



AIR LINE PILOTS ASSOCIATION, INTERNATIONAL

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February 14, 2023

The Honorable Maria Cantwell
Chair
Senate Committee on Commerce,
Science, and Transportation
254 Russell Senate Building
Washington, D.C. 20510

The Honorable Ted Cruz
Ranking Member
Senate Committee on Commerce,
Science, and Transportation
512 Dirksen Senate Building
Washington, D.C. 20510

Dear Chair Cantwell and Ranking Member Cruz:

As the president of the Air Line Pilots Association, International (ALPA), I write to you on behalf of more than 67,000 airline pilots who fly for 39 airlines in the United States and Canada. We thank you for holding the hearing “The Federal Aviation Administration’s (FAA) NOTAM System Failure and its Impacts on a Resilient National Airspace” on February 15, 2023, to discuss this very important topic.

Every day that ALPA pilots report for work, we rely on the Notice to Air Missions (NOTAM) system and the information it disseminates to provide the highest level of safety in the operation. Every pilot flying the line needs a reliable, usable NOTAM system that complies with international standards to safely operate their aircraft to transport passengers and cargo to their destination. Much work is needed to improve the NOTAM system and the information that it disseminates, and the Senate Committee on Commerce, Science, and Transportation’s work to review the causes and impacts of the NOTAM system outage and the FAA’s actions to strengthen the resiliency and reliability of the system is a necessary first step.

The committee will also examine other issues, including the challenges of modernizing the national air traffic system and maintaining legacy technology. This is a critical discussion. Congress has the opportunity, and the responsibility, to provide the FAA with the resources it needs to fully modernize the NOTAM system and other foundational elements that keep our air traffic control system safe and reliable. This should be an important consideration in the FAA reauthorization.

In the past, Congress has provided the FAA with a single year’s worth of funding for multiyear modernization projects, such as NOTAM system upgrades. This “band aid” approach creates enormous challenges for the FAA to keep massively complicated projects on course and bring

them to completion. Continuing resolutions, government shutdowns, authorization extensions, and other disruptions also hinder the infrastructure modernization process. With all of these issues at play, modernization of a critical system becomes a series of stop, replan, and restart. This is not a reliable or efficient approach to effectively plan and execute the modernization plan for our nation's air traffic control infrastructure.

Giving the FAA the resources it needs to complete the mission, across multiple appropriation cycles, is a key area where Congress can assist in ensuring that our nation's air traffic control system will meet the needs of the Americans who depend on safe and reliable air transportation.

However, reliable infrastructure is only part of the issue. As noted by the National Transportation Safety Board in its investigation of the Air Canada 759 incident, the quality and sheer volume of NOTAMs in the system alone can become a safety hazard. In that instance, finding the most critical NOTAM to alert pilots to a runway closure at their destination airport—amidst the myriad of other NOTAMS for that flight—was unsuccessful. Even a fairly short flight from Washington, D.C., to Boston, for example, often contains 50 pages or more of NOTAMs, which pilots, controllers, and dispatchers are responsible for knowing for every flight. Modernizing the system must consider streamlining to ensure the presentation of the NOTAM effectively conveys the most critical information, rather than simply the volume of information.

The original intent for NOTAMs was to provide operators with information that was so new or urgent that the NOTAM was used as a temporary alert until the information could be published on charts or other aeronautical publications. However, that is no longer the case. It is routine for information on a NOTAM to remain indefinitely. For example, there are NOTAMs at nearly all 5,000 airports in the United States today for wildlife that simply state: "Bird activity in the vicinity of the airport." These will never expire. While such NOTAMs have become commonplace, perhaps due to liability reasons, this generic information contains no recommended action for pilots, controllers, or dispatchers to improve safety. Instead, the unexpired NOTAMs add complexity from a human factors perspective.

ALPA has identified other needed changes to the NOTAM system including:

- Improved guidance and training for personnel who upload NOTAMs on appropriate use and terminology.
- A simple "expiration date" that limits the length of time a NOTAM can stay in the system, requiring periodic review for purpose, validity, and revision.
- Increased use of graphical depiction of certain types of NOTAMs, including rocket ship launch airspace protection zones where the risk to airline operational safety may be reduced.
- Categorization of NOTAMs that can be prioritized and sorted or filtered depending on that particular flight or type of operation (i.e., small general aviation aircraft content versus high-altitude turbojet content).
- Potential depiction of NOTAM information overlaid on electronic moving maps and/or electronic flight bags.

For too long, NOTAMs have been inappropriately used in place of actual rules and regulations, for example:

- Issuing NOTAMs instead of processing necessary changes to aeronautical charts.
- Allowing unlit towers or other obstructions to be “NOTAM’d unlit” for years.
- NOTAMs issued to allow for the use of a navigation aid that is no longer functional, but still necessary for efficient flight operations.
- NOTAMs used to alert for a visual approach lighting system outage for more than 3 years during a construction project (instead of being charted, as is proper procedure).
- Many instances where NOTAMs are used excessively as an inappropriate workaround for addressing timely but long-term airspace status issues.

Finally, I want to highlight that the task force envisioned in S. 66, the NOTAM Improvement Act of 2023, would serve as an expert resource of representatives from pilot unions, air traffic control, general aviation, business aviation, airlines, dispatchers, and other users who can help with these operational issues and solutions.

ALPA appreciates you holding this important hearing and looks forward to working with you to reform the NOTAM system and to further authorize and appropriate the necessary funding for the FAA to modernize the system. We stand ready to support your work on these and other critical aviation issues to ensure that our national airspace system remains the gold standard for safety and efficiency.

Respectfully,

A handwritten signature in black ink, appearing to read 'JAM', written in a cursive style.

Captain Jason Ambrosi
President, Air Line Pilots Association, International