

AAAE Ops/Safety/Planning Committee

AAAE Committee Report, Annual Edition January 6th, 2008

INTRODUCTION

The purpose of this report is to provide the Board members of the AAAE an overview of the issues, discussions, and briefings that have taken place under the Operations, Safety, and Planning (OSP) Committee throughout calendar year 2007. The majority of these discussions have taken place during the Committee's bimonthly conference calls. Subsequent reports to the Board throughout the year will be updates with a comprehensive annual report again being prepared in January of 2009.

This report is divided into the following sections:

- **Ongoing Discussions** [Issues or topics the Committee considers of high enough import to require ongoing updates]
 - *Implementation of Safety Management Systems at U.S. Airports*
 - *Legislative Initiative to Preempt FAA's NPRM Process on new Requirements for ARFF Response*
 - *A/C 150/5200-30B Airport Winter Safety and Operations*
- **Other Topics and Issues Reviewed** [Issues, topics, or briefings the Committee has heard over the course of the year]
 - *Painting, Marking, and Lighting of Vehicles – Draft FAA AC [January]*
 - *Taxiway Centerline Light Amber/Green Color Coding [January]*
 - *Meeters and Greeters Beyond TSA Security Checkpoints [January and March]*
 - *Updated Runway Protection Zone (RPZ) Standards [March]*
 - *100% Belly Cargo Screening Legislation [March]*
 - *ASDE-X and Ground Vehicle Transponders [May]*
 - *Future Airport Capacity Study, 2007-2025 (FACT 2) [July]*
 - *Transportation Research Board (TRB) – Airport Cooperative Research Program (ACRP) [July]*
 - *FAA's Digital NOTAM Concept of Operations [September]*
 - *Airport Cooperative Research Program (ACRP) Project Oversight Panel Nominations [September]*
 - *Very Light Jets (VLJs) in the National Airspace System [November]*
 - *Airport Badging & New TSA Procedures [November]*
- **Committee Business**
 - *Committee Operations for 2008*
 - *Conference Call Participation*
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ONGOING DISCUSSIONS

Implementation of Safety Management Systems at U.S. Airports

The FAA Office of Airports continues to move forward with the implementation of safety management systems at all Part 139 certificated airports in the U.S. and it has been established that SMS practices will be extended to ramp vehicles. Originally expected in September of 2007, the FAA has postponed issuance of the formal NPRM in October, 2008. AAAE submitted compiled airport comments to the FAA

on their draft Advisory Circular on January 16th. One of the concerns raised by mid-size airports is the TSA's self-extension of involvement in the development and incorporation of SMS at airports. Another common theme was the multi-jurisdictional layers of government that may have interest or involvement as well as their own safety reporting standards.

At the June 10th AAAE Board Meeting, the OSP Committee Chair continued to give full support to the implementation of the SMS program and advised that the Committee will be watching developments, particularly in the airport pilot program, carefully. From subsequent discussions during the AAAE Annual Conference in June, it was evident that some airports remain to be convinced of the benefits of SMS. Earlier this year, the volunteer airport program was finalized which is expected to play a major role in defining program development and implementation. The following 23 airports are participating:

Austin-Bergstrom, Concord Regional Airport, Daytona Beach, Detroit Metro, Dubuque Regional, Guam International, Jacksonville (FL), Jackson Municipal (MS), Lexington - Blue Grass, Orlando International, Pittsburgh - Allegheny County, San Antonio International, Santa Maria Public, Seattle-Tacoma, South Bend Regional, Tallahassee Regional, Boston-Logan, Baltimore (BWI), Indianapolis International, Minneapolis-St. Paul, Providence, Springfield (IL), Toledo

The SMS Program Objectives include:

- an audit of the safety system,
- a gap analysis to benchmark existing systems against the new requirements to identify needed improvements,
- defining treatment of activity in non-movement areas,
- identifying or resolving issues with competing interests.

Most airport sponsors have finalized contracts with consultants, received their grants (if applied for), and are proceeding with the gap analysis. In addition, the Transportation Research Board recently published "Safety Management Systems for Airports, Volume 1: Overview". FAA has also activated their collaborative web site allowing airports shared access to developing information at:

http://www.faa.gov/airports_airtraffic/airports/airport_safety/safety_management_systems/

On our most recent conference call, a representative from Sea-Tac Airport, provided some preliminary observations on the implementation of the pilot program there. They cautioned that it is easy to get caught up in researching the subject and that FAA's Office for SMS [Darryl Adams] has been very helpful in providing guidance. In terms of developing the "Gap Analysis", their approach has been to develop a matrix of current responsibilities or "who is driving what"; i.e. defining where airline programs extend, then defining where Part 139 currently extends, and then determining what is left that is not covered by either. She also noted that the Occupational, Health, and Safety Administration's (OSHA) gap analysis will be posted on FAA's SMS web site.

FAA has started to receive gap analyses reports from airports who started early. The 2008 implementation schedule remains on track and their airport survey has been approved.

Legislative Initiative to Preempt FAA's NPRM Process on new Requirements for ARFF Response

Prior to the FAA issuance of an NPRM in the fall of 2008, the International Association of Fire Fighters (IAFF) was pressing to include new Aircraft Rescue and Fire Fighting Standards in the House version of the FAA reauthorization bill. If enacted into law, the proposal would dramatically increase equipment and staffing requirements for airports around the country. AAAE and ACI-NA have joined together and sent a letter to leaders on the House Transportation and Infrastructure Committee that urges them to reject to the IAFF proposal and to bring the formal NPRM process to a conclusion.

While this is not really a new issue, it has not received the attention or urgency it deserves, particularly with legislators whom have shown varying degrees of legislative awareness for their particular areas. However, airlines have now begun to pick up on the issue primarily because of their realization of the

potential impacts to their landing fees. On the last OSP Conference call, James Freeman [AAAE] gave the following update to call participants:

The manager's amendment, offered by Rep. James Oberstar (D-MN), the Chairman of the Transportation and Infrastructure Committee, is a mixed bag for airports on Aircraft Rescue and Firefighting Standard (ARFF). On one hand, AAAE was successful in their efforts to convince lawmakers to reject the initial proposal by the IAFF and the AFL-CIO's Transportation Trades Department to force airports to comply with excessive National Fire Protection Association (NFPA) standards.

Along with airports from around the country AAAE argued that the IAFF proposal would dramatically increase ARFF staffing, training and equipment requirements at airports with minimal input from the FAA, airports, other aviation stakeholders, and the general public. AAAE pointed out that the additional operating costs associated with these new requirements would force many small airports to raise their fees and make it more difficult for them to retain and attract new commercial air service.

Rather than forcing airports to comply with these proposed standards, the provision in the manager's amendment calls on the FAA to complete the rulemaking process instead. This is similar to the approach that airports recommended. However, the manager's amendment goes beyond AAAE's proposal by requiring that the final rule "address" proper staffing, vehicle deployment, response times and other labor proposals. More importantly, it would require the FAA issue a final rule "to the extent practical" that is consistent with those standards. As such, the door has been opened for the FAA to consider options beyond what the stakeholders recommend. In short, the ARFF provision contained in the manager's amendment is a far better than IAFF's initial proposal. However, AAAE still has concerns regarding the latitudes given towards possible labor initiatives.

The Senate version of the bill does not include any ARFF provisions. As such, the language can be modified in conference. Again, with labor initiatives forthcoming, this may be challenging. AAAE will continue to work the issue as the process continues.

This subject continues to remain a priority for the OSP Committee.

A/C 150/5200-30B Airport Winter Safety and Operations

On September 5th, the FAA issued the new AC on Winter Safety and Operations. It appears that some of the comments made to FAA on the draft were not incorporated into the final release. It also appears that there is some question as to what had to be accomplished within the 30 minute timeframe outlined in the AC and the ability of airports to meet that commitment in terms of staff and equipment. Some smaller airports noted that they may need substantially more of both resources in order to do so, while the larger airports in the "snow belt" seemed more comfortable with meeting the commitment with current resources. The circular also seems to imply that the 30 minute timeframe applies to only one runway and it's associated taxiways. However, the OSP Committee is currently recommending that each airport check with their FAA Certification Inspector and have them approve their approach to meeting the guideline.

This is a new subject coming before the committee and will be followed up on in subsequent conference calls.

OTHER TOPICS AND ISSUES REVIEWED

The following is a summarized version of additional topics and issues discussed during OSP conference calls in chronological order during 2007. For copies of the more detailed call notes and agendas, please contact James Freeman.

Painting, Marking, and Lighting of Vehicles – Draft FAA AC [January]

Numerous questions have been raised as to the application and clarity of the standards in the draft AC. It is apparent that many manufacturers are not familiar with the existence of the FAA circular pertaining to this topic. Apparently the standards will now be mandatory, not advisory, and have clarified the type of vehicles to be included, which now extends to airline vehicles. However, airports have little control over airline vehicles in this regard and questions have been raised as to the origins of the specifications cited and manufacturer familiarity or capability to comply; particularly with beacon requirements. It has also been suggested that the standards may only need to be applied movement areas.

Other questions and clarifications have also been raised in regard to applicability of the draft AC and the new/revised standards. For example, the issue of conflicting requirements for vehicles owned by municipalities or broader agency requirements. Airports are concerned that the AC would be viewed as an FAA mandate and override those requirements. There was also some concerns that the AC appeared to apply only to new vehicles and did not mean to imply remarking or equipping of existing fleets. It has been noted, however, that it was only required at Part 139 Certificated airports. At the same time, clarification is needed to understand whether the intent of the AC was to apply to vehicles acquired with AIP funds OR airports who receive AIP funds. The AAAE has submitted compiled comments on behalf of member airports.

Taxiway Centerline Light Amber/Green Color Coding [January]

The recently updated version of FAA's Advisory Circular AC 150 5340-30B contains discussion on the applicability and use of the amber/green color sequence for use with taxiway centerline lights. The AC now requires that the application of this lighting sequence be extended to other defined "critical" areas (ILS, Localizer, etc.). It is the position of the AAAE that this is unnecessary.

Meeters and Greeters Beyond TSA Security Checkpoints. [January and March]

TSA is testing whether it can ease policies that bar "non-flying" public beyond passenger security points. DFW and DTW ran test programs to verify the validity of the concept. Potential ramifications at some airports could include an assessment of impacts to passenger queuing versus increased retail revenue and the costs associated with increased TSA staffing levels. It should be noted that the DFW and DTW programs were very airport specific. DTW's program is specifically geared for their hotel guests at a hotel screening check point. Pittsburgh said that they have a Non-Ticketed Individual (NTI) initiative that is only used occasionally for special events. If such a program is under consideration, airports should carefully assess their specific situation in terms of their O&D and connecting mix and meeter-greeter per passenger ratios.

Airports have noted that, if the initiative moves forward en masse, it could become an important issue for customer service and consistency across the country. Given that public perception typically puts airports at the forefront of these issues, it was strongly recommended that this issue remain on the AAAE agenda.

Updated Runway Protection Zone (RPZ) Standards [March]

Change 11 to the Airport Design Guide (AC 150-5300-13) was promulgated by the FAA on March 28th, 2007 to clarify Runway Protection Zone (RPZ) standards. The updated standards may have potential implications for airports with development in the RPZ, especially for those with parking that may believe it to be grandfathered. Specifically, lingering confusion about whether or not the Object Free Area (OFA) should be extended and how far it goes has been eliminated. The new language clearly states that the "object free area extension" extends through the entire RPZ, but is now referred to as "the central portion of the RPZ".

In addition, it has now been reinforced that parking will not be allowed in the “central portion of the RPZ”. In direction to FAA ADO’s, FAA HQ stated that this should be rectified when the operator has an opportunity to change the land use and that “Difficulty in finding alternatives to parking in prohibited areas is not a sufficient justification for approval of a modification to standards.” Finally, the AC change clearly prohibits any fuel facilities that could be located within the RPZ.

100% Belly Cargo Screening Legislation [March]

Both chambers of Congress have introduced legislation that would require 100% screening of belly cargo. These new standards were recommended by the 9/11 Commission as a part of their review of overall aviation security. Both bills, HR 1 and S.509, require full implementation by 2009, or three years after enactment. This level of air cargo screening is unprecedented and the impacts to airside, landside, and cargo terminal operations are unclear. Many airports will likely incur impacts to future facility plans and/or development properties. The Senate version of the legislation went to the floor on Feb. 27th, 2007.

ASDE-X and Ground Vehicle Transponders [May]

The FAA has recently received media attention regarding runway incursions and the speed with which airport ground fleets are being equipped with transponders that can be tracked by the “new” ASDE-X radar system. However, the core issue currently being dealt with concerns resolving current and future transponder frequency use. Essentially, the FAA has been working to resolve these issues, both internally and with the FCC. The FAA is hoping to submit an expedited rulemaking for transponders on the current 1090 (ASDE-X) frequency, until such time as the 978 (ADS-B) frequency and electronics are available. The best case scenario is that 1090 transponders will be approved in the next 3 to 4 months. However, the transponders would still need to be manufactured and certified by both the FAA and FCC. Timeframes for this are unclear. At the same time newer ADS-B transponders (978 Hz) will be ready for deployment in approximately three years. This leaves some airports with the decision to invest in equipping now without knowing with any certainty what the disposition of the 1090 equipment will be when 978 transponders become available. In addition, some airports have taken the position that they will not deploy the transponders if they cannot be used in the non-movement area. The reason for this position is unclear at this time.

Future Airport Capacity Study, 2007-2025 (FACT 2) [July]

The FAA gave the Committee a briefing on the FAA’s recent FACT 2 study. The 56 airport study (the 35 Operational Evolution Partnership (OEP) plus 21 additional airports). It was noted that the study had a narrower focus than the detailed capacity analyses conducted for specific airports and did not include such elements as taxiway crossings or airspace conflicts with other airports.

Two different demand projections were used to generate the Annual Service Volumes - - the more traditional FAA Terminal Area Forecast and Mitre’s bottom up forecasting tool, FATE (Future Air Traffic Estimator). Airports were then assessed against four criteria to arrive at those airports that were considered highly impacted, most of these being on the east coast. It was also noted that, while the TAF carried current fleet mixes through by wake vortex categories, FATE was used to adjust for the influence of Very Light Jets (VLJs). In terms of funding, FAA is looking toward hands on fixes and evaluating whether funding can be reprioritized rather than getting new sources.

The basic conclusions of the study were that 18 airports will need additional capacity by 2015, and 27 airports by 2025. Where capacity constraints cannot be solved with a new runway because of geographic limitations, it has been suggested that congestion management is a likely solution. Next steps come in the following year include an evaluation of 15 highly impacted metropolitan areas to identify a toolbox with feasible solutions. The Committee Chairs have requested that the OSP Committee be involved with the next steps for the FACT study.

During the call, FAA also gave an overview of the FAA's OEP program and "Next Gen" initiatives which show considerable promise for help in alleviating some capacity constraints. While there have been some significant changes to the OEP program, there are still 3 major domains with 35 airports. However, they have added metropolitan areas similar to the FACT study with commercial service and GA airports. From there, they will build toward a list of airport improvements. The Joint Planning and Development Office (JPDO) uses OEP to track Next Gen improvements and will integrate the program with the FACT findings. FY 2008 funding seeks to combine existing pilot programs such as CAPSTONE, ADS-B, and RNP under one source.

Transportation Research Board (TRB) – Airport Cooperative Research Program (ACRP) [July]

The TRB through their ACRP is undertaking numerous research efforts on behalf of airports to advance our industry with a common understanding in leading developments. They currently have 70 active projects including legal and "quick response" papers. They invited Committee members to submit research topics for ACRP consideration as well extending the invitation to Committee members to volunteer to participate on evaluation panels. TRB also noted that the ACRP offers a mechanism to find innovative ways to address capacity needs in the mega-coastal regions. For example, how best to use slot controls on either side of the country. The Chairs offered to assist TRB by disseminating relevant ACRP information to its committee members.

FAA's Digital NOTAM Concept of Operations [September]

Gary Bobik of FAA's Aeronautical Information Management, gave the Committee an overview of FAA's Concept of Operations (ConOp) for modernization of the NOTAM system. The ConOp calls for a candidate NOTAM to be digitally submitted directly from the airport or FAA technical operations authority. If the candidate NOTAM passes automated quality assurance and validation, the FAA can immediately issue the NOTAM. The system is expected to be fully in place by 2009. Airports will have direct input into the system bypassing Flight Service Stations and avoiding third party handling. FAA has been working with five airports (Anchorage, Albuquerque, Memphis, Charleston, and Colorado Springs) to test the system with runway information only. Issues with the volume of NOTAMS that the FAA had before going digital have been eliminated. Each airport will tailored menus specifically for their airport.

Gary also pointed out that local or "L" NOTAMS will be eliminated and there will be more focus on NOTAM writing standards in ICAO format and rules for publication such as requiring the use of standardized key words and abbreviations. He stressed that accuracy will be key and brevity should be a goal. It is anticipated that the new digital NOTAMS will be available in graphical displays directly on flight decks around the 2010 time frame.

While some of the details and protocols are still being worked out, it is the intent to deploy one workstation for every airport operator along with the tools to enter the information through the website. However, FAA will need to address questions regarding procedures if an operator does not have access to a workstation. For example, if the operator is out on a runway. At the same time, many of the protocols or procedures used for establishing the "persons qualified" to author the NOTAMS at an airport can remain effectively the same.

In a follow up question, Gary noted that they have not yet, but will be, working on a mechanism to enter data for commissioning a new facility (e.g. a new runway) which isn't in the FAA's database yet in order for it to be on the pull down menu prior to the airport having to issue a NOTAM for the new facility. Gary also advised that the implementation date has been revised and that the new policy with the elimination of local NOTAMS and the start of keywords and NOTAM D's is now expected to be December 3, 2007.

Airport Cooperative Research Program (ACRP) Project Oversight Panel Nominations [September]

The Transportation Research Board through the ACRP is undertaking numerous research efforts on behalf of airports to advance our industry with a common understanding in leading developments. FY 2008 projects have now been selected and the oversight committee has issued a call for nominations of

individuals to participate in oversight panels for specific projects with expertise directly relevant to the research proposed. Nominations were requested by no later than September 17, 2007. Self-nominations are accepted. Michael Cheyne [OSP Chair] emphasized the importance of airports becoming more involved in the ACRP process, particularly in the area of proposing research topics. Historically, consultants have been the leaders in suggesting topics.

Very Light Jets (VLJs) in the National Airspace System (NAS) [November]

Faye Morrison of the GAO joined the call to provide highlights their recently released report on Very Light Jets (VLJs). The report focused on four study areas; 1) Forecasts, 2) Capacity, 3) Safety, and 4) Affects on NAS Funds.

On forecasts, GAO looked at eight forecasts that they considered to very credible. Six of the eight suggested that anywhere from 3,000 to 7,000 VLJs would enter the system between 2016 and 2025. The forecasts had ranges of optimism associated with them largely dependent on the predictability of the number of VLJs that would enter into the air taxi market.

Findings on capacity were less conclusive. There did not appear to be universal agreement amongst the 20 experts from NASA and MIT. Most seemed to agree that impacts to major hubs would be minimal. However, impacts in metropolitan areas with shared airspace and satellites were much less clear. While GAO acknowledged the degree of uncertainty involved, they did not feel that impacts to the system would be significant.

In terms of safety, GAO reported that the FAA was very confident that the systems for processing the new entries were already in place. However, FAA did note that they had some degree of concern for first time users of the VLJs. GAO also noted that FAA is predicting incremental introduction of the VLJ. While FAA has a staffing plan for inspectors to address the issue of VLJs, GAO had some question about their ability to implement it.

Finally, affects on the impact to NAS funding will be highly dependent on what the VLJ may replace or if the VLJ will represent a new component in the airspace. In conclusion, GAO noted that it was too soon to predict with any certainty due to the unknowns involved with the ultimate use of the VLJ (e.g. air taxi or private) and the range of the market entry forecast.

To a question raised on insurance requirements, GAO responded that insurance companies are working closely with the manufacturers on training requirements and that the manufacturers are taking it very seriously. On forecasts, GAO noted that FAA's forecasts called for an incremental system entry level of 400 to 500 VLJs per year which GAO said is being met and exceeded. As such, GAO recommends close monitoring of the numbers especially in terms of FAA's certification inspector staffing plan which GAO believes to be somewhat optimistic.

Airport Badging & New TSA Procedures [November]

Wendy Reiter, Director of Security at Seattle-Tacoma International Airport (Sea-Tac) joined the call to give the committee an update on badging issues at their airport. Late in 2006, the TSA issued a Security Directive advising that a new Security Threat Assessment would be coming in 2007. On October 1, 2007 the new procedures went in to full effect. However, Wendy noted that the system experienced difficulties and as such, many airports were now experiencing delays of two weeks in processing badges. In discussions with TSA at the time, there seemed to be no consistent method for returning results primarily due to technology issues with the database. Wendy noted that delays have been reduced now to about 72 hours with some as long as five days. TSA appears to acknowledge the issues as is working with the airport on system status and follow-up process.

COMMITTEE BUSINESS

Committee Operations for 2008

Due to their success, the Co-Chairs will continue with the bimonthly conference calls following pertinent issues with OSP Committee members. The conference calls have proved to provide a convenient method of information exchange and can be used as a forum to address issues that require expeditious handling. The Chairs will decide on a case-by-case basis whether to supplement the calls with “live” meetings during AAEE national events or conferences.

Conference Call Participation

Since the issues conference in January, 2007 the Committee has conducted 6 conference calls with 56 individuals participating over the year. Participation in the calls continues to be between 20 to 30 members representing a range of airports from small to large hubs, consultants, and other industry trade groups or government agencies. Participation in the calls is strongly encouraged to capture the broadest range of expertise on issues as possible.

The Co-Chairs also endeavor to procure guest speakers during the calls in order for the participants to get information directly from the source. The following were the guest speakers for our 2008 calls:

Pat Clancy, SEA Manager of Airport Certification, on Painting, Marking, and Lighting of Vehicles

Gary Bobik, FAA Aeronautical Information Management, on Digital NOTAM Concept of Operations

Chief Alvy Dodson, Vice President/Director, DFW Airport Public Safety on Meeters and Greeters Beyond TSA Security Checkpoints.

Faye Morrison, Government Accountability Office on Very Light Jets (VLJs) in the National Airspace System (NAS)

David Fish, FAA Project Manager, National Airports Division on Future Airport Capacity Study

Wendy Reiter, Port of Seattle’s Director of Aviation Security on Airport Badging & New TSA Procedures

Bob David, Senior Program Officer, Transportation Research Board on Airport Cooperative Research Program (ACRP)

2008 Conference Call Schedule

During the November conference call, the Committee Chairs confirmed with participating members that the schedule over the last year was appropriate. As such, the 2008 OSP Conference Calls will be held on the **first Thursday of every second month from 12:00 – 1:00 Eastern time**. The 2008 schedule is as follows:

January 3 rd	12:00-1:00 Eastern	July 3 rd	12:00-1:00 Eastern
March 6 th	12:00-1:00 Eastern	September 4 th	12:00-1:00 Eastern
May 1 st	12:00-1:00 Eastern	November 6 th	12:00-1:00 Eastern

Call-in information is provided with the agenda about one week before the call. Members are invited to submit issues for discussion to the Co-Chairs at any time through James Freeman.