Global reporting format and Part 139 Miscellaneous Amendments - (CD 2313AS)

Overview

Runway safety, particularly runway excursions, is one of the International Civil Aviation Organization's (ICAO) top aviation safety priorities. The third most common landing excursion risk factor is ineffective braking action, which can occur when there are contaminants on the runway such as snow, ice, slush or water. This risk factor is confirmed by the main aircraft manufacturers and the Flight Safety Foundation.

To address the issue, the ICAO Friction Task Force developed a new system for assessing and reporting runway surface conditions, known as the Global Reporting Format (GRF). GRF enables a harmonised assessment and reporting of runway surface conditions.

Over the last 18 months, the National Runway Safety Group (NRSG) has been looking at options for implementing the GRF in Australia. The working group has endorsed these new policy proposals for industry consultation.

The proposed GRF rule set

We are proposing amendments to the Part 91 and Part 139 Manuals of Standards (MOS) to align Australia with ICAO's GRF. The proposed GRF regulations seek to provide timeliness, uniformity and consistency in the assessment and reporting of runway surface conditions. This is necessary as it provides pilots and flight crew with the information to make informed decisions about using a runway that is wet or contaminated.

Recognising that GRF can be complex and expensive to implement, the proposed regulations aim to simplify the reporting format to ensure that the burden of assessment for aerodrome operators is reduced as much as possible, while still providing aircraft operators and pilots with the necessary operational information. Additionally, the proposed regulations allow for air traffic controllers to assess and report WET and DRY runway conditions at controlled aerodromes, subject to agreement, thus limiting the burden on aerodrome operators at the major airports in Australia.

The proposed GRF rules are intended to apply to all certified aerodromes with a sealed runway.

CASA will incorporate the adopted amendments into the Part 91 MOS and Part 139 MOS, based on feedback received via this consultation.

For more detail on the proposed GRF changes please read our summary of proposed change (SPC) on CD 2313AS.

Miscellaneous amendments

Outside of the GRF changes, we are also using this consultation to address a number of other amendments that we believe are necessary for improving the Part 139 MOS. Specifically, the consultation includes the following proposed changes:

- A definition for 'runway starter extension' would be added to the list of definitions in Section 3.01 of the Part 139 MOS.
- The standard for a chevron marking would be amended so that its ends must be not ***more*** than (as opposed
- CASA would be able to approve a temporary visual approach slope indicator system (VASIS), without requiring a flight check or exemption.
- Replace the requirement for CASA to exempt a temporary VASIS from the requirement for a flight check with the requirement for a CASA approval. This would still be subject to a safety assessment. The exemption process is unnecessarily burdensome for the requirements of the existing safety assessment.

- At a controlled aerodrome, an airside vehicle operating on a runway strip, a runway, a taxiway strip or a taxiway would be required to be equipped with (or escorted by a vehicle equipped with) a VHF radio capable of two-way communications with air traffic control (ATC), and the driver of the vehicle would be required to read back to ATC the safety-related parts of any ATC clearances or instructions transmitted to the driver by voice.

For more detail on these miscellaneous changes please read our SPC on CD 2313AS.

Previous consultations

Prior to the release of this consultation, CASA has consulted internally and externally via the NRSG GRF Implementation Working Group, consisting of representatives from CASA and the airlines, pilot and airport associations, aerodrome operators, airport consultants, Airservices Australia and the Department of Defence.

CASA previously consulted GRF policy in late 2022 in PP 2211AS - Proposed implementation of ICAO's Global Reporting Format. This policy was a more restricted implementation. Further internal and external consultation determined a wider applicability to all certified aerodromes was desirable and achievable.

As a result of these consultations, alterations and additions were made to the draft MOS proposals.

Why your views matter

Your feedback will help us make sure the proposed requirements are suitable, the final legislation is clear and it will work as intended.

Please submit your comments using the survey link on this page.

If you are unable to provide feedback via the survey link, please email regulatoryconsultation@casa.gov.au for advice.

Documents for review

All documents related to this consultation are attached in the ‘Related’ section at the bottom of the overview page. They are:

- SPC on CD 2313AS, which provides background on the proposed standards
- Consultation Draft - Part 91 Manual of Standards (Global Reporting Format) Amendment Instrument 2023 (No. 2)
- Consultation Draft - Part 139 Manual of Standards (Global Reporting Format and Miscellaneous Amendments) Instrument 2023
- Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0 - Global reporting format – Runway surface condition.
- MS Word copy of online consultation for ease of distribution and feedback within your organisation.

What happens next

At the end of the response period, we will:

- review all comments received
- make responses publicly available on the consultation hub (unless you request your submission remain confidential)
- publish a Summary of Consultation which summarises the feedback received and outlines any intended changes and next steps.

All comments received on the proposed legislation will be considered. Relevant feedback that improves upon the proposed instrument will be incorporated into the final instrument.

Post-implementation review

CASA will monitor and review the new rules during the transition phase and on an ongoing basis.

Give Us Your Views [Appears on the overview page at the bottom]

Online Survey [This link is on the front page of the survey and takes you to the survey questions]

Related [This section is at the bottom of the front page]

Related Documents
List of documents attached to the consultation:

- Summary of proposed change – CD 2313AS
- Consultation Draft - Part 91 Manual of Standards (Global Reporting Format) Amendment Instrument 2023 (No. 2)
- Consultation Draft - Part 139 Manual of Standards (Global Reporting Format and Miscellaneous Amendments) Instrument 2023
- Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0 - Global reporting format – Runway surface condition
- MS Word copy of online consultation - Global reporting format - Runway surface condition assessment and reporting (CD 2313AS)

Audience & Interest groups

Audience

- Aerodrome operator
- Air operators
- Airworthiness organisations
- Flight instructors and flight examiners
- Flight training operators
- Engineers
- Manufacturers
- Pilots
- Air traffic controller/s
- Foreign operator
- Air traffic service providers
- Part 175 of CASR Aeronautical information service providers
- Aviation Meteorology
- Forecaster/Meteorological service provider
- Operations Control/Flight Dispatch
- School/Education/Aviation Theory Provider
- Certified aerodrome owner/operator
- CASA aerodrome inspector
- Aerodrome industry consultant
- Aircraft owner/operator
- Subpart 21.J of CASR approved design organisation
- Flight training organisations
- Instructors and flight examiners

Interest

- Airspace and infrastructure
- Hazards
- Human factors
- Safety management systems
- Operational standards
- Aircraft certification and design
- Flight training
- Equipment standards
- Training and checking systems
- In-house training for CASA FOIs
- Safety promotion

Page. Consultation Contents

This consultation asks for your feedback on the proposed amendments to the Part 91 Manual of Standards (MOS) and the Part 139 MOS in relation to implementation of the Global Reporting Format (GRF) and its requirements for runway surface condition assessment and reporting. Additional miscellaneous amendments are included for the Part 139 MOS.

There are a total of 21 pages of questions and requests for comment in this consultation:

- Pages 2 – 3 request personal information and your consent to publish.
- Pages 4 – 15 comprise proposed policy and questions related to the GRF changes.
- Pages 16 – 20 comprise additional miscellaneous amendments to the Part 139 MOS.
- Page 21 comprises a request for feedback on the proposed GRF guidance.
- Page 22 provides an opportunity for general comments and any impact these changes may have on you or your operation.

The survey has been designed to give you the option to provide feedback on the survey in its entirety or to provide feedback on the policy topics applicable to you.

When you have completed the sections on which you wish to provide feedback, select the **'Finish'** button at the bottom right of this page.

18	CASA approval of temporary VASIS from requirement for flight check
19	Requirement for read back of ATC clearances and instructions by aerodrome personnel
20	Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0 - Global reporting format – Runway surface condition
21	General comments

Page 2. Personal information

First name

(Required)

Brian

Last name

(Required)

Greeves

Email address

If you enter your email address, you will automatically receive an acknowledgement email when you submit your response.

Email

Brian.greeves@ausalpa.org.au

Do your views officially represent those of an organisation?

(Required)

Please select only one item

☒ Yes, I am authorised to submit feedback on behalf of an organisation

☐ No, these are my personal views.

If yes, please specify the name of your organisation.

Australian Airline Pilots Association (AusALPA)

Which of the following best describes the group you represent?

Please select only one item

☐ Air transport operator
☐ Aircraft owner/operator
☐ Air transport pilot
☐ Other pilot
☐ Aerodrome operator
☐ Aerodrome consultant
☐ Air navigation service provider
☒ Other

Please specify 'Other' if selected.

Professional Pilots Association

Page 3. Consent to publish submission

To provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

- **your last name** if the submission is made by you as an individual or
- **the name of the organisation** on whose behalf the submission has been made
- **your responses** and comments

We **will not** include any other personal or demographic information in a published response

Do you give permission for your response to be published?

(Required)

Please select only one item

☒ Yes - I give permission for my response/submission to be published.

☐ No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

☐ I am a CASA officer.

Information about how we consult and how to make a confidential submission is available on our website <https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public>.

Page 4. Pilot reporting braking action not as good as expected

Key change

Add a requirement that the pilot-in-command (PIC) of an aircraft must report to air traffic control (ATC) after landing if the braking action experienced was not as good as that reported for the runway.

Question 1 – Do you agree with the proposed pilot reporting of braking action to ATC via an AIREP SPECIAL if braking action is not as good as expected?

Fact bank: Part 91 MOS; Section 21.05; Table 21.05(1); Item 12

Content:

After section 21.05, Table 21.05 (1), item 11

insert

12	Runway braking action encountered is not as good as reported	Runway braking action via AIREP SPECIAL

Note AIP ENR 1.1, Appendix 1 includes the template for the AIREP SPECIAL, including Section 3, item 9 — runway braking action.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This is a sensible proposal and may help to prevent a runway excursion by landing or departing traffic by landing aeroplane PIC reporting the actual runway condition.

Page 5. Take-off and landing performance – runway surface condition

Key change

Add a requirement that the pilot-in-command (PIC) of an aeroplane must, if available, take into account the runway surface and runway surface condition when determining take-off or landing performance. Take-off and landing performance already needs to be determined in accordance with the Aircraft Flight Manual (AFM), aircraft manufacturer's manual or Part 121 approved data.

Runway surface and runway surface condition may impact on take-off or landing distance. Not all Part 91 operations will be to certified aerodromes therefore it only needs to be taken into account if a Runway Condition Report (RCR) is available.

Question 2 – Do you agree that the Part 91 PIC needs to take into account the runway surface and runway surface condition if they are available?

Fact bank: Part 91 MOS; Subsections 24.02(3)(ab) and 25.02(3)(ab)

Content:

After subsection 24.02(3)(a)

insert

(ab) the type of runway surface, and the runway surface condition, if available;

After subsection 25.02(3)(a)

insert

(ab) the type of runway surface, and the runway surface condition, if available;

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Note that the words “if available” are included to protect the pilot. Nevertheless, air operators and aerodromes should do their best to make real time runway surface condition reports available to pilot.

Page 6. Transitional arrangements for implementation

Key change

Add a requirement that controlled aerodromes or certified aerodromes with scheduled Part 121 aircraft operations have up to 6 months to transition to the Global Reporting Format (GRF). Note that controlled or Part 121 scheduled air transport operations aerodrome operators can implement the GRF earlier than 13 June 2024 if they are ready.

Question 3 – Do you agree that 6 months is sufficient time for controlled aerodromes or certified aerodromes with scheduled Part 121 of CASR operations to implement runway surface condition assessment and reporting?

Fact bank: Part 139 MOS Amendment Instrument; Item 2; Commencement

Content:

2 Commencement

(1) This instrument commences on the day after it is registered.

(2) The amendments in Schedule 1 take effect on commencement.

(3) Despite subsection (1), an aerodrome operator for any of the following

(a) a controlled aerodrome; or

(b) an aerodrome where scheduled air transport operations in accordance with Part 121 of CASR are conducted;

must comply with each requirement that arises under an amendment in Schedule 2 by not later than 13 June 2024;

Note 13 June 2024 coincides with the publication of the AIP on an Aeronautical Information Regulation and Control (AIRAC) effective date.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)

☐ Undecided / Not my area of expertise

Comment

This was a compromise as it would result in around 95% of scheduled air transport services being covered. It will also allow the smaller aerodromes to train staff (AROs), whilst requiring them to provide GRF within 12 months.

Key change

Add a requirement that the remaining certified aerodromes have up to 12 months to transition to the GRF. Note that other certified aerodrome operators can implement the GRF earlier than 28 November 2024 if they are ready.

Question 4 – Do you agree that 12 months is sufficient time for all remaining certified aerodromes to implement runway surface condition assessment and reporting?

Fact bank: Part 139 MOS Amendment Instrument; Item 2; Commencement

Content:

2 Commencement

(1) This instrument commences on the day after it is registered.

(2) The amendments in Schedule 1 take effect on commencement.

(3) Despite subsection (1), an aerodrome operator for any of the following

(a) a controlled aerodrome; or

(b) an aerodrome where scheduled air transport operations in accordance with Part 121 of CASR are conducted;

must comply with each requirement that arises under an amendment in Schedule 2 by not later than 13 June 2024;

Note 13 June 2024 coincides with the publication of the AIP on an Aeronautical Information Regulation and Control (AIRAC) effective date.

(4) Despite subsection (1), an aerodrome operator for an aerodrome other than one mentioned in subsection (3) must comply with each requirement that arises under an amendment in Schedule 2 by not later than 28 November 2024;

Note 28 November 2024 coincides with the publication of the AIP on an Aeronautical Information Regulation and Control (AIRAC) effective date.

Radio buttons

☒ Agree

☐ Agree, with changes (please specify suggested changes below)

☐ Disagree (please set out your reasoning and alternative suggestions below)

☐ Undecided / Not my area of expertise

Comment

The aerodrome operators have been provided with sufficient time to implement GRF as the implementation date in Australia for these aerodrome will be 3 years after the ICAO implementation date.

Page 7. Runway surface condition definitions

Key change

Add Global Reporting Format (GRF) definitions for contaminant, runway condition assessment matrix (RCAM), runway condition code (RWYCC), runway condition report (RCR), runway surface condition descriptors and slippery wet runway.

Question 5 – Do you agree with the proposed definitions for runway surface condition descriptors, RCAM, RWYCC, RCR and slippery wet runway?

Fact bank: Part 139 MOS; Subsection 3.01(3)

Content:

After subsection 3.01 (2)

insert

(3) In addition to any relevant definitions contained in subsection (2), the following definitions apply for applicable provisions in relation to runway surface conditions:

contaminant means matter present on the surface of a runway that meets one or more of the following runway surface condition descriptors:

(a) **compacted snow**, being snow that has been compacted into a solid mass such that aeroplane tyres, at operating pressures and loadings, will run on the surface without significant further compaction, or rutting of the surface;

(b) **dry snow**, being snow from which a snowball cannot readily be made;

(c) **frost**, being frost that consists of ice crystals formed from airborne moisture on a surface whose temperature is below freezing;

Note 1 Frost differs from ice in that the frost crystals grow independently and, therefore, have a more granular texture.

Note 2 Below freezing refers to air temperature equal to or less than the freezing point of water (0 degree Celsius).

Note 3 Under certain conditions frost can cause the surface to become very slippery and it is then reported appropriately as reduced braking action.

(d) **ice**, being water that has frozen, or compacted snow that has transitioned into ice, in cold and dry conditions;

(e) **slush**, being snow that is so water-saturated that it will splatter if stepped on forcefully, or from which water will drain when a handful is picked up;

(f) **standing water**, being water of a depth greater than 3 mm;

Note By convention, running water of a depth greater than 3 mm is reported as standing water.

(g) **wet ice**, being ice with water on top of it, or ice that is melting;

Note Freezing precipitation can lead to runway conditions associated with wet ice in relation to aeroplane performance. Wet ice can cause the surface to become very slippery. It is then reported appropriately as reduced braking action in line with procedures in AC 139-22 v1.0 Global reporting format – Runway surface condition.

(h) **wet snow**, being snow that contains enough water content to be able to make a well-compacted, solid snowball, and from which water will not squeeze out.

Note A runway is contaminated when one or more contaminants are present on the surface of the runway.

runway condition assessment matrix or ***RCAM*** means a matrix for assessing the runway condition code from a set of observed runway surface conditions and the pilot in command's report on braking action.

runway condition code or ***RWYCC*** is the number used in a runway condition report to describe the runway surface condition.

Note The runway condition code allows the flight crew to make an operational aeroplane performance calculation. Procedures for the determination of the runway condition code are described in the AC 139-22 v1.0 Global reporting format – Runway surface condition.

runway condition report or ***RCR*** means a comprehensive standardised report relating to runway surface conditions, and their effect on aeroplane landing and take-off performance.

runway surface condition descriptors: see ***contaminant***.

slippery wet runway means a wet runway where the surface friction characteristics of a significant portion of the runway show that the runway is degraded.

Note These definitions are for use in relation to Global reporting Format.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Although this is not fully ICAO compliant, it provides a pragmatic definition for the Australian context.

Page 8. Aerodrome manual – procedures for runway surface condition inspections and reporting

Key changes

Add a requirement that the aerodrome manual must contain the procedures for carrying out aerodrome serviceability inspections in relation to assessing changes to the runway condition code (RWYCC) and runway surface contaminant types.

Add a requirement that the aerodrome manual must contain the procedures for assessing and reporting RWYCC and runway surface description to air traffic control (ATC), NOTAM Office and pilots.

Question 6 – Do you agree with the proposed addition in the aerodrome manual of procedures for runway surface condition inspections and reporting?

Fact bank: Part 139 MOS; Subsections 11.03(1)(b) and 11.05(1)(d)

Content:

Paragraph 11.03 (1) (b)

repeal and substitute

(b) both:

(i) conducting particular inspections, including the items to be inspected or checked; and

(ii) making changes to the RWYCC and runway surface contaminant types;

Paragraph 11.05 (1) (d)

repeal and substitute

(d) at controlled aerodromes — ATC of any hazards that may adversely affect aviation safety;

(e) ATC, AIS and pilots of relevant RWYCC and runway surface descriptions.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Adds the assessment and reporting requirements to the Aerodrome Manual.

Page 9. Aerodrome serviceability inspections – severe storms and periods of heavy or prolonged rainfall

Key change

An aerodrome serviceability inspection is already required following a severe wind event, a severe storm or a period of heavy rainfall. Amend the requirement so that inspections are only required when there are known aircraft operations (scheduled, anticipated or ongoing).

Add a requirement for an inspection after prolonged rainfall. These weather events are most likely to result in a wet, slippery wet or contaminated runway.

Question 7 – Do you agree with the proposed addition to the inspection requirement that it is only required if aeroplane operations are taking place or scheduled?

Fact bank: Part 139 MOS; Subsection 12.01(1)(a)

Content:

Paragraph 12.01 (1) (a)

repeal and substitute

(a) when aeroplane operations are scheduled, otherwise anticipated, or ongoing, and there has been a severe wind event, a severe storm, or a period of heavy or prolonged rainfall;

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This was introduced to clarify that the inspections are only required when there are known aircraft operations (scheduled, anticipated or ongoing). The latter 3 conditions were suggested by the legal drafters and seem to provide the necessary distinction. Q7-9 seem the same, but are asking slightly different questions related to inspections after a severe wind event, a severe storm, or a period of heavy or prolonged rainfall:

Q7. An inspection is only required if aeroplane operations are scheduled, otherwise anticipated, or ongoing.

Q8. Linking maintenance requirements in Chapter 18 in the event of pooling, ponding or poor drainage of water.

Q9. Inspections are not expected to be performed whilst weather conditions pose a safety hazard to aerodrome personnel.

Key change

An aerodrome serviceability inspection is already required following a severe wind event, a severe storm or a period of heavy rainfall. Amend the requirement so that inspections are only required when there are known aircraft operations (scheduled, anticipated or ongoing).

Add a requirement for an inspection after prolonged rainfall. These weather events are most likely to result in a wet, slippery wet or contaminated runway.

Add a note that if pooling or ponding of water, or poor drainage, occurs on a runway, the aerodrome operator needs to refer to Chapter 18 of the Part 139 Manual of Standards. for the maintenance requirements.

Question 8 – Do you agree with the proposed addition of a note linking the inspection to maintenance requirements in Chapter 18 in the event of pooling, ponding or poor drainage of water?

Fact bank: Part 139 MOS; Subsection 12.01(1)(a)

Content:

Paragraph 12.01 (1) (a)

repeal and substitute

(a) when aeroplane operations are scheduled, otherwise anticipated, or ongoing, and there has been a severe wind event, a severe storm, or a period of heavy or prolonged rainfall;

Note 1 If pooling or ponding of water, or poor drainage, is observed on a runway, remedial maintenance must be undertaken as soon as possible: see subsection 18.03.

Note 2 Aerodrome personnel are not expected to carry out an aerodrome serviceability inspection if weather events create a work, health and safety hazard, for example, if lightning in the area requires the movement area to be vacated.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Takes care of pooling and ponding and the need for remedial maintenance to address these issues.

Key change

An aerodrome serviceability inspection is already required following a severe wind event, a severe storm or a period of heavy rainfall. Amend the requirement so that inspections are only required when there are known aircraft operations (scheduled, anticipated or ongoing).

Add a requirement for an inspection after prolonged rainfall. These weather events are most likely to result in a wet, slippery wet or contaminated runway.

Add a note that the inspections are not required to be conducted if the weather conditions such as lightning in the area, could cause a WHS hazard to aerodrome personnel.

Question 9 – Do you agree with the proposed addition of a note stating inspections are not required if weather conditions pose a safety hazard to aerodrome personnel?

Fact bank: Part 139 MOS; Subsection 12.01(1)(a)

Content:

Paragraph 12.01 (1) (a)

repeal and substitute

(a) when aeroplane operations are scheduled, otherwise anticipated, or ongoing, and there has been a severe wind event, a severe storm, or a period of heavy or prolonged rainfall;

Note 1 If pooling or ponding of water, or poor drainage, is observed on a runway, remedial maintenance must be undertaken as soon as possible: see subsection 18.03.

Note 2 Aerodrome personnel are not expected to carry out an aerodrome serviceability inspection if weather events create a work, health and safety hazard, for example, if lightning in the area requires the movement area to be vacated.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

Protects aerodrome personnel as they are not required to carry out inspections in hazardous situations e.g. lightning in the vicinity.

Page 10. Aerodrome serviceability inspections – meteorological conditions may cause change to runway surface condition

Key change

Add a requirement that an aerodrome serviceability inspection is required when aircraft operations are scheduled, anticipated or ongoing, following weather conditions which might cause the runway condition code (RWYCC) to change or a runway surface contaminant to appear or change type.

Question 10 – Do you agree with the proposed addition of an inspection requirement if meteorological conditions could cause a change to the RWYCC or type of runway surface contaminant?

Fact bank: Part 139 MOS; Subsection 12.01(1)(d)

Content:

Paragraph 12.01 (1) (d), including the Note

repeal and substitute

(d) when requested by ATC (where applicable);

(e) when aeroplane operations are scheduled, otherwise anticipated, or ongoing, and meteorological conditions may have caused:

(i) the RWYCC to change; or

(ii) a runway surface contaminant type to be present, or to have changed.

Note CASA recommends that an additional aerodrome serviceability inspection should be carried out if a pilot or ARFFS provider reports a hazard.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

It is fundamental to the GRF scheme that the RWYCC and runway surface conditions, reported to the pilot, are as accurate and current as possible.

Page 11. Additional daily serviceability inspection for international Code 3 or 4 runways

Key change

Add a requirement for an additional daily aerodrome serviceability inspection for aerodromes with Code 3 or 4 runways at aerodromes with scheduled international air transport operations. They only need to be conducted if aircraft operations are spaced out by at least 6 hours to avoid, for example, requiring 2 inspections if there are only a few services operating daily, but are close together.

Question 11 – Do you agree with the proposed addition of an extra daily serviceability inspection requirement for aerodromes with scheduled international air transport operations on Code 3 or 4 runways, only if operations are at least 6 hours apart?

Fact bank: Part 139 MOS; Subsection 12.01(2)(c)

Content:

Subsection 12.01 (2)

repeal and substitute

(2) Without affecting the requirements under subsection (1), for an aerodrome with scheduled air transport operations:

(a) at least 2 aerodrome serviceability inspections must be carried out each week, with at least 48 hours between any 2 inspections; and

(b) at least 1 aerodrome serviceability inspection must be carried out on each day that an air transport movement is scheduled; and

(c) at least 2 aerodrome serviceability inspections must be carried out on each day that an international air transport movement is scheduled for a Code 3 or a Code 4 runway if at least 6 hours elapse between each air transport movement.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This was another compromise to ensure these inspections took place without placing an unnecessary burden on smaller aerodromes with limited traffic movements. Norfolk Island was given as an example.

Key change

Add a requirement that any aerodrome serviceability inspection carried out for one of the inspection requirements can then count as an inspection for another inspection requirement.

Question 12 – Do you agree with the proposed addition that any individual serviceability inspection carried out counts for any of the other inspection requirements?

Fact bank: Part 139 MOS; Subsection 12.01(2A)

Content:

After subsection 12.01 (2)

insert

(2A) An aerodrome serviceability inspection carried out to satisfy a requirement of a paragraph of subsection (2) may be used to satisfy a requirement of another paragraph of section (2).

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

This was to prevent duplication of inspections and make it easier for the aerodrome to meet its regulatory requirement, without reducing safety. In lay terms, it means that a “routine runway inspection” will also satisfy the GRF inspection requirements.

Page 12. Global reporting format and aerodrome serviceability inspection requirements

Key change

The applicability of this section on Global Reporting Format (GRF) is for all certified aerodromes with a sealed runway. The inspection, assessment and reporting requirements are only for an operational runway i.e., a runway in use at the time of the weather event or aftereffects of the weather e.g. standing water on the runway.

Question 13 – Do you agree with the proposed applicability of the GRF to all certified aerodromes with a sealed runway?

Fact bank: Part 139 MOS; Subsection 12.05(1)

Content:

12.05 Global reporting format and aerodrome serviceability inspection requirements

(1) Without affecting any other requirements under Chapter 12, the aerodrome operator of a certified aerodrome with an operational sealed runway (an ***operational runway***) must comply with each requirement mentioned in this section for the runway.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

AusALPA strongly supports the mandate be extended to all controlled aerodromes with an operational sealed runway as this increases safety and make Australia more compliant with the ICAO SARPs.

Key change

Add a requirement that any aerodrome serviceability inspection must also check for the presence of visible dampness, standing water, snow, slush, ice, or frost on an operational runway. Visible dampness meets the definition of a 'wet' runway. The check is only for an operational runway, active or in use when the runway surface condition exists, and not for the entire movement area.

Question 14 – Do you agree with the proposed addition that any serviceability inspections should also specifically check for presence of visible dampness (to indicate a runway is wet) or runway

surface contaminants?

Fact bank: Part 139 MOS; Subsection 12.05(2)

Content:

(2) An aerodrome serviceability inspection carried out for Chapter 12 must specifically check for visible dampness, standing water, snow, slush, ice, or frost on an operational runway.

Note In this section, snow, slush, ice, and frost of various kinds are described as "Other contaminants", to distinguish them from contamination by dampness or water.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This means that the operational runway is checked for contaminants as part of the routine inspection.

Key change

Add a requirement that an aerodrome operator must determine the applicable runway condition code (RWYCC) based on the associated runway surface description e.g. a WET runway is assigned a RWYCC of 5. The table provided for this RWYCC assignment is only for runways that are dry, wet, slippery wet or have standing water which are the prevalent conditions in Australia. This is supported by ICAO in Circular 355 which has a Runway Condition Assessment Matrix (RCAM) for WET and DRY runways only. Other contaminated runways with SNOW or FROST are treated separately as they are relatively rare conditions that apply to an extremely small number of certified aerodromes (e.g. Mount Hotham).

Question 15 – Do you agree with the proposed assignment of an RWYCC based on the runway surface description?

Fact bank: Part 139 MOS; Subsection 12.05(3)

Content:

Using runway surface description to determine the RWYCC

(3) The aerodrome operator must use the applicable runway surface description mentioned in Table 12.05(3) to determine the applicable RWYCC for an operational runway.

Table 12.05(3) — RWYCC

Using a runway surface description to assign a RWYCC	
For a runway surface description of: Column 1	**the applicable RWYCC is:** Column 2
DRY	**6**
WET (The runway surface is covered by any visible dampness or water up to and including 3 mm depth)	**5**
WET ("slippery wet" runway)	**3**
STANDING WATER	**2**

Note This RWYCC assignment table is in PANS-Aerodromes and includes WET and DRY conditions.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

All directly concerned (pilots, ATC, AROs etc.) should know that RWYCC 4 is available to indicate a downgrade from RWYCC 5. This is included in the AC and should be stressed in the training, including how it would work in practice.

Key change

Add a requirement that the wet or standing water runway condition report (RCR) must be made as soon as possible, but only if aeroplane operations are scheduled, anticipated or ongoing (i.e., no need to make reports if there are no aeroplanes using the runway).

Question 16 – Do you agree with the proposed reporting of runways that are wet or have standing water using the runway condition report (RCR), only when aeroplanes are operating or scheduled?

Fact bank: Part 139 MOS; Subsection 12.05(4)

Content:

Wet or standing water (but not slippery wet) — reporting

(4) When aeroplane operations are scheduled, otherwise anticipated, or ongoing, the aerodrome operator must report an operational runway that is wet or has standing water, as soon as possible in an RCR.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

This is to prevent unnecessary reporting whilst ensuring that aeroplanes that are “scheduled, otherwise anticipated, or ongoing” receive a Runway Condition Report.

Key change

Add a requirement that the format of the runway condition report (RCR) is the runway number followed by the runway condition code (RWYCC) for each third of the runway followed by the runway surface description for each third of the runway. The ICAO RCR format doesn't use the prefix 'RWY' in front of the runway number, however there are human factors issues associated with pilots reading a string of numbers in a NOTAM and not associating it with a runway. 'RWY' should precede the runway number. This will also facilitate searching in automated NOTAM processing systems for the keyword 'RWY' to quickly locate the most critical NOTAMs.

ICAO PANS-Aerodromes states that if 25% or less of a runway third is wet or covered by a contaminant, a RWYCC 6 shall be reported which is the same as for a DRY runway. We propose that if 25% or less of a runway third has STANDING WATER on it then it is to be reported as RWYCC 5 with a runway surface description of WET to indicate to pilots that the runway isn't dry, but isn't contaminated, either.

Also, if the depth of water is reasonably ascertainable, that is to be reported as well i.e. it is not expected that an aerodrome operator measures depth of water during or following a storm while a runway is actively being used by aeroplanes. However, following rain events which cause pooling or ponding of water, when the runway is not in use, an aerodrome operator may be able to measure the water depth, record it and be able to report it when the runway is in use during that runway surface condition.

Question 17 – Do you agree with the proposed RCR format for runways that are wet or have standing water? The proposed RCR format is:

- Runway number
- RWYCC and runway surface description for each runway third
- If 25% or less of a runway third has standing water, it is to be reported as RWYCC of 5 and WET
- If depth of standing water is available, that is also to be reported

Fact bank: Part 139 MOS; Subsection 12.05(5)

Content:

(5) The RCR must include:

(a) the relevant runway number; and

(b) subject to paragraph (c), for each identified one third length of the runway, the applicable RWYCC and runway surface description in accordance with Table 12.05(5); and

(c) if 25% or less, of a one third length of the runway has standing water on it — a RWYCC of 5 (WET) for the one third length; and

(d) if the depth of any standing water on the runway is reasonably ascertainable — a report of the depth of that standing water.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

1. The use of RWY preceding the number should help to reduce ambiguity.
2. This was a proposal from VA and seemed to be sensible inclusion. It does affect the runway performance figures, but not too adversely, whilst adding a safety margin.
3. This provides more information for the pilot and should assist assessing the runway condition more accurately.

Key change

Add a requirement that wet runway condition reports (RCRs) are to be reported to air traffic control (ATC), and if ATC is not available, to pilots. It may be possible for an aerodrome operator to report directly to pilots via UNICOM, CA/GRS or direct communications with the aircraft operator**, f**or example, mining companies that own the aerodrome or aerodrome reporting officers with VHF radios.

Standing water RCRs are to be reported to ATC, NOTAM Office and, if ATC is not available, to pilots, if possible.

Question 18 – Do you agree with the proposed reporting of wet runways or runways with standing water to ATC, NOTAM Office or pilots?

Fact bank: Part 139 MOS; Subsection 12.05(6)

Content:

(6) The RCR must be made to the relevant persons in accordance with Table 12.05(5).

Table 12.05(5) — Wet or standing water reports

For a runway surface description of: Column 1	**the applicable RWYCC is:** Column 2	**and the report must be made to:** Column 3
WET	**5**	(a) ATC (if available); or (b) if the ATC is not available — pilots, but only where the aerodrome operator has available UNICOM, or CA/GRS, or another direct means of communication.
STANDING WATER	**2**	(a) the NOTAM Office, and ATC (if available); and (b) if the ATC is not available — pilots, but only where the aerodrome operator has available UNICOM, or CA/GRS, or another direct means of communication.

Note UNICOM or CA/GRS services can be used to report an RCR if they are operating at the time of the runway surface condition. Direct means of communication can mean, for example, when the aerodrome operator is also the aircraft operator such as for certain mining companies, or when the aerodrome reporting officer can communicate directly with pilots via VHF radio.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

The reporting of standing water by NOTAM is compliant with ICAO, whilst the use of UNICOM, or CA/GRS, where available, to provide the RCR to pilots could prevent another overrun like the one that occurred at “Newman”.

Key change

Add a requirement, where there is an agreement at a controlled aerodrome between the aerodrome operator and air traffic control (ATC), for ATC to assess and report a runway or thirds of a runway as being WET or DRY, then the aerodrome operator does not need to make the report to ATC. ATCs are trained to assess runways as being WET or DRY in relation to Part 172 Manual of Standards requirements for selecting the runway in use.

Question 19 – Do you agree with the proposed arrangement that at controlled aerodromes, if there is an agreement in place between the aerodrome operator and ATC, ATC can make the assessment and reports for wet runways?

Fact bank: Part 139 MOS; Subsection 12.05(7)

Content:

(7) Despite subsection (4), if an agreement exists between the aerodrome operator and ATC for ATC to assess and report the runway or a portion of it when WET or DRY, the aerodrome operator does not need to make the RCR to ATC.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

AusALPA is pleased that AsA has agreed to provide this information. It is hoped that all controlled airports will sign an agreement with AsA to provide this service to pilots.

Key change

Add a requirement that the aerodrome operator must make 'SLIPPERY WET' runway surface friction reports as soon as possible, but only if aeroplane operations are scheduled, anticipated or ongoing. The runway is considered 'slippery wet' if:

- the aerodrome operator has assessed it as such due to previous experience when it is wet, or
- the aerodrome operator receives at least 2 reports from pilots for a wet runway of a MEDIUM braking action, or
- at least 2 reports from air traffic control (ATC) for a wet runway of pilots reporting a braking action of MEDIUM.

Wet runways are normally associated with a braking action of GOOD.

Question 20 – Do you agree with the proposed reporting of runways that are slippery wet only using the runway condition report (RCR), including if braking action reports of MEDIUM are provided from at least 2 pilots directly to the aerodrome operator or from ATC, only when aeroplanes are operating or scheduled?

Fact bank: Part 139 MOS; Subsection 12.05(8)

Content:

Slippery wet — reporting

(8) When aeroplane operations are scheduled, otherwise anticipated, or ongoing, an operational runway must be reported as soon as possible in an RCR if:

(a) it is slippery wet; or

(b) the aerodrome operator has received at least 2 pilot reports of MEDIUM runway braking action for the runway, or a portion of it; or

(c) the aerodrome operator has received at least 2 ATC reports of MEDIUM runway braking action for the runway, or a portion of it.

Note Pilot reports of runway braking action as MEDIUM, meaning a slippery wet runway surface, are based on pilot observations that braking deceleration is noticeably reduced for the wheel braking effort applied, or that directional control is noticeably reduced.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)

☐ Undecided / Not my area of expertise

Comment

Th most accurate information is required, particularly if the braking action has reduced to MEDIUM which could lead to a runway excursion.

Key change

Add a requirement that the format of the runway condition report (RCR) is the runway number followed by the runway condition code (RWYCC) for each third of the runway followed by the 'SLIPPERY WET' runway surface description for each third of the runway. ICAO requires 'slippery wet' runways to be reported as 'WET' with an RWYCC of 3 instead of 5.

There are human factors issues involved with pilots reading a NOTAM with 'WET/WET/WET' and not realising the hazard associated with reduced surface friction associated with part of the runway being slippery wet. Therefore, we are requiring the runway surface description 'SLIPPERY WET' to be used.

Additionally, due to the particular hazards associated with reduced runway surface friction for slippery wet runway surface conditions, the percentage of a runway third is to be reported as well. Guidance will be provided that the percentage increments are in multiples of 25. That is, 25%, 50%, 75%, 100%.

Question 21 – Do you agree with the proposed RCR format for runways that are slippery wet? The proposed RCR format is:

- Runway number
- RWYCC and runway surface description for each runway third
- The percentage of a runway third.

Fact bank: Part 139 MOS; Subsection 12.05(9)

Content:

(9) The RCR must include:
- (a) the relevant runway number; and
- (b) for each identified one third length of the runway:
  - (i) the applicable RWYCC and runway surface description in accordance with Table 12.05 (9); and
  - (ii) the applicable percentage extent of the slippery wet surface.

Radio buttons

☒ Agree
☐ Agree, with changes (please specify suggested changes below)
☐ Disagree (please set out your reasoning and alternative suggestions below)
☐ Undecided / Not my area of expertise

Comment

This RCR and RWYCC format (which differs from ICAO) should provide a clearer assessment of the runway condition provided adequate education is provided to pilots to understand the system.

Key change

Add a requirement that the aerodrome operator must make 'SLIPPERY WET' runway surface friction reports to air traffic control (ATC), NOTAM Office and, if ATC is not available, to pilots, if possible.

Question 22 – Do you agree with the proposed reporting of slippery wet runways to ATC, NOTAM Office or pilots?

Fact bank: Part 139 MOS; Subsection 12.05(10)

Content:

(10) The RCR must be made to the relevant persons in accordance with Table 12.05(9).

Table 12.05(9) — Slippery wet reports

For a runway surface description of: Column 1	**the applicable RWYCC is:** Column 2	**and the report must be made to:** Column 3
SLIPPERY WET	**3**	(a) the NOTAM Office, and ATC (if available); and (b) if the ATC is not available — pilots, but only where the aerodrome operator has available UNICOM, or CA/GRS, or another direct means of communication.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

As previous comments, the aim is to provide the most accurate descriptive information to pilots in real time using all communications available.

Key change

Add a requirement that an aerodrome operator must determine the applicable runway condition code (RWYCC) based on the associated runway surface description for otherwise contaminated runways, that is, that don't have standing water.

Question 23 – Do you agree with the proposed assignment of an RWYCC based on the runway surface description for otherwise contaminated runways?

Fact bank: Part 139 MOS; Subsection 12.05(11)

Content:

Other contaminants — using runway surface description to determine the RWYCC

(11) For other contaminants, the aerodrome operator must use the runway surface description mentioned in Table 12.05(11) to determine the applicable RWYCC for an operational runway.

Table 12.05(11) – Other contaminants – RWYCC

Using a runway surface description to assign a RWYCC for other contaminants	
For a runway surface description of: Column 1	**the applicable RWYCC is:** Column 2
FROST SLUSH (up to and including 3 mm depth) DRY SNOW (up to and including 3 mm depth) WET SNOW (up to and including 3 mm depth)	**5**
COMPACTED SNOW (Outside air temperature minus 15 degrees Celsius and below)	**4**
DRY SNOW (more than 3 mm depth) WET SNOW (more than 3 mm depth) DRY SNOW ON TOP OF COMPACTED SNOW (any depth) WET SNOW ON TOP OF COMPACTED SNOW (any depth) COMPACTED SNOW (outside air temperature above minus 15 degrees Celsius)	**3**
SLUSH (more than 3 mm deep)	**2**
ICE	**1**
WET ICE WATER ON TOP OF COMPACTED SNOW DRY SNOW OR WET SNOW ON TOP OF ICE	**0**

Note This RWYCC assignment table is in PANS-Aerodromes and includes SNOW and ICE conditions.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This is in line with ICAO PANS-Aerodromes. These “other contaminants” can happen in Australia, but are infrequent (at most aerodromes) compared with rain (i.e. water (WET) or standing water.) This Table completes the GRF RCR Matrix by covering other contaminants.

Key change

Add a requirement that the contaminated runway condition report (RCR) must be made as soon as possible, but only if aeroplane operations are scheduled, anticipated or ongoing (i.e., no need to make reports if there are no aeroplanes using the runway).

Question 24 – Do you agree with the proposed reporting of runways that are otherwise contaminated using the RCR, only when aeroplanes are operating or scheduled?

Fact bank: Part 139 MOS; Subsection 12.05(12)

Content:

Other contaminants — reporting

(12) When aeroplane operations are scheduled, otherwise anticipated, or ongoing, an operational runway that has other contaminants must be reported as soon as possible in an RCR.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Same comment as before…only required if an aeroplane is "scheduled, otherwise anticipated, or ongoing" but this time for "other contaminants".

Key change

Add a requirement that the aerodrome operator must make runway condition reports (RCR) for the remaining contaminated runway surface conditions. The format of the RCR is the runway number followed by the runway condition code (RWYCC) for each third of the runway followed by the runway surface description for each third of the runway. ICAO PANS-Aerodromes states that if 25% or less of a runway third is covered by a contaminant, a RWYCC 6 shall be reported which is the same as for a DRY runway. We propose that if 25% or less of a runway third has a contaminant on it then it is to be reported as RWYCC 5 with a runway surface description of WET to indicate to pilots that the runway isn't dry, but isn't contaminated, either. Also, if the depth of the contaminant is reasonably ascertainable, that is to be reported as well.

Question 25 – Do you agree with the proposed RCR format for runways that are otherwise contaminated? The proposed RCR format is:

- Runway number
- RWYCC and runway surface description for each runway third
- If 25% or less of a runway third is contaminated, it is to be reported as RWYCC of 5 and WET
- If depth of the contaminant is available, that is also to be reported.

Fact bank: Part 139 MOS; Subsection 12.05(13)

Content:

(13) The RCR must include:

(a) the relevant runway number; and

(b) subject to paragraph (c), for each identified one third length of the runway, the applicable RWYCC and runway surface description in accordance with Table 12.05(11).

(c) if 25% or less, of a one third length of the runway has other contaminants on it — a RWYCC of 5 (WET) for the one third length; and

(d) if the depth of any other contaminants on the runway is reasonably ascertainable — a report of the depth of the contaminants.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)

☐ Undecided / Not my area of expertise

Comment

This is the same format as per previous sections.

Key change

Add a requirement that the aerodrome operator must make a runway condition report (RCR) for the other contaminated runways to air traffic control (ATC), NOTAM Office and, if ATC is not available, to pilots, if possible.

Question 26 – Do you agree with the proposed reporting of contaminated runways to ATC, NOTAM Office or pilots?

Fact bank: Part 139 MOS; Subsection 12.05(14)

Content:

(14) The RCR must be made to:

(a) the NOTAM Office, and ATC (if available); and

(b) if the ATC is not available — but only where the aerodrome operator has available UNICOM, or CA/GRS, or another direct means of communication.

Radio buttons

☒ Agree

☐ Agree, with changes (please specify suggested changes below)

☐ Disagree (please set out your reasoning and alternative suggestions below)

☐ Undecided / Not my area of expertise

Comment

Again, the objective of GRF is to provide the most accurate information in the timeliest manner.

Page 13. Aerodrome reporting officer training – runway surface condition inspections and reporting

Key change

Add additional requirements that the aerodrome operator must ensure that aerodrome reporting officers are suitably trained to carry out aerodrome serviceability inspections and reports for runway surface conditions.

Question 27 – Do you agree with the proposed additional requirements for aerodrome reporting officers to be trained to conduct runway surface condition inspections and reporting?

Fact bank: Part 139 MOS; Subsections 13.03(c) and 13.03(d)

Content:

Paragraph 13.03 (c)

omit

inspection

insert

inspection, including in relation to runway surface conditions,

Paragraph 13.03 (d)

omit

aerodrome

insert

aerodrome, including in relation to runway surface conditions,

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This is self-evident that the AROs assessing the runway condition should be trained to perform this task.

Page 14. Competency of aerodrome personnel using continuous friction measuring devices

Key change

Add a requirement that the aerodrome operator must ensure that any person using a continuous friction measuring device is competent to use that device. Competence can be demonstrated through specific training or experience.

Question 28 – Do you agree with the proposed requirement for aerodrome personnel to be competent (trained or experienced) to use continuous friction measuring devices?

Fact bank: Part 139 MOS; Subsection 18.02(2A)

Content:

After subsection 18.02 (2)

insert

(2A) The aerodrome operator must ensure that any person using a friction measuring device mentioned in subsection (2) is demonstrably competent in the use of the device.

Note Competence may be demonstrated through appropriate training or experience.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This competency requirement was changed so that it could be achieved by appropriate experience and not exclusively by training.

Page 15. Maintenance requirements for water pooling or ponding on runways

Key change

Add a requirement that the aerodrome operator must undertake remedial maintenance action to repair a runway, after pooling, ponding, or poor drainage of water is detected, during a runway serviceability inspection following a severe wind event, a severe storm, or a period of heavy or prolonged rainfall.

It is not expected that runways or parts of runway surfaces need to be overlaid, re-surfaced or replaced, but maintenance action should be taken to address the formation of depressions or surface irregularities that allow water to pool, pond, or not drain.

Question 29 – Do you agree with the proposed requirement for the aerodrome operator to ensure that remedial maintenance is undertaken as soon as possible if there is pooling, ponding or poor drainage of water on a runway, on the condition that it doesn't require runways, or parts of runways, to be overlaid, re-surfaced or replaced?

Fact bank: Part 139 MOS; Section 18.03

Content:

insert

18.03 Water pooling or ponding

If pooling or ponding of water, or poor drainage is observed on a runway in the course of an aerodrome serviceability inspection under paragraph 12.01 (1) (a), the aerodrome operator must ensure that remedial maintenance is undertaken as soon as possible.

Note 1 Under paragraph 12.01 (1) (a), the operator of a certified aerodrome must carry out an aerodrome serviceability inspection if there has been a severe wind event, a severe storm, or a period of heavy rainfall.

Note 2 For section 18.03, it is not generally the case that runways or parts of runway surfaces need to be overlaid, re-surfaced or replaced, but maintenance action should be taken to address the formation of depressions or surface irregularities that allow water to pool, pond, or not drain

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This links the remedial maintenance requirements in Chapter 18 to observations of water pooling or ponding during a serviceability inspection (Chapter 12). It specifically precludes the need for a runway overlay, re-surfacing or replacement, whilst still requiring appropriate maintenance action to address the formation of depressions or surface irregularities that allow water to pond.

Page 16. Runway starter extension definition

Key change

Add a definition for 'runway starter extension' to reflect that it is an additional length of pavement available for take-off but not for landing.

Question 30 – Do you agree with the proposed definition of runway starter extension to distinguish it from a runway suitable for both take-offs and landings?

Fact bank: Part 139 MOS; Subsection 3.01(2)

Content:

Subsection 3.01 (2), definitions

insert

runway starter extension means an additional length of pavement that:

(a) is immediately before the runway threshold; and

(b) increases the distance available for take-off; but

(c) must not be used for landing.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

Runway starter strips are already in use (e.g. Sunshine Coast) but do not have an official CASA definition in the CASA Dictionary.

Page 17. Pre-threshold area markings

Key change

Amend the requirement for the pre-threshold area chevron marking to be a 'maximum' of 7.5 m from the runway edge instead of a 'minimum'. The wording is currently opposite to the Annex 14 Volume I requirement which allows the chevron marking to abut the runway edge for 30 m wide runways.

Question 31 – Do you agree with the proposed amendment that the chevron must be a ‘maximum’ of 7.5 m from the side of the runway edge instead of a ‘minimum’?

Fact bank: Part 139 MOS; Subsection 8.16(2)(e)

Content:

Paragraph 8.16(2)(e)

omit

less

insert

more

For proposed change when actioned and complete see below

(e) except where affected by the proximity of the non-displaced threshold or the runway end in the reciprocal direction — have line ends sufficiently long to end not more *than 7.5 m from the respective runway edges; and*

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This aligns with ICAO Annex 14 wording.

Page 18. CASA approval of temporary VASIS from requirement for flight check

Key change

Replace the requirement for CASA to exempt a temporary visual approach slope indicator system (VASIS) from the requirement for a flight check with the requirement for a CASA approval. This would still be subject to a safety assessment. The exemption process is unnecessarily burdensome for the requirements of the existing safety assessment.

Question 32 – Do you agree with the proposed amendment to provide for CASA to approve a temporary VASIS, without requiring a flight check or exemption?

Fact bank: Part 139 MOS; Subsections 9.18(1)(c) and 9.18(2)

Content:

Paragraph 9.18(1)(c)

repeal and substitute

(c) unless CASA approves otherwise, the VASIS;

Subsection 9.18(2)

repeal and substitute

(2) For paragraph 9.18(1)(c), CASA may only approve otherwise if:

(a) the VASIS is provided for temporary use only; and

(b) the approval is supported by a safety assessment; and

(c) the approval is in writing with appropriate conditions (if any).

Radio buttons

- ☐ Agree
- ☒ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

The change from exemption to an approval following a safety assessment is supported. Interestingly, there appears to be no definition for “temporary” in the MOS or CASA Dictionary. Whilst understanding the intent, it is important that temporary does not become a “de facto” permanent installation. If it is to be a permanent installation, it will require the requisite requirements, including a flight check.

Page 19. Requirement for read back of ATC clearances and instructions by aerodrome personnel

Key changes

Add a requirement that procedures need to be included in the aerodrome manual for airside drivers to read back to air traffic control (ATC) safety-related parts of any ATC clearances or instructions. Aerodrome manuals already contain procedures for aerodrome personnel to interact with ATC clearances and instructions.

Add a requirement that two-way VHF radios are required at controlled aerodromes to communicate with ATC, when ATC is in operation. The current equipment requirement is only for receivers and not transmitters thereby not requiring a capability to transmit a read back to ATC. Airside vehicles have always had to be in two-way communications with ATC when operating on the manoeuvring area. Therefore, this is formalising the requirement.

Add a requirement that airside drivers, when operating on the manoeuvring area, must comply with ATC clearances and instructions, read back safety-related parts of any ATC clearance or instruction and must always read back:

a. any route specified in a clearance or instruction
b. any clearances or instructions to, operate on, enter, stop on, wait on, hold short of, cross, or vacate, any runway or taxiway
c. any radio frequency instructions.

This provides for the specific circumstances when aerodrome personnel are required to provide read backs to ATC.

Question 33 – Do you agree with the proposed provisions for aerodrome personnel to read back ATC clearances and instructions at controlled aerodromes?

Fact bank: Part 139 MOS; Subsections 11.14(c), 14.03(4), 14.03(8) and Section 14.06

Content:

Paragraph 11.07(1)(c)

repeal and substitute

(f) carrying out works when the aerodrome is closed to aircraft operations;

(g) the use of surface vehicles and equipment, including in accordance with sections 11.14, 14.03 and 14,06, as applicable.

Section 11.14

repeal and substitute

11.14 Airside vehicle control

If surface vehicles operate on or near the movement area of an aerodrome, the aerodrome manual must contain the procedures for such operations, including procedures:

(a) for traffic movement (including speed limits) and enforcing traffic rules; and

(b) for establishing a method of instructing and testing drivers in relation to the traffic rules; and

(c) requiring the driver of the surface vehicle to read back to ATC the safety-related parts of any ATC clearances or instructions transmitted to the driver by voice.

Note See also section 14.06.

Subsection 14.03 (4)

repeal and substitute

(4) Subject to subsections (7) and (8), an airside vehicle operating on a runway strip, a runway, a taxiway strip or a taxiway must be equipped for communications as follows:

(a) for a non-controlled aerodrome or an aerodrome where ATC is not in operation — at least a VHF receiver capable of monitoring the CTAF or ATC frequencies, as applicable.

(b) for a controlled aerodrome where ATC is in operation — a VHF radio capable of two-way communications with ATC.

Subsection 14.03 (8)

repeal and substitute

(8) Subsection (4) does not apply to an airside vehicle or equipment if the vehicle or equipment is under escort by another vehicle that is equipped in accordance with subsection (4).

After subsection 14.05

insert

14.06 Surface vehicle control and communications

(1) The driver of a vehicle operating, or intending to operate, on the manoeuvring area of a controlled aerodrome must:

(a) comply with any clearances and instructions issued by an air traffic controller; and

(b) read back to an air traffic controller the safety-related parts of any clearance or instruction which the controller has transmitted by voice.

(2) Without affecting subsection (1), the following parts of a clearance or instruction must always be read back to the air traffic controller:

(a) any route specified in a clearance or instruction;

(b) any clearance to, any conditional clearance to, or any instruction to, operate on, enter, stop on, wait on, hold short of, cross, or vacate, any runway or taxiway;

(c) any radio frequency instructions.

Radio buttons

- ☒ Agree
- ☐ Agree, with changes (please specify suggested changes below)
- ☐ Disagree (please set out your reasoning and alternative suggestions below)
- ☐ Undecided / Not my area of expertise

Comment

This should help to prevent potential runway incursions involving ground vehicles.

Page 20. Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0 - Global reporting format – Runway surface condition

The purpose of this Advisory Circular (AC) is to provide guidance on implementation of the proposed Global Reporting Format (GRF). The GRF provides an internationally harmonised and standardised method of assessing and reporting runway surface conditions which impact flight operations.

Assessing and reporting the surface condition of the runway is necessary to provide pilots and flight crew with the information needed for take-off and landing performance. Pilots need to know the condition of the runway surface in order to assess the impact on braking action when runways have reduced surface friction.

This AC includes:

- implementation of GRF in Australia
- operational requirements of aircraft operators and pilots
- inspection, assessment and reporting requirements of aerodrome operators
- notification requirements of ATC and the NOTAM Office
- runway surface condition assessment and reporting
- assessment methods for monitoring runway surface friction characteristics
- training syllabus for aerodrome operators
- training syllabus for aircraft operators and pilots.

This AC will be of interest to:

- Air transport operators
- Air transport pilots
- Other pilots
- Aeroplane owners/operators
- Aerodrome operators
- Avionics manufacturers
- Air traffic service providers
- Aeronautical information service providers.

Documents for review

All documents related to this Advisory Circular are attached in the ‘Related’ section at the bottom of the overview page and available here for your convenience:

- SPC on CD 2313AS
- Consultation Draft - Part 91 Manual of Standards (Global Reporting Format) Amendment Instrument 2023 (No. 2)
- Consultation Draft - Part 139 Manual of Standards (Global Reporting Format and Miscellaneous Amendments) Instrument 2023

Fact bank - Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0

Please provide any comments you may have on Draft Multi-Part AC 91-32 and AC 139-22 - Version 1.0 in the comments box below.

Comments

AusALPA’s suggestion to include more pictures and diagrams to break up the text and to illustrate the rationale for GRF has been incorporated. The AC is now clearer and more understandable.

2.1.2.8 Not limited to FMS. Generic tables are available for aeroplanes without manufaturers' data (see below). Maybe also include a reference to the table in 2.2.5

Performance data

Generic landing distance factors (LFD) (ICAO Doc 10064/TALPA ARC)

Runway condition code (RWYCC)	6	5	4	3	2	1
Turbojet without reverse	1.67	2.6	2.8	3.2	4.0	5.1
Turbojet with all reversers operating	1.67	2.2	2.3	2.5	2.9	3.4
Turboprop (see Note 2)	1.67	2.0	2.2	2.4	2.7	2.9

The Note on Page 30 associated with Fig 14 is confusing. Would it be better to show different percentage coverage i.e. 25%, 50%, 25%, 25% and state that the highest percentage should be reported?

It would be useful to provide an example of Downgrading a RWYCC.

Page 21. General comments

Do you have any additional comments about the proposed policies? Please note, this should not include points you have already raised.

Please include in these comments any **impact** this change may have on you or your operation.

Comments

The Australian Airline Pilots Association supports the proposed policies with only minor comments. We believe that extending the GRF to all certified aerodromes with sealed runways is warranted and aligns Australia closer to ICAO and provides a clear safety benefit for our members. We also believe that aim of the proposed regulations "to simplify the reporting format to ensure that the burden of assessment for aerodrome operators is reduced as much as possible, while still providing aircraft operators and pilots with the necessary operational information" has been achieved. We thank Roy Tuomela for his efforts.

AusALPA has been both an advocate for GRF and an active member of the GRFWG and most of its suggestions have been included in the proposed policies and the draft AC. AusALPA also supports proposals from other stakeholders which have been incorporated into these proposals as they follow a reasoned debate within the WG. AusALPA's concern is that these proposals could be undone following public consultation because of vested interest and/or uninformed opinion.

Finally, AusALPA has noted that the intent of standards and regulations can be changed during the legal drafting process. It is hoped that, as the draft text has been included, this will not happen in this case.