



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**OCT 16 2017**

Captain Mark Bradley  
Chairman  
Performance-based Operations  
Aviation Rulemaking Committee (PARC)  
1030 Delta Boulevard  
Atlanta, GA 30354-1989

Dear Captain Bradley:

Thank you and the PARC for the recommendations on procedure design and operational guidance for Required Navigation Performance (RNP) to Instrument Landing System (ILS) (October 5, 2015) and RNP to Ground Based Augmentation System (GBAS) Landing System (GLS) and Localizer Performance with Vertical Guidance (LPV) (April 4, 2017).

Some procedure design recommendations are already incorporated into published directives. For example, FAA Order 8260.58A, U.S. Standard for Performance Based Navigation Instrument Procedure Design, paragraph 1-2-5.c (2), addresses RNP to ILS recommendation #4. Likewise, appendix C partially addresses RNP to ILS recommendations 1a and 1b. We agree to incorporate RNP to ILS design recommendation #3 after developing new Obstruction Evaluation Area (OEA) construction standards. The remaining recommendations will be incorporated into FAA Order 8260.58A with anticipated publication of October 2018.

Based on recent concerns raised by industry regarding pilot workload and the availability of vertical guidance when conducting simultaneous approaches, we request that the PARC Navigation Working Group review operational considerations that mitigate operational risk to ensure aircraft can safely transition from RNP to xLS guidance. Factors that may be evaluated include, but are not limited to, the availability and necessity of vertical guidance, pilot workload required to transfer between guidance modes, potential benefits of a longer straight final approach segment, and risks associated with dual/parallel operations.

If you have any questions, please contact Mark Steinbicker, Manager, Flight Technologies & Procedures Division, at (202) 267-8805.

Sincerely,

Ali Bahrami  
Associate Administrator for Aviation Safety