

Atlas Air Inc.
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October 17, 2019

Mr. David Gray
Manager, Surveillance and Broadcast Services, AJM-42
Air Traffic Organization
Federal Aviation Administration
600 Independence Ave. SW,
Wilbur Wright Building,
Washington, DC 20597

Re: Request for Comment; Clearance of a New Approval Information Collection: Service Availability Prediction Tool; Docket FAA 2019-0631

Dear Mr. Gray:

Atlas Air Inc. ("Atlas Air") and its affiliates, Polar Air Cargo and Southern Air, submit this comment in response to the notice requesting comments regarding the FAA's preflight ADS-B SAPT web-based tool for predicting availability of the GPS satellite constellation to ensure a defined level of position source integrity for surveillance purposes. 84 *Fed. Reg.* 43,862 (Aug. 22, 2019). The August 22 notice is directly related to the earlier, "Statement of Policy on Performance Requirements for Operators That are Equipped With Automatic Dependent Surveillance-Broadcast Out" 84 *Fed. Reg.* 31,713 (Jul. 3, 2019) ("Policy Statement"). As described in this comment, we believe that the FAA's Policy Statement together with the deployment of the web-based tool may have unintended consequences.

Description of the issue

Subject to various market and other conditions, Atlas Air and its affiliates intend to operate a fleet that is fully equipped with SBAS/WAAS capable avionics by December 31, 2024. Between January 1, 2020 and December 31, 2024, Atlas Air and affiliates intend to operate a mixed fleet equipped with either SA-On, SA-Aware, or SBS/WAAS capability in a manner consistent with FAA exemption No. 12555. Atlas Air and its affiliates plan to use a third-party prediction tool for SA-On equipped aircraft. We would use the FAA's Service Availability Prediction Tool (SAPT) if the initial prediction indicates that performance will fall below rule requirements for such aircraft.

The Policy Statement indicates that operators may have to conduct subsequent predictions using the FAA SAPT because of either: (1) a change in departure time; or (2) change in satellite constellation. *Id.* at 31,715. The latter circumstance concerns us for several reasons.

If operators must reinitiate flight planning and related processes prior to receiving an ATC clearance but after performing the required predictions because of a change to the satellite constellation, it may seriously disrupt certain flight operations. For instance, flights with routings that include the North Atlantic Track System may miss their slot to make oceanic crossings resulting in considerable delay and business disruption. In addition to preparing and filing a revised flight plan, operators must factor in time required for fuel planning and reprogramming of flight management computers that would be necessitated by a last-minute prediction.

To the extent that it affects Atlas Air and its affiliates, the Policy Statement also poses practical challenges which should be considered. In particular, Atlas Air and its affiliates are unaware of any means to timely and efficiently identify relevant changes in the satellite constellation for any given flight. The current NOTAM system is not configured to timely alert operators to relevant changes in the satellite constellation. As written, the Policy Statement appears to imply that operators must continuously search for relevant NOTAM, which might not exist, rather than monitor NOTAM. Atlas Air and its affiliates very respectfully note the Policy Statement may not have fully contemplated impacts on the flight planning process.

Recommended solution

The Policy Statement also addresses the situation of SAPT outages. It states in relevant part:

The FAA does not intend to inhibit operators from conducting otherwise permissible operations when the SAPT is unavailable. As such, when there is a SAPT outage, the policy described above will apply to operators who rely on the SAPT if their operations falls below the performance requirements. *Id.* at 31,716.

This statement above recognizes that flight operations may be conducted safely even when SAPT is temporarily unavailable.

Atlas Air and its affiliates propose that the FAA treat a change to the satellite constellation in the same manner as a SAPT outage, from the time a flight plan is filed with ATC until departure. In other words, a change to the satellite constellation should not trigger an updated SAPT prediction after the flight plan has been filed with ATC. The inherent logic of the Policy Statement relating to SAPT outages lends credence to this approach.

Such an approach would yield a level of safety equivalent to one articulated in the Policy Statement and would eliminate needless disruptions caused by reinitiating an entire series of pre-flight activities.

We believe this matter is directly relevant to the use of the web-based tool described in the August 22 notice.

Sincerely,



Richard Rolland
Vice President Safety and Regulatory Compliance