

Docket No. SA-538

Exhibit No. 6-H

NATIONAL TRANSPORTATION SAFETY BOARD

Washington, D.C.

FAA response to NTSB staff questions (2 pages)

AFS-400 Response to NTSB question re: Birmingham-Shuttlesworth International Airport (BHM) Accident

**** Questions:** 5) Reference JO 6850.2, and Advisory Circular 150/5340-30: These documents both contain the phrase, "*The PAPI approach path must provide the proper TCH for the most demanding height group using the runway...*".

A) Is this meant to be strictly enforced or are exceptions allowed?

B) Explain how this proscription is enforced, and by whom (for instance, the PAPI on Runway 18 at BHM was owned and operated by FAA, and according to the referenced guidance, as installed, the PAPI TCH would be insufficient for Group 4 airplanes, yet the FAA air traffic controller cleared an A-300 for the approach). If not by Air Traffic Control, how does the FAA expect that this restriction would be enforced?

Answers:

A) The requirements of JO 6850.2 and AC 150/5340-30 with respect to PAPI height group criteria are not enforceable on operators or pilots. There is no regulation in CFR 14 parts 91 or 121 which would apply to the use of PAPI.

B) There are also no regulatory restrictions or FAA policies prohibiting the issuance of an instrument approach clearance based on the availability or conditions of a PAPI. CFR 14 section 91.103 does require a pilot to "... *become familiar with all available information concerning that flight.*" This would normally include the TCH for both the planned instrument approach procedure (IAP) and the respective PAPI on the landing runway. If the difference between the PAPI TCH and the aircraft's eye-to-wheel height is less than the normal wheel-to-threshold crossing height, it is the pilot's responsibility to fly a suitably higher glide path to ensure a safe landing. The fact that the BHM Runway (RWY) 18 PAPI was designed for height Group 3 aircraft does not restrict that RWY 18 from use by Group 4 aircraft. PAPI system design (glidepath angle, TCH, etc) is not an operator dispatch requirement. The PAPI is a visual approach aid that can provide visual approach guidance in the visual segment of an IFP. Again a PAPI is not required for instrument flight operations nor required for dispatch release, therefore enforcement requirements are not applicable.

There are several mechanisms to restrict an aircraft from landing on a particular runway. The first is airport infrastructure limitations, e.g., runway weight bearing capability or taxiway limitations. No airport infrastructure issues apply in this case. The second is aircraft performance, e.g., runway length requirements for landing. No known aircraft issues apply in this case. The third is weather conditions and the availability of a suitable instrument approach. The instrument approach must have minimums published for the particular aircraft category to enable the landing operation. In this case, since the A-300 is an approach category C aircraft, and the LOC RWY 18 approach has Category A through Category D minimums, the approach was allowable.

**** TCH = threshold crossing height, PAPI = precision approach path indicator**