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If you have a suggested addition for the Change Driver listing, please complete this form and email to: afs630comments@faa.gov.

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Change Driver Title: Instrument Rating - Airplane, Airmen Certification Standards (FAA-S-ACS-8), Appendix 5: Instrument Proficiency Check
(e.g., AC #, NTSB Safety Recommendation #, CFR 14 Part #, Handbook topic, technology update, etc.)

Is this **Change Driver**

Operations related? X
 Airworthiness related?
 both Operations and Airworthiness related?

Guidance –

Does this Change Driver affect FAA Guidance? Yes X No

If so, what guidance? Instrument Proficiency Check (IPC) guidance (handbooks and ACs – i.e. Instrument Flying Handbook, AC 61-98, Currency Requirements and Guidance for the Flight Review and Instrument Proficiency Check, etc.)

How is the guidance affected? Note, where applicable, that a circle-to-land and landing are no longer required tasks to successfully complete an IPC.

Standards –

Does this Change Driver affect FAA Standards? Yes X No

If so, what standards? Instrument Rating – Airplane ACS FAA-S-ACS-8B

How are the standards affected? Removal of circle-to-land (VI.D) and landing from an instrument approach (VI.E) requirement from Appendix A; this would allow the IPC to be completed solely with an ATD

Knowledge Testing –

Does this Change Driver affect Knowledge Testing? Yes X No

If so, what knowledge test(s) is affected? Instrument Rating Knowledge Exam

How is the knowledge test(s) affected? Possible test questions

Change Management / Public Data –

Does this information need to be posted on '[What's New and Upcoming in Airman Testing](#)'? Yes X No


Suggested Course of Action –

What, if any, other course(s) of action do you suggest?

AOPA proposes the FAA remove from the IPC the circle-to-land (VI.D) and landing from an instrument approach (VI.E) tasks stipulated in the Instrument Rating – Airplane ACS. The removal of these two elements would allow the IPC to be completed entirely from an ATD – saving pilots considerable time and money while maintaining, and possibly, improving

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Check the Master List to Verify That This is the Correct Revision Before Use

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both the safety and proficiency of the pilot. We believe this request is in line with the FAA's strategy to transition away from circling procedures and their goal of encouraging the use of ATDs.

Circle-to-land


The FAA and industry have been collaborating in venues like the Performance Based Operations Aviation Rulemaking Committee (PARC), General Aviation Joint Steering Committee (GAJSC), and Commercial Aviation Safety Team (CAST) to promote initiatives that encourage stabilized approaches. This work has led to expanding Terminal Instrument Procedures (TERPS) design criteria to facilitate straight-in approaches and vertical guidance to more runway ends. To further promote stabilized approaches and to transition away from circling procedures, the FAA and industry included in the 2016 PBN NAS Navigation Strategy this note: "circling approaches would be phased out as training requirements are updated and user demand for circling approaches subsides." Additionally, the RTCA Tactical Operations Committee (TOC) noted in a March 2016 response to an FAA tasking on instrument procedure reduction that circling procedures remain relevant largely due to the continued testing of airmen on these procedures, which operationally are infrequently flown. Although circling procedures have value and will continue to exist in the NAS, their utilization is decreasing as new procedures facilitated by PBN and TERPS criteria make them irrelevant. As industry and the FAA have agreed that the goal is to transition away from circling procedures, it is important we remove unnecessary artificial barriers like the requirement to demonstrate circle-to-land as part of the IPC.

AOPA agrees with the FAA that ATDs have progressed significantly over the last decade. As the agency notes, "ATD development has advanced to an impressive level of capability." (81 Fed. Reg. 29720, 29723 (May 12, 2016)) The FAA has made significant progress in embracing and promoting ATDs. We believe the FAA should allow the use of ATDs in an equivalent manner as an aircraft or Full Flight Simulator for the purpose of meeting the existing IPC requirements in § 61.57(d). The IPC is driven by the standards for the instrument rating practical test; however, not all elements required by the instrument rating practical exam are required by an IPC. For example, loss of communications is not part of an IPC but it is part of the initial practical test for the instrument rating. The recent changes to § 61.57(d) further support that a pilot performing an IPC is not expected to demonstrate every element required for the instrument rating. This new regulation omits any reference to circle-to-land procedures. The operational relevancy of circling procedures is declining and we believe pilot knowledge of circling procedures need not be demonstrated in an actual aircraft to complete an IPC. AOPA contends the inclusion of the circle-to-land maneuver as part of the IPC is onerous and unnecessary, and it needlessly limits the benefits and utility of an ATD.

Landing from an instrument approach

Deleting the requirement to demonstrate a "landing from an instrument approach" is supported by the fact that the IPC does not need to be a repeat of the instrument rating practical test and that this task is not required by any regulation. Landings are a routine operation, included in the required biennial flight review, and not unique to instrument flight. Pilots undergoing an IPC do not need to demonstrate their ability to conduct air traffic control communications, as this is a basic skill, and it should not be required that pilots must demonstrate a landing, another basic skill. Additionally, § 61.57(a) and (b) require the pilot to maintain landing proficiency, making this task redundant. The purpose of the IPC is to ensure pilots are proficient in tasks required for instrument flight; it does not need to cover other tasks such as stalls or slow flight which, although important for pilots to be proficient on, are not prominent elements of instrument flight. Like stalls and slow flight, a requirement separate from an IPC and instrument flight ensures pilots are proficient on landings.

The relevant instrument flight skill that is part of a "landing from an instrument approach" is the pilot's transition from flight solely by instruments to visual flight. This task can still be accomplished by a pilot conducting an IPC via an ATD by their demonstration of a non-precision and precision approach, even if a landing does not actually take place. Pilots practice the skill of looking in-and-out of the cockpit, from instruments to out-the-window, when approaching landing minimums. This skill is practiced without the need to simulate touch down; it could include a scenario of seeing the runway lights and runway environment, or the need to fly the missed approach procedure because the required airport environment was not

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visually identified. Scenario-based training is encouraged by the FAA's *Instrument Proficiency Check Guidance*. This FAA guidance could be updated to include examples relevant to the task of instrument to visual transition should the "landing from an instrument approach" be removed from the IPC.

Pilots would likely receive a more realistic assessment of their transition from instruments to out-the-window using the ATD as it can simulate realistic visibility limitations and cloud obscuration, which can cause illusions. Using the ATD would allow a more challenging scenario that results in the first peek outside not resulting in the runway being in sight. Pilots flying an IPC in an aircraft on an average day will likely encounter VFR conditions, and practicing the skill of transitioning from instruments to out-the-window is not realistic when peeking outside allows one to see the runway well before minimums.

Additional Notes: _____

Attachments (if any): _____
