



Washington Airport Management Association

Washington Airport Management Association Planning Report, May 2008

INTRODUCTION

The purpose of this report is to provide the AAAE Board members a summary of discussions that have taken place under the Operations, Safety, and Planning (OSP) Committee during the Committee's bimonthly conference calls. The OSP Committee will be having a live meeting with call-in capability on June 10th, 8:00 am to 9:00 am [EASTERN TIME] during the AAAE Annual Conference in New Orleans.

**WAMA Members are encouraged to participate at the meeting or on the conference call.
Call-in Number: 1-877-239-6389 - Conference Code: 649880 #**

This report is divided into the following sections:

- **Position Statements** [Statements of position or recommendations to be considered for action by the AAAE Board of Directors]
 - *Mandatory Pilot Training For Ground Operations – Summary (full statement appended to this report)*
- **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]
 - *FAA's EB-75. Incorporation of Runway Incursion Prevention into Taxiway and Apron Design [January]*
 - *Runway Safety Call to Action – Airport Driver Training Requirements. [January and March]*
 - *GAO Report 08-29 "Aviation Runway and Ramp Safety – Sustained Efforts to Address Leadership, Technology, and Other Challenges Needed to Reduce Accidents and Incidents." [March]*
 - *TSA's Certified Air Cargo Program [March]*
- **Committee Business**
 - *Committee Operations for 2008*
 - *Conference Call Participation*
 - *2008 Conference Call Schedule*

POSITION STATEMENTS

Requiring Mandatory Pilot Training for Ground Operations

Our Committee is proposing the following recommendation for Board consideration:

The Committee recommends that the AAAE Board of Directors direct AAAE staff to undertake the research and investigative work necessary for the Board to make a decision on whether to adopt an industry position to support and advocate for mandatory, recurrent pilot training for ground operations movement and airport sign and markings recognition. Such research should include discussions with FAA, aviation stakeholders, and/or industry experts.

A copy of the full transcript of the Position Statement has been appended to the end of this report.

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. Recent information now suggests that the Notice of Proposed Rulemaking may be postponed again until sometime in 2009. Keri Lyn Spencer has stepped in as FAA's new Manager for SMS as Darryel Adams has moved on to other opportunities.

FAA advised, since the Draft AC was published last year, they have received numerous comments and made adjustments to the Draft AC. There are 25 airports participating in the SMS pilot program, 20 of which are receiving AIP grants to do the work. One of the work elements of the pilot program is to conduct a "Gap Analysis". Of the completed analyses received, common themes included:

- o Not having an existing safety policy,
- o Not having extensive enough documentation, and
- o The lack of a safety reporting system.

At the same time, many of the analyses have found that the SMS program guidelines supplement existing programs. FAA cautioned participating members to keep the SMS Program documentation separate from the Airport Certification Manual at this time. Last year, the Transportation Research Board (under the ACRP program) published a report on SMS. They will soon be publishing an additional report specifically for small airports.

Extensive information can be found on SMS and the Pilot Program on FAA's collaborative web site at:

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

In March, Seattle-Tacoma International Airport coordinated a roundtable discussion with Dallas-Ft-Worth International hosting the event. Approximately 40 people attended including FAA representatives (Darryel and Keri Lyn amongst them) and representatives from 17 participating pilot airports. In addition, the AAEE/ACI SMS conference has been scheduled for July 14-15 and the tentative location is Baltimore. Finally, Al Stuart [OSP Co-Chair] is hosting the SMS Session at the Annual Conference in New Orleans. Keri Lyn has confirmed her participation.

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

AAEE Staff has advised the Committee that there is nothing new since the FAA reauthorization bill is still stalled in the Senate over the debate on how to pay for ATC modernization. In addition, it seems increasingly unlikely that the Senate will pass a reauthorization bill any time soon, so it is not expected that the firefighter proposal contained in the House version of the bill, which somewhat favored the NFPA standards, will go anywhere this year. On a related note, there has been no word on Capitol Hill that would suggest that the firefighters are proposing any new legislative proposal tied to the ICAO standards.

Committee members also have noted that there are two draft FAA AC's out for comment. They are Draft AC 150/5200-31B, Airport Emergency Plan (AEP) and Draft AC 150/5210-14B, Airport Fire and Rescue Equipment, Tools and Clothing. There have been some significant changes to the AEP and both documents embrace further acceptance of NFPA standards, which is something for airports to be cautious about, or at the very least be cognizant of what they're accepting.

On a different note, AAEE Staff confirmed that FAA Headquarters has asked their Regions to conduct a survey of airports to determine the impact of adopting an ICAO standard for ARFF. The standard would require airports to provide ARFF index coverage based on the aircraft operating at the airport and would do away with the requirement/exception for an average of 5 daily departures (FAR Part 139.315 and

139.317). For example: If the airport is a "B" Index for ARFF and Allegiant Air begins operations of two flights per week with an MD-83, the Airport would then be required to add resources to cover "C" Index. As such, all airports can expect to, or already have been surveyed by their respective FAA Regional Offices as to their current ARFF indices as compared to the ICAO standards. However, it remains unclear as to whether or not this is connected to the workings of the IAFF Congressional initiative to accelerate implementation of ICAO standards or just gearing up for FAA's own NPRM process.

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

On September 5th, 2007, the FAA issued the new AC on Winter Safety and Operations. To address some of the questions of Committee participants regarding interpretation of the guidelines, the OSP Committee has recommended that each airport check with their FAA Certification Inspector and have them approve their approach to meeting the guideline.

In addition, some airports, particularly smaller facilities, continue to have difficulty with the "30 minute" clearing guideline. In addition, questions were raised as to the accountability of the advisory nature of the "guideline" as opposed to a regulatory mandate. Once again, the Committee recommends that, for those having difficulty, to re-write their snow plans in consultation with and getting approval from their respective FAA Regional Offices. That then should be the accepted "standard" for their airport.

OTHER TOPICS AND ISSUES REVIEWED

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

FAA's EB-75. Incorporation of Runway Incursion Prevention into Taxiway and Apron Design

The FAA recently released an engineering brief to provide guidance on design strategies for taxiways and aprons to help prevent runway incursions. John Dermody from the New York Airports District Office, and principal author of the brief, gave the Committee an overview of the evolution, significant findings, and intended use of the document. Essentially, it had come to FAA's attention that there was little discussion of runway incursion prevention in the current version of AC 150/5300-13 Airport Design Guide.

The Brief had several recommendations that will be incorporated into the re-write of the Design Guide. However, John stressed that the recommendations were not to be "cookie-cutter" standards and that they should be considered as best-practices when undergoing new development or trying to address hot-spots on current airfield layouts. In terms of improvements that should be considered:

- Look for ways to by-pass active runways to keep crossings to a minimum within existing or local the constraints.
- Consider locating crossings on the last third of the runway. Statistically, this has been shown to be an area of reduced risk.
- Where possible, reduce the expanse of pavement incorporated into the airfield layout.
- Keep intersecting taxiways at right angles to runways unless their primary purpose is intended for exiting.
- Consider potential impacts from other airport design surfaces. For example, an impact to a TERPS surface could cause a runway hold line to be located in a non-standard (thus unusual) location.

John suggested that many problem areas have been a result of incremental airfield development over long periods of time directed at capacity or operational issues. During the planning or design of new improvements or the planning of major airfield improvements, implementers should take a broader look

at the airfield as a whole in consideration of potential complexities and runway incursions and incorporate the "KISS" principle wherever possible.

John noted that the conclusions and recommendations of the Brief will be incorporated into a full re-write of the Design Guide which is expected to be completed in the next 18 months with a draft to be complete in September of this year.

Runway Safety Call to Action – Airport Driver Training Requirements.

The FAA's Fact Sheet Aviation Industry Responds to FAA's Runway Safety Call To Action released on October 22, 2007 seemed to suggest that airfield driver training requirements may be extended beyond the Movement Area to anybody with access to the airfield. In addition, the Draft FAA AC 150-5210-20-Ground Vehicle Ops was equally unclear with different interpretations coming from the FAA.

The final AC was published without making it mandatory to have driving training for those who have access to the AOA and requirements remained confined to the airport movement area. However, AAAE Staff had confirmed discussions with the FAA that suggested that such a requirement may be 2 ½ to 3 years in the future.

Other themes AAAE Staff reported on from the comments they received on the draft AC were:

- Support for recurrent training,
- More consideration for costs,
- The broad application to those with access to the AOA may not be cost-effective,
- The AC should reach a broader audience than just the airport operator, and
- More paint does not necessarily mean a safer environment

GAO Report 08-29 "Aviation Runway and Ramp Safety – Sustained Efforts to Address Leadership, Technology, and Other Challenges Needed to Reduce Accidents and Incidents."

Last November, the Government Accountability Office (GAO) released a report on runway and ramp safety at U.S. airports. Teresa Spisak and Bob Holman of the GAO joined the call to give the Committee an overview of their findings and conclusions. The following are the highlights of the discussion as Teresa and Bob moved through a slide presentation:

- The airports GAO visited with new technologies were San Diego, Long Beach, Spokane, Atlanta, Seattle, Boston, Burbank, and Newark.
- Incursion numbers and rates through FY 2007 have nearly reached the FY 2001 peak level which represents about 1 incursion per day.
- However, the number of "Serious Incursions" dropped by nearly 30% from FY 2006 to FY 2007.
- At the same time, the number of incursions for the first quarter of FY 2008 is about five times that for the same time period in FY 2007.
- It was noted that of the 57% of pilot errors shown, situational awareness was thought to be a significant contributing factor.
- GAO listed six immediate actions that can be taken to reduce the numbers. Controller fatigue was highlighted and it was noted that many controllers are regularly working six day weeks. In terms of minimizing runway crossings, Atlanta's perimeter taxiway was used as an example.
- Teresa and Bob closed by noting their overarching conclusion that FAA must return to giving runway incursions sustained attention and priority.

The GAO representatives then entertained several questions from the Committee members. In regard to mandatory training for pilots on ground maneuvering, GAO responded that FAA has seminars on the subject but it is not required. There was some discussion on whether or not ground transponders had been authorized for use by FAA. GAO noted that if they have not, they soon will be.

In terms of ramp safety and Safety Management Systems, from GAO's perspective, they felt that this was not getting much attention at the federal level. They felt that there was a lack of good data and information on the subject. They suggested that FAA needs to get a better handle on the data, plans in place, and perhaps work with OSHA. They also noted the recent IATA survey of ground handlers' initiatives with similar programs.

One member noted that FAA had recently changed the flight paths to solve a runway crossing issue. However, that solution violated the airport's noise program and the member suggested FAA needs to be sensitive to the implications of their actions. GAO acknowledged the sensitivity and suggested that each solution needs to be handled on a case-by-case basis and involve all stakeholders. They also acknowledged that space at and around an airport is an issue.

Finally, some members felt that the supposedly new issues had been talked about ten years ago and that, the reality is, little has been done in that timeframe. GAO reiterated their overarching conclusion that FAA needs to make the initiative a sustained effort and priority as it had back in those years in order to avoid the possibility of it languishing again.

For a copy of the GAO's PowerPoint slide show, contact James Freeman [AAAE Staff]. For access to the full GAO report, please go to the following link:

<http://www.gao.gov/new.items/d0829.pdf>

TSA's Certified Air Cargo Program

AAAE Staff gave the Committee the background, an overview, and an update on the program. After 9-11, legislation was passed giving TSA a mandate to implement 100% screening of all cargo shipped on passenger aircraft by August 2010.

Currently, just using "known shippers" has been determined as not acceptable to meet the 100% requirement and it has also been determined that K-9s cannot be the primary screening mechanism. It was noted that there are no "silver bullet" solutions yet, but the TSA's Certified Air Cargo Program is an effort to move screening up-stream in the supply chain so that all screening does not need to take place at the airport. Freight forwarders and manufacturers will be certified to screen boxes and components before consolidation with approved technologies, such as AT and canines.

TSA has introduced a pilot program which will include six to nine cities. Those identified to date are San Francisco, Chicago, and Philadelphia with others to be named in the near future. TSA is looking for volunteers to try out an array of methodologies including K-9s, x-ray (multi-dimensional), and explosive trace. It was also noted that TSA has the budget for and will fund these programs.

COMMITTEE BUSINESS

Committee Operations for 2008

The Committee has continued with the bimonthly conference calls for 2008 following pertinent issues with OSP Committee members. Live meetings, such as the one to be held at this conference, are scheduled as appropriate. 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 Co-Chairs welcome, and on occasion, members have invited guests from their agencies to "listen in" to the discussion.

Conference Call Participation

Since our annual report to the Board at the January 2008 Issues Conference in Hawaii, the Committee has conducted 2 conference calls with 35 individual members participating. 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, by members or visitors, 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 first two 2008 calls:

John Dermody, FAA Senior Program Manger on FAA EB-75: Incorporation of Runway Incursion Prevention into Taxiway and Apron Design

Darryel Adams, FAA Manager of Safety Management Systems on Safety Management Systems

Teresa Spisak and Bob Holman, Government Accountability Office, on GAO Report 08-29 "Aviation Runway and Ramp Safety"

2008 Conference Call Schedule

OSP Conference Calls are held on the first Thursday of every second month from 12:00 – 1:00 eastern time. The May call was cancelled in lieu of a live meeting and conference call at the Annual Conference in New Orleans. The July call agenda will include highlights of some of the Annual Conference sessions. The remaining 2008 schedule is as follows:

May 1 st	CANCELLED	September 4 th	12:00-1:00 Eastern
June 10 th	8:00-9:00 Eastern	November 6 th	12:00-1:00 Eastern
July 3 rd	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 directly to the Co-Chairs or at any time through James Freeman.

AAAE Ops/Safety/Planning Committee

Requiring Mandatory Pilot Training for Ground Operations

June 10th, 2008

PURPOSE

To seek concurrence from the AA AE Board of Directors that the AA AE should adopt an industry position to support and advocate for mandatory, recurrent pilot training for ground operations movement and airport sign and markings recognition.

BACKGROUND

A recent U.S. Government Accountability Office (GAO) report states as follows:

As the nation's aviation system becomes more crowded everyday, increased congestion at airports may exacerbate ground safety concerns. **GAO REPORT 08-29, NOVEMBER 2007**

Over the past several years, airport operators have invested millions of dollars in enhanced markings, lighting, signage, and training programs. The FAA requires that all Part 139 Certificated Airports in the U.S have mandatory, recurrent training for drivers having access to the airport moment area. In addition, many of those airports have drivers training programs for drivers with access to anywhere on the airfield. Discussions with the FAA have indicated that mandatory, recurrent training for all drivers with access to the airfield may be forthcoming in the next 2 ½ to 3 years.

While we understand that the FAA and some airlines have instituted voluntary programs, our committee has found no similar, consistent, requirement for recurrent or mandatory, training for ground maneuvering and sign and marking recognition amongst the pilot segment of the U.S. aviation industry. So, while we, the airport segment, spend resources on improving ground operations and signage, there is no assurance that one of the most frequent users of the airfield, the pilots, will be able to recognize the effort. The GAO Report goes on to say:

...runway incursions were caused by many different factors, including airport complexity, frequency of runway crossings, the amount of air traffic, miscommunication between air traffic controllers and pilots, a lack of situational awareness on the airfield by pilots, and performance and judgment errors by air traffic controllers and pilots. [emphasis added] **GAO REPORT 08-29, NOVEMBER 2007**

GAO also points out that FAA's data shows that 54 percent of incursions from fiscal year 2003 through fiscal year 2006 were caused by pilot errors, 29 percent were caused by air traffic controller errors, and 17 percent were caused by vehicle operator or pedestrian errors.

The smallest portion of runway incursions occurred amongst ground operators which can be attributed, in part, to the training programs they are required to undertake. At the same time, the largest portion occurred amongst pilots with one of the contributing factors being situational awareness on the airfield. There are no regulated, mandatory requirements for this segment to undertake training for ground maneuvering.

RECOMMENDATION

Our Committee recommends that the AA AE Board of Directors direct AA AE staff to undertake the research and investigative work necessary for the Board to make a decision on whether to adopt an industry position to support and advocate for mandatory, recurrent pilot training for ground operations movement and airport sign and markings recognition. Such research should include discussions with FAA, aviation stakeholders and/or industry experts.

While it may be desirable to address the specifics of training needs for different elements of the pilot community, it is the opinion of this Committee that development of a general statement of support for a pilot training initiative is tantamount.