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**Re: Transition of Six Area Forecasts Covering CONUS to Digital and Graphical Alternative Products, and Retirement of the Legacy Area Forecast Product Safety Risk Management Panel**

Dear Mr. Johnston,

The Aircraft Owners and Pilots Association (AOPA), the world's largest aviation membership association, submit the following comment to the November 9th Safety Risk Management Panel (SRMP) evaluating the retirement of six legacy text-based Area Forecasts (FA). As AOPA is unable to attend, we request the hazards identified below be discussed by the panel, mitigated, and assigned a hazard level as they relate to the National Airspace System (NAS).

**Graphical Product Benefit**

AOPA has supported the Aviation Weather Requirements Working Group recommendation that the text-based FA be retired. The FAA has noted the legacy FA's limitations including that they "are generally too broad to adequately inform a pilot of known icing conditions," (see January 16, 2009, FAA legal interpretation to Leisha Bell) and cannot be used for determining weather conditions at specific airports (see December 11, 2014, FAA legal interpretation to Michael Wuerger). Many weather products are now available that offer the same information and with greater granularity, detail, and in a graphical presentation.

General aviation pilots have embraced the capabilities that come with modern technology and the increased benefit of graphical weather. In a 2016 AOPA survey, 60.7% of pilots indicated that when obtaining a standard pilot weather briefing they frequently or always use a third-party website and an additional 28.6% use one of the two free Flight Service web portals. These services offer graphical weather as a primary resource and many allow forecasts to be overlaid along the route of flight.

Pilots receiving weather in the cockpit have also benefited from the increasing number of graphical products. Over 82% of general aviation pilots indicated they routinely use an Electronic Flight Bag (EFB) in the cockpit. Many EFBs are capable of receiving weather in the cockpit which has become widely available thanks to FIS-B. Most of the weather data uplinked to these aircraft is used to generate graphical depictions, which is not possible with the legacy FA product.

The 2016 implementation of the Graphical Area Forecast (GFA) provides a single resource for pilots that effectively consolidates multiple weather products and facilitates enhanced preflight planning. The GFA and other existing weather products offer functionality and customization that allow greater situational awareness for pilots than the legacy FA product provides. These modern weather products have become an effective FA replacement.

**Updating Guidance and Publicizing the Change**

Pilots have relied on FA's for decades as a primary resource for determining what weather is forecast along their route of flight. Removing this product without advanced warning could result in pilots not having information critical to flight. The FAA must ensure pilots are adequately alerted to the removal of the CONUS FAs and what products are available where they can receive the same information. The FAA must be clear that the GFA and other available weather products replace the FA for operational use and together can assist an operator meet the requirements of 14 C.F.R. §135.611, *IFR operations at locations without weather reporting*.

AOPA recommends the FAA create a one-page briefing document explaining the FAs removal, what replacement resources are available, and how pilots would benefit from using these other products. The removal of the six FAs and the briefing document's availability should be publicized in the FAA Safety Magazine, in a FAAST Blast, and on the AWC website. AOPA would also be supportive of advertising the change and the briefing document via our online and print resources.

The FAA should initiate work to update pilot information products, including the Pilot's Handbook of Aeronautical Knowledge and the Aeronautical Information Manual, to reference what the replacement weather products are and how they can be accessed. The definition of AIRMET and Weather Advisory will also need to be amended to remove the reference to Area Forecast as it pertains to CONUS. Several airmen knowledge tests may need to be amended to remove questions related to Area Forecasts and the examples provided in the supplements.

**Flight Service**

Flight Service specialists must have the ability to brief pilots on the information that otherwise would be available in the FA. The same customization and functionality that pilots like about the GFA is a challenge for Flight Service specialists. Specialists need to be able to quickly see, interpret, and relay the weather impacting a pilot's flight. The FAA should ensure that these specialists continue to have the same information that they do now as otherwise the removal of CONUS FAs could be a barrier to pilot's getting all the information they need from Flight Service for a safe flight.

**Conclusion**

AOPA supports the transition to modern graphical weather products; however, we believe the FAA must update pilot guidance and knowledge tests, publicize the changes, and ensure Flight Service specialists continue to have the ability to effectively and efficiently brief pilots in order for FAs to be safely retired. Thank you for reviewing our comment on this important issue. Please feel free to contact me at 202-509-9515 if you have any questions.

Sincerely,

Rune Duke
Director, Airspace and Air Traffic

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of General Aviation Pilots and Aircraft Owners. AOPA's mission is to effectively serve the interests of its members and establish, maintain and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.