Federal Aviation Administration

Memorandum

Date: SEP 2 4 2014

To: [redacted] Director, Air Traffic Operations
[redacted] Director (A), Western Service Center

From: [redacted] Director, Air Traffic Procedures, AJV-8

Subject: Interpretation Request Concerning Special VFR Aircraft Operations and Communication Release to a Common Traffic Advisory Frequency (CTAF)

We have reviewed your request for an interpretation of the requirements of Federal Aviation Administration (FAA) Order JO 7110.65, Air Traffic Control, Paragraph 4-8-8, Communication Release, as it pertains to Paragraph 7-6-11, Termination of Service, and Advisory Circular (AC) 90-42, Traffic Advisory Practices at Airports Without Operating Control Towers. The following is offered in response.

As stated in your interpretation request, Paragraph 4-8-8 addresses communications release for IFR aircraft landing at an airport not served by a tower or FSS. This paragraph does not include provisions for aircraft receiving IFR separation services such as SVFR or aircraft conducting practice instrument approaches. Additionally, FAA order JO 7110.65, Chapter 7, Visual, Section 5, Special VFR (SVFR) does not address communication transfer to a CTAF frequency. Since this interpretation request is for Anchorage Air Route Traffic Control Center (ZAN), Paragraph 7-6-11 is not applicable as Chapter 7, Section 6 is annotated as *TERMINAL*.

We contacted Aviation Safety, Flight Standards Service, AFS-800, General Aviation and Commercial Division, for their view on the retention of communications with an aircraft until after landing, whether the aircraft is operating IFR, SVFR or VFR. They expressed concern with this practice as it could impact the pilot's ability to accomplish the safety related actions outlined in AC 90-42. Even though ZAN has all aircraft operating within the surface area on their frequency, it is an uncontrolled airport and other surface operations may be occurring without the knowledge of the ZAN controller. These operations, such as runway checks, runway crossings, or runway light replacement, do not require a NOTAM and would be announced on the CTAF frequency. For this reason, it is our determination that arriving and departing SVFR aircraft must be advised to communicate on the CTAF frequency when operating on or near the airport.

We realize that this may cause an additional workload on the ZAN controllers and the pilots that operate out of the Class E Surface Areas within ZAN's airspace; however, safety must take precedent over efficiency. We also agree that visual separation is a valuable tool when SVFR operations are conducted. One solution to satisfy the transfer to CTAF requirement and still apply visual separation would be to advise pilots of aircraft equipped with dual communication radios to change to the advisory frequency and monitor the ZAN sector frequency. This technique could be applied to the lead aircraft when the pilot reports the airport in sight and would satisfy the requirement of Paragraph 7-2-1c to have direct communication with one aircraft and to have the ability to communicate with the other.

This interpretation cancels the one titled "Interpretation Request Concerning Order JO 7110.65, Paragraph 4-8-8, Communication Release and Applicability to Special VFR Aircraft", dated August 1, 2014. If you should have any questions, please contact [redacted] En Route Procedures Group, AJV-83, at [redacted]