afforded when the provisions of 91.175(c) and (e) are in effect.

COMMENT: This change affects TERPS Paragraph 330(c)(2), the AIM, and the standard operations specifications.

Submitted by: Captain Tom Young, Chairman
Charting and Instrument Procedures Committee
AIR LINE PILOTS ASSOCIATION
PH:(703) 689-4176 FAX: (703) 689-4370
April 22, 1998

INITIAL DISCUSSION (MEETING 98-01): Tom Young, ALPA presented a summary of their position and recommendation document. In this document ALPA explains the CFR reference to precision and non-precision Cat I approach and landing may be outdated (last revision 1981). It is ALPA's contention that changes associated with new technologies, aircraft, and pilot performance requires amendment to these CFR references, specifically Parts 91.175c & e, other references to include TERPS, paragraph 330c(2), the AIM, and the standard operations specification. ALPA believes that the actual MAP to threshold distance must be considered in computing the visibility minima for all approaches. Status: AFS-420 will staff internally and report next meeting. **Action:** Item Open (AFS-420)

MEETING 98-02: This issue was resolved in TERPS Change 17. It is FAA policy to always consider actual MAP-THLD distance in computing visibility minimums. **Status:** Item Closed.