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# National Transportation Safety Board

Washington, D.C. 20594

Office of the Chairman

JUL 26 2002

Docket Management System  
U.S. Department of Transportation  
Room Plaza 401  
400 Seventh Street, S.W.  
Washington, D.C. 20590-0001

Docket No. FAA-2002-12261 - 51

2002-12261-51  
JUL 26 2002

Dear Sir:

The National Transportation Safety Board has reviewed the Federal Aviation Administration's (FAA) Notice of Proposed Rulemaking (NPRM), "Reduced Vertical Separation Minimum in Domestic United States Airspace," which was published in 67 *Federal Register* 31920 on May 10, 2002. The notice proposes to permit reduced vertical separation minimum (RVSM) flights in the airspace over the contiguous 48 States and Alaska and that portion of the Gulf of Mexico where the FAA provides air traffic services. The FAA's intent is to enhance airspace capacity and to assist aircraft operators with saving fuel and time.

The Safety Board has reviewed the operational experience gained in oceanic and European airspace where RVSM procedures are already in use and notes that flight operations using RVSM appear to be well accepted and have presented no significant safety issues. The Board also notes that the FAA's interim guidance appears to effectively address operational issues of concern. However, the Board is aware of reports (from the United Kingdom's Civil Aviation Authority Safety Regulation Group and the Confidential Hazardous Incident Reporting Program) that suggest potential difficulties do exist with the implementation of the RVSM program and believes that the following issues warrant the FAA's attention during the program's implementation:

- Aircraft involved in RVSM operations have reported encountering moderate to severe turbulence while at varying distances behind and 1,000 feet below heavy jets. Aircraft flying at the altitudes covered by this NPRM may be operating near their performance limits, and recovery from en route wake encounters at these altitudes may be more critical and difficult to accomplish without losing altitude than recovery would be at flight level 290 or below. The Safety Board believes that, following RVSM implementation, the FAA should aggressively solicit and track reports of such incidents to ensure that any potential safety issues in this area are identified and addressed.

- European and United Kingdom air traffic control service providers have reported some instances of confusion over the RVSM approval status of specific aircraft and groups of aircraft belonging to particular operators. Because misunderstandings in this area may result in aircraft operating in conflict with FAA separation standards, the Safety Board believes that the FAA should develop and thoroughly test procedures for ensuring that pilots and controllers share a common understanding of RVSM status and equipment requirements.
- Controllers involved in initial RVSM operations have noted that the change in separation minima required revising long-established procedures and relearning the appropriate altitudes to use for various situations. Commenters remarked that in some cases, the time provided for training and familiarization was not sufficient to ensure adequate performance and that traffic management actions were required to limit traffic to acceptable levels. The Safety Board believes that the FAA should provide comprehensive simulator training to controllers before implementing RVSM procedures to ensure that they are familiar with changes to letters of agreement and other coordination procedures affected by RVSM procedures.

The Safety Board appreciates the opportunity to comment on this proposed rule.

Sincerely,

A handwritten signature in black ink, reading "Marion C. Blakey". The signature is written in a cursive, flowing style with a long, sweeping underline that extends to the right.

Marion C. Blakey  
Chairman