

AVIATION GROUPS SPEAK OUT AGAINST FAA DECISION TO WITHHOLD WEATHER INFORMATION FROM PILOTS

The Alaska Airmen Association and 13 other aviation and state organizations issued a joint statement in response to the FAA's decision against including numerous surface weather observations sites in the system that provides textual information to pilots through flight planning websites and various aviation apps. As a result of the FAA decision, the FAA Weather Message Switching Center Replacement (WMSCR) and the Aviation Digital Data Service (ADDS) will not share with pilots textual weather available from hundreds of observation systems already in place.

The groups said, "There are hundreds of weather observations systems in operation but unavailable to the pilots who need them. These systems could provide accurate and useful weather data, and the FAA and other countries have given pilots access to *similar* information so they can make better decisions and fly safer. We ask the FAA to reconsider denying pilots access to this valid and useful weather information."

On Aug. 22, 2017, the 14 groups co-signed a letter asking the FAA to 1) remove the technical requirement that non-federal weather stations must be AWOS-III or better to be included in WMSCR, and 2) allow the establishment of a new VFR weather station standard to allow fewer maintenance visits and reduce operational costs. In response, the FAA sent a Feb. 15, letter denying the request.

The organizations agree that they will continue to work this issue in order to convince the FAA to change its decision.



August 22, 2017

Mr. Vaughn Turner

Vice President, Technical Operations Federal Aviation Administration

800 Independence Avenue SW Washington, DC 20591

RE: Surface Weather Observation Policy Dear Mr. Turner,

We are writing today to express our frustration at the lack of inclusion of valid surface weather observation sites in the FAA's Weather Message Switching Center Replacement (WMSCR). The lack of surface observations is a widespread safety issue as general aviation aircraft, air ambulance services, and a significant number of commercial operators fly under Visual Flight Rules (VFR). These aviators need to know that they can maintain the requisite cloud clearance and visibility to complete their mission. Unfortunately, there are hundreds of weather observation systems currently operational in the United States that can provide adequate aviation weather reports that are not visible to pilots.

Attempts to fly by visual references in instrument conditions, also known as unintentional VFR into Instrument Meteorological Conditions (IMC), is a leading cause of fatal general aviation accidents and the leading cause of weather-related accidents. Although increased weather

reporting could prevent accidents and save lives, the cost to acquire and maintain fully certified Automated Weather Observing System (AWOS) stations makes it unlikely that this will occur under the current federal and state budget climate.

According to an independent review of National Transportation Safety Board (NTSB) accident reports conducted by Dr. Ira Blumen as part of the Opportunities for Safety Improvement in Helicopter Emergency Medical Services (HEMS) Project, between 1983 and 2013, 25% of the accidents directly related to weather. The fatality rate in these cases, according to Dr. Blumen's study, was 58% versus the non-weather related accidents where it was just 33%. Further, the National EMS Pilot's Association asserts that weather reporting has a significant impact on the decision of these operators to either launch or to decline a request for patient transport. The HEMS Weather Tool was implemented to help provide a more complete weather picture to these pilots so they could make more informed decisions. The HEMS Weather Tool is limited to VFR operations and only for the operator to make "no-go" decisions.

There would be a tremendous benefit to have additional weather information included in the HEMS Weather Tool, particularly the non-federal weather systems not included in WMSCR, due to the aviation reporting information they provide. Incorporating more weather systems that could be limited to assisting pilots "no-go" decisions could prevent VFR-into-IMC and save lives. We believe these weather systems must have operational integrity and sensible quality assurance for them to be effective for pilots.

The good news is that there are lower level AWOS systems and non-AWOS weather stations already in operation that the FAA has noted meet aviation standards. The National Weather Service in Alaska is installing stations that collect the basic parameters required by the aviation community (ceiling, visibility, wind, temperature, altimeter, etc.) using a system that is not certified by the FAA called the Modular Automated Weather Station (MAWS). These weather stations, and many others, have dissemination restrictions for pilots because of FAA technical

barriers that designate certification and maintenance standards. We believe this FAA criteria is excessive for weather stations that could be limited to use for VFR flight.

The FAA's weather policy stipulates that for any non-Federal weather station to be connected to WMSCR that the facility meet and be maintained at the same standard as FAA facilities. This means that weather observations officially provided to users must be AWOS-III systems or better. These systems must also be initially FAA certified, undergo annual FAA recertification, and receive a minimum of three maintenance visits a year. These additional requirements take place after the initial expense of installing an AWOS station, and can be prohibitively expensive for operators, particularly in isolated environments where they are most needed.

A supplementary weather certification and maintenance standard would allow the hundreds of non-federal and federal weather systems across the country that are comparable to AWOS-III to be usable to pilots for advisory information. While the FAA has agreed that the National Weather Service's MAWS systems meet the basic requirements of an AWOS-III, they are unwilling to waive the requirements for three maintenance visits a year, a significant expense in areas like Alaska. An alternate weather certification standard would allow many more reporting locations, like the MAWS, to be visible to pilots for VFR advisory purposes.

The current policy is too restrictive and serves as a barrier to VFR operators having greater access to weather. The fact that hundreds of weather observation systems are already available that meet aviation standards, but not technically able to be included in WMSCR, means pilots are being deprived of critical information that could enhance the safety of flight. There are precedents for a VFR-only system. For example, the FAA maintains several NDBs that are designated as for VFR-only navigation. We believe the existing FAA standards could be relaxed to reflect the nature of VFR operations.

To provide greater weather information to operators, some other countries have implemented alternative weather dissemination standards. One country uses the Limited Weather Information System (LWIS) moniker for these more basic automated weather systems. These automated stations generate wind, temperature, dew point, and altimeter setting using LWIS as the identifier, instead of METAR or

SPECI. The weather report is issued in the same order and with the same content, coding and formatting as for a METAR, except several elements may be omitted. The LWIS is similar to the AWOS-AV, AWOS-I, and AWOS-II systems; however, these systems in the United States are not disseminated via WMSCR. These other countries file a difference to ICAO's Annex 3 that allows them to meet the needs of their customers and comply with their international obligations.

In conclusion, we are asking for the FAA to remove the technical requirement that non-federal weather stations must be AWOS-III or better to be included in WMSCR, and to allow the establishment of a new VFR weather station standard that would allow fewer maintenance visits and reduced operational cost for owners. The VFR weather stations could have a unique identifier, similar to LWIS, to ensure pilots understand that that system may be used for limited purposes. The incorporation of these hundreds of weather systems will provide much better information to pilots as they conduct their VFR flight planning. By reducing the cost of both the initial investment and ongoing maintenance, we expect that additional stations will be established, leading to improved aviation safety.

Sincerely,

Air Medical Operators Association

Aircraft Owners and Pilots Association

Alaska Airmen Association

Association of Air Medical Services Association of Critical Care Transport

Colorado Division of Aeronautics

Experimental Aircraft Association

General Aviation Manufacturers Association Helicopter Association International

National Association of State Aviation Officials National EMS Pilots Association

United States Helicopter Safety Team Infrastructure Work Group Utah Business Aviation Association

Utah Division of Aeronautics



U.S. Department
of Transportation
**Federal Aviation
Administration**

Technical Operations Services
800 Independence Ave., SW.
Washington, DC 20591

FEB 15 2018

Mr. Adam White
Alaska Airmen Association
4200 Floatplane Drive
Anchorage, Alaska 99502

Dear Mr. White:

This is in response to your August 22 letter regarding Surface Weather Observation Policy, co-signed by the other associations. In the letter you are requesting two changes to Federal Aviation Administration (FAA) policy regarding Automated Weather Observing System (AWOS). The request is for the FAA to remove the technical requirement that non-federal weather stations must be AWOS-III or better to be included in Weather Message Switching Center Replacement (WMSCR), and to allow the establishment of a new Visual Flight Rules (VFR) weather station standard that would allow fewer maintenance visits and reduced operational cost for owners. The FAA's response to the requested changes is provided below:

- 1. Remove the technical requirement that non-federal weather stations must be AWOS-III or better to be included in WMSCR.**

Currently Technical Operations has no plans to remove this requirement or change policy and/or processes. There are national and international policy issues that will have to be addressed as well as establishing a means by which a site's AWOS certification level can be reliably determined and communicated to WMSCR and others.

National and international policy issues.

- WMSCR transmits Aviation Routine Weather Report (METAR) information both nationally and internationally. The content of the METAR message is defined nationally in Federal Meteorological Handbook No. 1, chapter 12 and internationally in International Civil Aviation Organization (ICAO) Annex 3, section 4.5. These definitions are consistent with each other and with the AWOS-III sensor suite. Because only certified weather information is allowed to be broadcast in the METARs and because there is no way to differentiate between certified and advisory weather information in the METAR message, the minimum system configuration was determined to be AWOS-III.

- AWOS Advisory Circular 150/5220-16 maps to ICAO. Systems meeting this criterion are classified as AWOS-III or better.
- FAA Order 8900.1 (Volume 3, Chapter 26, Section 2, 3-2073- A 1 b) stipulates that only AWOS-III sites are approved sources of weather.

Determining a means by which a site's AWOS certification level can be reliably determined and communicated to WMSCR and others.

WMSCR uses the National Flight Data Center's (NFDC) Weather Reporting Locations (WXL) data as the authoritative source of valid surface weather observation sites. NFDC has processes and procedures for vetting a surface observation site for inclusion in their WXL data. WMSCR has no independent means of determining the validity of a surface observation site. As a result, when WMSCR receives a request to add a surface observation site to the WMSCR database, a check is first made to verify that the site is included in the NFDC WXL data. If the site is not included, the request is rejected.

The FAA NFDC is the central authority and official repository collection, validation and quality control of aeronautical information disseminated to support the National Airspace System (NAS) operations detailing the physical description, geographical position, and operational characteristics and status of all components of the NAS.

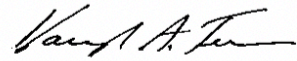
In reference to providing additional data sources, currently, the agency does not have the necessary infrastructure or ability to support the development of the necessary criteria and vetting to ingest this data and disseminate it via WMSCR. The FAA plans on further refining the policies, procedures and infrastructure in the future as part of a future acquisitions under NextGen Weather Systems.

2. Allow the establishment of a new VFR weather station standard that would allow fewer maintenance visits and reduced operational cost for owners.

Twice yearly visits plus the annual visits are performed at all FAA federal and non-federal AWOS sites. This requirement was established to ensure that the system performs at an optimal level. The FAA strives to provide safe information to the public.

Pursuant to our previous conversation, I trust that you will see to it that the other co-signors of this letter receive my response.

I appreciate your thoughtful suggestions and believe we have responded in kind. However, if you have any additional concerns, please do not hesitate to contact me.

A handwritten signature in black ink, appearing to read "Vaughn A. Turner". The signature is fluid and cursive, with the first name "Vaughn" being more prominent.

Vaughn A. Turner
Vice President, Technical Operations Services