

Mr. Rick Marinelli  
Federal Aviation Administration, Office of Airport Safety and Standards  
Airport Engineering Division, AAS-100  
Room 621  
800 Independence Avenue, SW.  
Washington, DC 20591.

September 15, 2008

RE: Federal Register Vol. 73, No. 162, August 20, 2008:  
“Notice of Policy Regarding Runway Closures During the Winter Season” and  
Draft Advisory Circular 150/5200-30C, Airport Winter Safety and Operations

Dear Mr. Marinelli:

On behalf of our members we offer the following comments on the above referenced draft advisory circular.

General Comment:

ACI-NA opposes the efforts of FAA to use this advisory circular to implement requirements that should be implemented through a regulation. Paragraph 1 (Purpose) of the coversheet to this AC states, “This advisory circular (AC) provides guidance to assist airport operators.” However, Paragraph 5-5 (Requirements for Runway Closures) provides, “The following circumstances require the prescribed action by the airport operator.” (emphasis added). By making the actions in Paragraph 5-5 mandatory for airport operators, FAA is engaging in a rulemaking that should be subject to the normal process of notice, review, and public comment. Incorporating these mandatory requirements in this advisory circular is an inappropriate substitution for rulemaking.

General Comment:

This draft advisory circular introduces the use of the term “MEDIUM”, instead of “FAIR”, when describing pilot reports of braking action (PIREPS). Because the term “FAIR” is used in several other FAA publications (FAA Order JO 7110.65, paragraph 3-3-4a and advisory circulars AC 150-5200-28), an explanation of FAA’s intent to harmonize the use of the term “MEDIUM” with ICAO terminology should be provided.

Paragraph 1.3 – Snow Control Center (SCC):

Although the intent of this paragraph is advisory, some of our members have interpreted the language as a mandatory requirement that large airports set up a SCC in a special room or facility. Several large airport report that their SCC consists of operations vehicles equipped with wireless computers and other equipment that fulfills all the requirements of an SCC in mobile facilities. In order to clarify we suggest the following language change. Delete the second and third sentences and replace them with:

“The airport operator should evaluate their winter operations and staffing to determine what type of SCC to establish. Examples of an SCC are special rooms or facilities, a “snow desk” in a maintenance building or a command vehicle of the duty operations officer which is properly equipped with suitable advanced communications equipment.”

Paragraph 1.6 – Airfield Clearance Times:

Despite the draft’s attempt to clarify that this paragraph intends to only provide guidance for equipment planning, not for operational snow clearing requirements, the later discussion in paragraph b introduces the concept of an “action initiating condition” in relationship to snow accumulation, which reinforces the notion of a snow removal performance criteria. We suggest that paragraph b be revised to make it clear that no time limits for snow removal are intended and that the guidance is only for purposes of equipment planning and determining AIP eligibility for snow removal equipment.

Paragraph 4.2, Sec 2, 6 – Glide Slope Critical Ground Areas:

This paragraph adds a requirement for issuance of a NOTAM by the “owner” upon receipt of two consecutive pilot reports of glide slope malfunction. In most cases the “owner” is the FAA Airways Facilities organization. It is inappropriate to require airports to issue NOTAMS on behalf of Airways Facilities. This provision should be removed.

Paragraph 5.2a – Conditions Acceptable To Use Decelerometers Or CFME To Conduct Runway Friction Surveys On Frozen Contaminated Surfaces:

The statement that “data obtained from such runway friction surveys are generally considered to be reliable when the surface is contaminated under any of the following conditions” needs to be strengthened to clearly convey that use of such data is prohibited in all but the stated conditions. We suggest changing the word “generally” to “only”.

Paragraph 5.5 – Requirements for Runway Closures:

The practice of immediately closing a runway upon receipt of a NIL PIREP is almost universally observed by airports. However, mandating such closure in this advisory circular and requiring the airport operator to determine when aircraft braking performance is no longer NIL, begins to change the basic responsibility of airport operators from that of accurately describing contaminant type and depth, to attempting to estimate airplane and aircrew performance. Furthermore, it is not clear that the risk posed by a NIL PIREP from a B-737 aircraft operating on a 6500 foot runway is comparable to a similar PIREP by a turboprop aircraft operating on the same runway, or that a PIREP from a crew unfamiliar with winter operations should be compared with a PIREP from a crew having substantial familiarity with winter operations. It is our understanding that this requirement is driven by the FAA Flight Standards Service determination that operations on runways reported as having NIL braking are always inherently unsafe and must be prohibited. While we prefer to not have such absolute directives applied to such highly variable circumstances, if FAA sees fit to require such language, we recommend the following change to the first bullet:

“Because the FAA Flight Standards Service has determined that operations on runways reported as having NIL braking are always inherently unsafe, a single NIL pilot braking action report (PIREP) requires that the runway be closed before the next operation. The runway must remain closed until a runway condition assessment indicates that the NIL condition no longer exists”

Our members have raised concerns about ambiguity in the third bullet of this paragraph, which states:

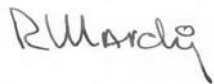
“Untreated wet or melting ice on at least 10 percent of the center 60 feet of the runway surface requires that the runway be closed and the icy areas treated before the next operation.”

The statement is unclear as to how the 10% is measured and whether it applies to the entire runway length, or only to the one-third segments for which friction results must be reported. This statement should be revised to clarify this confusion.

Finally, we understand the urgency of revising this advisory circular but note that it will be extremely difficult to implement and receive approval for the required changes to ACM's and SICP's in time for this upcoming winter snow season. The advisory circular should contain language making it clear that the changes contained in this draft should be implemented as soon as is reasonably practical.

Thank you for the opportunity to comment on this draft advisory circular.

Sincerely,

A handwritten signature in black ink that reads "R Marchi". The signature is written in a cursive, slightly slanted style.

Richard Marchi  
Senior Advisor, Policy and Regulatory Affairs