



*Kollsman Inc.*

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**March 21, 2003**

**Docket Management System  
U.S. Department of Transportation  
Room Plaza 401,  
400 Seventh St., SW.  
Washington, DC 20590**

**Reference:** Docket Number FAA-2003-14449, Notice No. 03-03

**Subject:** Comments about the NPRM concerning operations using an Enhanced Flight Vision Systems (EFVS)

Dear Mr. Les Smith,

The Kollsman Corporation would like to commend the FAA in the development a new operational regulation that improves safety, reliability, and efficiency of aircraft operations. The proposed rule will enable aircraft operators to use new technologies not accommodated for by the current regulations. New technologies such as EVS can offer significant safety enhancements and operational benefits over currently allowed technologies and therefore are prudent to allow installation and use.

Notwithstanding the immediate benefits of the proposed rule changes, to further improve the FAA's proposed new rule, Kollsman would like to propose modifications concerning operations for 121 and 135 type operations with regards to the requirements of flight visibility to begin the approach. Currently the FAA proposes that the operations under Part 121.651 and Part 135.225 will not be permitted to initiate the instrument approach if the reported visibility is less than that required for the approach.

Kollsman proposes that Part 135 and Part 121 operations equipped with a certified EFVS system be allowed to initiate the approach in weather conditions reported as low as 1200ft RVR or ¼ mile visibility. The proposed languages would read:

**135.225 IFR: Takeoff, approach and landing minimums.**

(a) No pilot may begin an instrument approach procedure to an airport unless --

(1) That airport has a weather reporting facility operated by the U.S. National Weather Service, a source approved by U.S. National Weather Service, or a source approved by the Administrator; and

(2) The latest weather report issued by that weather reporting facility indicates that weather conditions are at or above the authorized IFR landing minimums for that airport.

(b) No pilot may begin the final approach segment of an instrument approach procedure to an airport unless the latest weather reported by the facility described in paragraph (a)(1) of this section indicates that weather conditions are at or above the authorized IFR landing minimums for that procedure, *or the aircraft and crew are qualified and equipped with a certified EFVS and enhanced flight visibility is not less than 1200ft RVR or ¼ mile visibility.*



**121.651 Takeoff and landing weather minimums: IFR: All certificate holders.**

(c) If a pilot has begun the final approach segment of an instrument approach procedure in accordance with paragraph (b) of this section and after that receives a later weather report indicating below-minimum conditions, the pilot may continue the approach to DH or MDA. Upon reaching DH or at MDA, and at any time before the missed approach point, the pilot may continue the approach below DH or MDA and touch down if--

(1) The aircraft is continuously in a position from which a descent to a landing on the intended runway can be made at a normal rate of descent using normal maneuvers, and where that descent rate will allow touchdown to occur within the touchdown zone of the runway of intended landing;

(2) The flight visibility **or enhanced flight visibility** is not less than the visibility prescribed in the standard instrument approach procedure being used;

(d) A pilot may begin the final approach segment of a Category I precision approach procedure at an airport when the visibility is less than the visibility minimums prescribed for that procedure if that airport is served by an operative PAR and another operative precision instrument approach system, and both the PAR and the precision approach are used by the pilot, **or equipped with a certified EFVS**. However, no person may continue an approach below the authorized DA unless the requirements of §91.175 (l) of this chapter, or the following requirements are met: ....

(1) The aircraft is continuously in a position from which a descent to a landing on the intended runway can be made at a normal rate of descent using normal maneuvers and where such a descent rate will allow touchdown to occur within the touchdown zone of the runway of intended landing;

(2) The flight visibility **or enhanced flight visibility** is not less than the visibility prescribed in the standard instrument approach procedure being used; and

Kollsman's view is that the certification process of the technology, not operational restrictions, should facilitate the implementation of new technologies in the future and provide the FAA with appropriate means to regulate and insure safety of the new technologies.

The proposed modifications to the rule changes offer immediate benefits for Part 91, 121 and 135 operators with EFVS while still maintaining flight safety. In summary, Kollsman encourages the FAA to move forward with the implementation of the rule changes, which allow installation and use of the EFVS, without further delay and to open the door for Part 135 and 121 operators as well.

Sincerely,

Edward Popek  
Avionics Product Manager  
Kollsman Inc.