



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

Mission Support Services  
800 Independence Avenue, SW.  
Washington, DC 20591

MAY 08 2014

Ms. Margaret T. Jenny  
President  
RTCA, Inc.  
1150 18th Street, NW  
Suite 910  
Washington, DC 20036

Dear Ms. Jenny:

Thank you for the RTCA report "*Mitigations of Obstructions within the 20:1 Visual Area Surface*", approved by the Tactical Operations Committee in February 2014. The FAA found the report helpful. Our responses are organized below under the same four issue areas and recommendations used in the report.

**Recommendation 1 Timeframes:**

**Absent special circumstances, the listed timeframes for verification, planning, and mitigation of obstacles penetrating the 20:1 surface appear to be appropriate as limits to bound FAA's basic direction of "as soon as possible," but should be reassessed within 180 days of the effective date of the FAA 20:1 Memorandum.**

**Response:**

We concur. The FAA conducted a 180-day reassessment in April 2014. The reassessment team has suggested that the timeframe structure outlined in the FAA 20:1 Memorandum be retained. An updated FAA 20:1 guidance memorandum is being prepared and anticipated this Summer.

**Recommendation 2 Verification Stage Scope:**

**New obstacle surveys should not be required in the verification phase.**

**Response:**

We concur. We will include guidance to this effect in an updated FAA 20:1 guidance memorandum that is being prepared.

**Recommendation 3 Compliance Plan Guidance:**

**The FAA should provide guidance on compliance plan contents, scope, etc. Ideally, this would be in the form of a sample compliance plan. These plans should be able to include a full range of options for obstacle mitigation including obstacle elimination/lowering, obstacle lighting, use of visual aids (e.g., Vertical Glide Scope Indicator, infrastructure modifications), and acceptance of procedural restrictions.**

Response:

We concur. The compliance plan format, scope and mitigation plan information will be included in the Airport Graphic Information System (GIS) tool that is currently undergoing evaluation and is scheduled for release in Summer 2014. Information and access to the GIS tool will be widely disseminated as it becomes available.

**Recommendation 4 Outreach Efforts:**

**Outreach efforts regarding 20:1 surface clearance requirements are critical to successful implementation of a risk-based mitigation strategy and should include stakeholder organizations such as: Air Line Pilots Association (ALPA), Aircraft Owners and Pilots Association (AOPA), Airlines for America (A4A), Airports Council International-North America (ACI-NA), American Association of Airport Executives (AAAE), Cargo Airline Association (CAA), International Air Transport Association (IATA), National Association of State Aviation Officials (NASAO), National Business Aviation Association (NBAA), National Air Transportation Association (NATA), and Regional Airline Association (RAA) as recipients of FAA messaging and as potential partners in the outreach efforts. Key messages that need to be included in these outreach efforts include (1) the rationale behind the FAA's current focus on 20:1 obstacle clearance, (2) the scope and scale of 20:1 penetration issues within the NAS, (3) the safety and access impacts of 20:1 Penetrations, and (4) verification, compliance, and mitigation requirements outlined in FAA's 20:1 Memorandum.**

Response:

We concur. The FAA plans future outreach regarding the importance of 20:1 surface clearance requirements and values the suggestions noted above. Previous outreach has included several meetings with the National Association of State Aviation Officials (NASO), State Aviation, and the Aeronautical Charting Forum. Further, the Office of Airports has sent information notifications to all National Plan of Integrated Airport Systems (NPIAS) airports. The FAA also briefs at the Regional Airspace and Procedure Team (RAPT) monthly meetings in each of the regional offices. RAPT membership includes a core of FAA, military, and non-governmental organizations, as well as representatives as needed, from other entities such as airport operators and users.

**Additional Recommendations****The FAA should:**

**Continue its safety risk assessment of the 20:1 visual surface area using recent flight track dispersion data to determine if the geometry of the area should be modified.**

Response:

We concur. The Airport Obstruction Standards Committees (AOSC) has initiated a study to determine the appropriate dimensions of the visual area associated with instrument approach procedures and anticipates results by the end of this calendar year.

**Provide data requested by the VAS Task Group regarding the number of 20:1 visual surface area penetrations in the NAS and the details regarding them as requested by**

**the VAS Task Group co-chairs to the FAA. These data are important to provide industry with insight into the scale and scope of 20:1 penetration issues.**

Response:

We concur. The data regarding the number of 20:1 visual area surface penetrations are planned to be included in the Airport GIS tool scheduled for release in Summer 2014.

Sincerely,

A handwritten signature in blue ink, appearing to read 'EL Ray', written in a cursive style.

Elizabeth L. Ray  
Vice President, Mission Support Services  
Air Traffic Organization