

TERMINOLOGY/DEFINITIONS

The changes in definitions and terminology can be expected to have significant impact on training materials and equipment manuals. Equipment design can also be affected. For example, the new definition of DH does not include Cat I approaches. However, there are controls, displays and dedicated annunciators in flight decks that use this term without the new distinction. This will cause consistency problems and potentially confusion for the crews

We recommend the NPRM language clearly address:

- (a) whether it is FAA intent that training manuals, equipment manuals, etc be revised to reflect the new definitions and terminology,
- (b) whether charts will now be revised to use these terms,
- (c) whether there will be strict compliance between the new definitions, the type of approach being flown, and all control/display functions,
- (d) whether new terminology requirements will be applied retroactively in any way, e.g., if existing equipment [without any modification] were to be applied to another certification.

NAVIGATION REQUIREMENTS

121.349(a) Navigation equipment requirements

- (a) Except as provided in para (c) of this section, no person may conduct operations under VFR over routes that cannot be navigated by pilotage, or operations conducted under IFR or over the top, unless the airplane used in those operations is equipped with at least two approved independent navigation systems suitable for the route to be flown and authorized in the certificate holder's operations specifications.

135.165(a) Aircraft navigation equipment requirements

- (a) No person may conduct operations under IFR or extended over-water unless the aircraft used in those operations is equipped with at least two approved independent navigation systems suitable for the route to be flown and authorized in the certificate holder's operations specifications.

The NPRM section-by-section discussion of proposed changes states that changes to the paragraphs above are intended to address GPS vulnerability. Without jam-proof GPS receivers, the NPRM suggests that two navigation systems relying solely on GPS are not considered independent. On many procedures today, GPS is a required NAV sensor. Additionally, some operators are required to have dual means of navigation. Therefore, the NPRM language does not support current operating procedures.

We recommend the NPRM clearly state how operators using GPS for dual independent navigation capability will comply with all existing regulations.

We also recommend that the NPRM clearly state whether there is any change to WAAS or LPV and their role in the NAS as a result of this proposed rulemaking.