

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

FAA Control # 98-01-207

SUBJECT: Procedures Being Developed Outside the FAA.

BACKGROUND/DISCUSSION: There is an increasing trend on the part of the FAA and ATA to use "Special Approach" procedures as a routine method of providing instrument approach procedures to air carrier airports. The people developing them at the carriers often have little TERPS knowledge. The ATA FMS Task Force Procedures WG is currently tracking the development of over 50 FMS procedures, 7 of which have been completed and approved for use. Some of the procedures are being discussed for release to the general public.

Our concerns include, who holds the liability for these procedures, but most of all the lack of expertise to develop the procedures in accordance with TERPS and other standards.

We believe carriers using unlicensed, and as a result, possibly unqualified personnel to develop procedures to be fundamentally flawed for the following reasons:

1. The special procedure concept was meant to provide an approach at specific locations where some unique feature or features prevented the use of standard criteria to develop a useable approach.
2. We still believe that the special procedure is an acceptable tool for the purpose which it is intended. We do not believe that it should be used to routinely develop approach procedures which could and should be developed utilizing standard development criteria which has been adequately tested and is published in the appropriate FAA technical directives.
3. We see the continued use of individual airlines developing their own approaches under non published and non-tested criteria to conduct approaches under routine operations at non terrain impacted airports as being an invitation to a non-standard system which is very difficult for crews to fly.
4. Many of these approaches are being developed by personnel who are not trained in instrument procedures development. We believe this to be a fundamental flaw and not keeping with the FAA practice of licensing personnel performing highly skilled technically demanding duties. We believe that if the FAA wishes to abdicate their responsibility to publish approach procedures at the major air carrier airports, they must also appropriately license those persons who will develop the procedures and then regulate these procedures development designers as they now regulate pilots, mechanics and designated engineering representatives.
5. We also believe that any special approach must pass a flight check flown to the same appropriate level of accuracy as a CAT II/III ILS by FAA Flight Check pilots. We believe the use of non TERPS trained POIs sitting on the jump seat indicating that it "looks pretty

good" to them is unacceptable in view of the very careful manner in which CAT II/III ILS was developed and is currently being operated.

6. It must also be recognized that when entities other than the US Government design and publish approach procedures they then become liable for the procedure. Currently the US Government assumes responsibility for all approaches they develop.

RECOMMENDATION: There needs to be a qualifications program for non-FAA procedures development specialists. With the FAA now allowing carriers to develop their own FMS, GPS and RNAV Procedures there is increasing concern about the fundamental and overall knowledge level of individuals developing these procedures. We are very concerned that essential elements of TERPS, Obstacle Clearance, Adequate Descent Gradient, Human Factors and other issues may be overlooked creating less than desirable and potentially unsafe approaches. We believe that the FAA must develop criteria and implement a qualification program for those individuals who will be developing FMS, GPS and other RNAV Approaches outside the quality control processes of the FAA. We believe the current FAA Designated Engineering Representative (DER) System provides an excellent role model for such a program. In reference to item number one in the background above, we recommend the FAA adopt the NTSB proposal given as a result of the Delta Flight 554 accident at La Guardia on Rwy 13, which occurred October 19, 1996 that recommended the FAA to develop and publish criteria and conditions for the classification of special airports. The resultant publication should include specific remarks detailing the reason(s) an airport is determined to be a special airport, and procedures for adding and removing airports from special airport classification. In addition, the FAA should develop criteria for special runways and/or special approaches taking into consideration any unique characteristics and special conditions at airports and include detailed pilot qualification/training/familiarization requirements for designated special runways or approaches.

COMMENT: This recommendation affects AFS in that it requires a program to be established and implemented to license and qualify non-FAA procedure specialists. This should result in an expedited approval process by AVN, of procedures developed by someone other than themselves. It also requests development and implementation of criteria to designate special airports, runways and approaches.

Submitted by: Captain Tom Young, Chairman
Charting and Instrument Procedures Committee

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April 22, 1998

INITIAL DISCUSSION (MEETING 98-01): ALPA believes there is tendency, on the part of the FAA, to use "Special Approach" procedures as a routine method of providing instrument approach procedures to air carrier airports. They are under the impression that individuals not adequately TERPS qualified have some part in "Special Approach" procedure

development. Howard Swaney, AFS-420 stated that he does not believe there is a sanctioned FAA program to allow development of instrument approach procedures by any unqualified person or agency. There has been some preliminary work to explore the possible development of a program allowing procedure development by non-government agents, in response to a congressional inquiry. To date, there is no approved program for non-government procedure development. AFS-420 will review current practices to ensure there is no validity to ALPA's claim. ALPA is requested to provide additional (more specific) information relating to this matter. **Status: Item Closed.**