

Mr. Brian J. Gault
17399 Ida Center Road
Petersburg, MI 49270

February 16, 2012

Ms. Karen Gorman
Deputy Chief, Disclosure Unit
US Office of Special Counsel
1730 M Street, NW, Suite 300
Washington, DC 20036-4505

RE: Comments on DI-11 1675, 1677

Dear Karen,

Thank you so much for all your time and effort in this matter. Below, please find my comments on the above referenced cases. I apologize that it has taken me some time to finalize my thoughts, but I find that I have edited my comments the better part of a dozen times, due in part to a newly released memorandum rescinding the Terminal Safety interpretation referenced in the Inspector General's investigation and report. This new memorandum changed my analysis and comments substantially.

If you should require additional information, please don't hesitate to ask.

Thank you for all your time and efforts in this matter,

Sincerely,

A handwritten signature in black ink, appearing to read "Brian J. Gault", with a long horizontal flourish extending to the right.

Brian J. Gault

Although all three charges levied by both myself and Mr. Sugent were substantiated by the Inspector General (IG), after careful review of the IG investigation and associated report, the supporting materials provided, and Secretary LaHood's response and plan of action for the Agency, I find that there are three main issues/areas that warrant comment. They are as follows:

- While it's true that both Mr. Sugent and I arrived at the conclusion that DTW is presently running an illegal operation based on the separation standards contained within the 7110.65 (the Order), we arrived at our respective conclusions through very different analysis. While Mr. Sugent's complaint is mostly predicated on an Operational Error that he was assigned in December of 2009, my complaint is predicated on the belief that the separation standards set forth in the Order are antiquated, and are inadequate for *any* facility that attempts to utilize four or more parallel runways simultaneously in low visibility/zero visibility conditions. To me this distinction is important, because it is my belief that this problem is not unique to Detroit.
- Secretary LaHood's response on behalf of the Agency broadens the scope of both Mr. Sugent's and my complaint. DTW asked for clarification regarding the use of Paragraph 5-8-4 in its February 4, 2011 interpretation request, but it was never specifically mentioned in our allegations. Accordingly, additional investigation and analysis of DTW simultaneous operations while applying Paragraph 5-8-4 is required.
- Secretary LaHood indicates in his response on behalf of the Agency that:
 - a. "FAA officials" will review the application of Paragraphs 5-8-3, 5-8-4 and 5-8-5 at DTW and promptly correct any discrepancies, and;
 - b. Central Service Quality Control Group personnel will monitor DTW simultaneous operations and provide feedback to DTW management.

FAA Order 7110.65 problems at DTW are not site specific, but are systemic in nature.

Air traffic controllers are expected to be familiar with the provisions of FAA Order 7110.65. It is a required part of our job duties, and is codified in Paragraph 1-1-1. Paragraph 1-1-1 also instructs controllers to use their "best judgment" when a situation arises that is not covered by a particular rule. The Order does not, however, give instruction to the controllers when ambiguities and/or conflicts are present. Without uniform direction from the national level, facilities (or even individual controllers within a facility) could run identical traffic with markedly different separation and safety standards. This possible variation between application of rules and separation standards places the flying public in an untenable position – namely it is entirely possible that a passenger would potentially be placed in an unsafe situation merely because of which airport they depart from, or what time of day they chose to fly.

The most frustrating aspect of this entire process has been how completely disengaged decision and policy making personnel from the Agency have been since they first became aware of this issue. DTW sent an interpretation request to the Agency in February, 2011 regarding Mr. Sugent's error, and asked for clarification on exactly how DTW should apply Paragraphs 5-8-3, 5-8-4 and 5-8-5, among others. The response from the Agency, as noted by the IG, contained contradictions in how to comply with the 7110.65, and thus DTW requested a second clarification in August. The Agency's response was to refer DTW back to the original answer, even though it still contained contradictions and unclear direction. Once the IG report and findings were submitted, Secretary LaHood's plan of action indicated the Agency would have FAA officials "review the application of Paragraphs 5-8-3, 5-8-4 and 5-8-5 at DTW...and promptly correct any discrepancies necessary to ensure the safe conduct of simultaneous operations using two or more parallel runways" (emphasis added) – yet there has been no direction from anyone outside the facility concerning the correct application of the paragraphs and policies in question. If anything, FAA officials have removed what little guidance and direction they had previously given. Specifically, in a memorandum dated January 25, 2012, the Acting Director for Terminal Safety and Operations Support issued a blanket rescission (See Attachment 1) of the July 15, 2011 memorandum referenced in the IG report, leaving DTW and other facilities with no direction at all.

As an example of why this is important, consider the following - "divergence" is never directly defined in the Order, but it is mentioned in two different contexts.

The first context of "divergence" that controllers will encounter is within the applicable separation rules, such as Paragraphs 5-8-3 and 5-8-5. It is the only context of "divergence" that is pertinent to this complaint. Using the above two rules as examples, controllers separate aircraft by utilizing "divergence," although they are not given textual context of what actually constitutes divergence. They are, however, instructed to "see" numerous figures associated with the text of each respective paragraph to provide illustration of the particular rule. These figures seem to create confusion among controllers, and no clarification of the required standard of separation. This is because every figure shows only one aircraft on a given side of a runway center line, while the text of the respective paragraphs never expressly prohibits both aircraft being in a same direction turn.

The lack of guidance given to controllers over the figures is problematic because controllers are given very clear guidance within the Order about other things where ambiguities may potentially exist. Take radio communications, for example. In Paragraph 1-2-5 (See Attachment 2), "EXAMPLE" and "PHRASEOLOGY" are unequivocally defined. Thus, a controller never has uncertainty about what words are required while making a radio transmission. The Order further clarifies things that could be potentially ambiguous to a pilot in a radio transmission, guiding controllers' word choice where EXAMPLE is used. However, no such guidance is given for any figures contained within the Order, and controllers are left to make assumptions and to guess whether the figure is meant to be incorporated as an extension of the associated paragraph's text.

or whether it is merely an example. The difference between the two conclusions can be significant.

The second context in which a controller would encounter “divergence” in the Order is within Paragraph 1-2-2. (See Attachment 3) This paragraph lists three different types of flight paths, classified as “courses,” that an air traffic controller will encounter in their job duties. The paragraph never directly defines “divergence,” although there is a figure attached to the textual course definitions entitled “Divergence.” For purposes of these comments, Paragraph 1-2-2 is not pertinent.

To illustrate how the lack of national direction can directly affect an operation, DTW controllers rely on Paragraph 5-8-3 when departing two parallel runways simultaneously in low visibility (typically RWY 04R and RWY 03L in a north flow), and rely on Paragraph 5-8-5 to arrive on two parallel runways (typically RWY 04L and RWY 03R) while simultaneously departing.

During on the job training, controllers are taught that if they depart aircraft on parallel runways in a same direction turn utilizing Paragraph 5-8-3 as the basis for separation, an Operational Error has occurred. The controllers are trained in techniques that modify the standard pre-coordinated departure procedures to prevent that situation from occurring.

As an example, in normal visibility (where DTW can provide tower visual), a departure would be assigned its D21 pre-coordinated heading when given take off clearance regardless of which runway it was departing, absent wake turbulence. Therefore, in good visibility, an aircraft could depart RWY 04R while assigned a 360° heading simultaneously with an aircraft departing RWY 03L assigned a 020° heading. However, when the visibility decreases and the controller can no longer provide visual separation, the controllers typically will not allow the aircraft that was assigned the 020° heading in the above example to turn. Instead, they will run the aircraft “straight out” on runway heading (035°), and only allow the aircraft to begin making a left turn after the departure assigned the 360° turns *through* the 020° heading. (See Paragraph 5-5-7, Attachment 4)

For clarification on how and why Paragraph 5-5-7 is pertinent, on 11/25/2011 a controller at DTW was assigned a “Category A” (most serious without a collision) Operational Error under this rule. (See Attachment 5)

To illustrate how aircraft can be in a similar proximity, but have the facility or individual controller directly and unilaterally influence the separation standard, consider operations using Paragraph 5-8-3 with Paragraph 5-8-5 simultaneously. If aircraft were also on final approach in the above example and the training controller were separating departures from arrivals using Paragraph 5-8-5, they would be instructed to allow the departure to turn toward the arrival. Some controllers might instruct their students to not allow departures to turn past a 020° heading, with a later turn airborne, thinking that a missed approach/go around would be assigned a radar vector of 330° and thus would have greater than 30° between the assigned headings. Other instructors

might have their students try to time the departure clearance with an arrival crossing the landing threshold, in a modified version of Paragraph 5-8-4. (See Attachment 6) Regardless of which method an instructor uses, none of the DTW OJTI teaches that a departure turning toward an arrival is a violation of Paragraph 5-8-5, while all of them would universally agree that having two departures in a same direction turn would constitute an Operational Error in violation of Paragraph 5-8-3.

The glaring discrepancy between applying two radar separation rules with aircraft in similar proximity to each other is why the events that led to Mr. Sugent's error occurred. This is precisely the scenario I described above where facilities will interpret rules and procedures to suit their own needs. This is also precisely why this situation is not unique to Detroit or its procedures, but rather, is a national issue that requires national policy. Absent a unified policy on something so basic and fundamental to air traffic (namely, whether two aircraft, less than three miles apart, can be in a same direction turn while utilizing radar separation in a tower environment), the flying public is implicitly having multiple standards of safety and risk tolerance unknowingly and unwillingly forced upon them.

The scope of the complaint of DI-11 1675 and 1677 was expanded by the Secretary's plan of action for the Agency, and thus additional information and investigation is needed.

Although DTW's interpretation request mentions Paragraph 5-8-4, Mr. Sugent and I based our complaint on the north flow at DTW, and specifically on the lack of cohesion between Paragraphs 5-8-3 and 5-8-5. We never mention Paragraph 5-8-4 in our complaint. Secretary LaHood, however, directly mentions the use of Paragraph 5-8-4 in the Agency plan of action.

Utilizing Paragraph 5-8-4 on the north flow, as intimated by the IG investigation ("timing" departures with arrivals), will present additional problems not addressed within the IG report, as Paragraph 5-8-4 has a completely different, and very particular, set of requirement for separation of aircraft than Paragraph 5-8-5.

If Secretary LaHood requires FAA officials to review DTW's application of Paragraph 5-8-4 under the Agency's plan of action, then additional information needs to be gathered. Specifically, since the Secretary asked for a blanket review of DTW's usage of Paragraph 5-8-4, then investigation is required while DTW is also operating on a south flow, as that is when DTW is authorized to use that paragraph for separation.

However, any investigation into the usage of Paragraph 5-8-4 will undoubtedly uncover additional deficiencies in how DTW applies the 7110.65. At DTW, controllers regularly only consider the closest adjacent arrival runway with aircraft on final approach, and not all runways with aircraft on final, as prescribed. Thus, a controller departing an eastbound aircraft off RWY 21R normally only evaluates when to depart RWY 21R based off the aircraft of final for RWY

21L, and they would not take the aircraft on final for RWY 22R into consideration. The controller would take an aircraft on final for RWY 22R into account if the RWY 21R departure were westbound, but there is no standardization among the controllers about how this should be done, and there is no direction from management to clarify the issue.

DTW's application of Paragraph 5-8-4 while on the south flow is another example of my belief that the separation standards in the Order are antiquated and not reflective of operations being run at major airports across the United States. This rule is also another example of why facilities require direction from the Agency to clarify how to correctly apply the rules within the 7110.65.

FAA officials and Quality Control personnel are not complying with the Secretary's plan of action.

My final concern with the IG report and Secretary LaHood's response centers on the inadequate action taken by the Agency. In the Secretary's response, he clearly indicates that FAA officials are to review the application of Paragraphs 5-8-3, 5-8-4 and 5-8-5, and that personnel from Quality Control are to monitor DTW simultaneous operations.

As mentioned above, it is my belief that the Agency has removed what minimal guidance was available concerning Paragraphs 5-8-3, 5-8-4 and 5-8-5 through the rescission of the July 15, 2011 memorandum. It is incredibly frustrating that the Secretary has ordered FAA officials to provide the very same input and feedback that DTW requested in February, 2011. It has been well over two years since Mr. Sugent's error, and a year since DTW first requested assistance, and there is absolutely no progress in evaluating and modifying the operation at DTW.

There also appears to be infighting amongst various Agency officials regarding this issue, as evidenced by the November 8, 2011 email from Susan Ruddy to Walter Tweedy. Although this email was sent prior to the Secretary's plan of action, it highlights how difficult it has been for DTW to get direction from personnel outside the facility, and why I am skeptical that meaningful input will be received by DTW from "FAA officials."

Ultimately, the lack of action taken by the Agency regarding this issue has continued to place the flying public in potentially unsafe situations, something that is patently unacceptable. By refusing to provide guidance and direction on how to correctly apply its own rules and regulations, the Agency is allowing facilities, and sometimes individual controllers, to unilaterally determine what standard of separation should be applied at any given time. The Agency should be embarrassed by this, and should fear what repercussions could arise if a major incident were to occur. I would hope that Agency leadership would want to resolve known safety issues quickly and competently, but the lack of progress makes me wonder about how dedicated some Agency officials truly are to ensuring public safety.

The Secretary also indicated that Quality Control would monitor simultaneous operations and provide feedback. The Secretary does not differentiate between a north or south flow in his plan of action, and also expands the scope of Mr. Sugen's and my complaint to include Paragraph 5-8-4. While there have been Quality Control people observing the operation at DTW, they have only observed the operation on a north flow, and they only appear to be documenting missed approach/go arounds. (See Attachment 7) This is unacceptable, as the Quality Control personnel are only observing a tiny fraction of the required operations and cannot possibly hope to give accurate and complete feedback. If the required research and analysis are incomplete, how can DTW possibly hope to correctly and efficiently modify their present operation to comply with the 7110.65?

Conclusion:

It is my belief that DTW has received no direction from any "Agency official" concerning the application of Paragraphs 5-8-3, 5-8-4 and 5-8-5, and thus the flying public is needlessly being subjected to additional risk because of an apparent standoff of sorts within the Agency. It is also my belief that without clear, uniform guidance from the Agency regarding the correct application of these rules that additional airports of similar size and operation will also needlessly subject the flying public to increased risk. Finally, Quality Control has not obtained required information in the manner prescribed by the Secretary, and thus, any recommendation that might be forthcoming concerning this issue is based on incomplete and/or inaccurate information.

Sincerely and respectfully submitted,

A handwritten signature in black ink, appearing to read "Brian J. Gault". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Brian J. Gault

Summary of Attachments

Attachment 1: January 25, 2012 Memorandum from Acting Director for Terminal Safety

Attachment 2: FAA Order 7110.65 Paragraph 1-2-5

Attachment 3: FAA Order 7110.65 Paragraph 1-2-2

Attachment 4: FAA Order 7110.65 Paragraph 5-5-7

Attachment 5: Awareness Bulletin RE: FAA Order 7110.65 Paragraph 5-5-7 Operation Error

Attachment 6: FAA Order 7110.65 Paragraph 5-8-4

Attachment 7: Notes from Quality Control personnel RE: north flow go arounds

Attachment 1

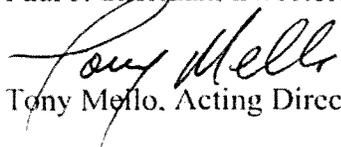


Federal Aviation Administration

Memorandum

Date: JAN 25 2012

To: Paul J. Sheridan, Director, Central Terminal Operations, AJT-C

From:  Tony Mello, Acting Director, Terminal Safety and Operations Support, AJT-2

Subject: Rescind Terminal Safety and Operations Support Response to Request for Interpretation dated July 15, 2011

Terminal Safety and Operations Support (TSOS), AJT-2, is rescinding the interpretation response to your Request for Interpretation to FAA Order 7110.65T, Paragraphs 3-8-2, 5-5-7, 5-8-3, 5-8-4, and 5-8-5, dated February 16, 2011, from the Detroit Airport Traffic Control Tower, pertaining to Detroit Metro Wayne County Airport, Runway 04L and 04R operations.

If you have any questions or need further information, please contact Jeff Camara, Terminal Operations and Procedures, AJT-2A3, at (425) 917-6788.

Attachment



Federal Aviation Administration

Memorandum

Date: JUL 15 2011

To: Paul J. Sheridan
Director, Central Terminal Operations

From: 
for Tony Mello
Acting Director, Terminal Safety and Operations Support

Subject: Request for Interpretation to FAA Order 7110.65T, Paragraphs 3-8-2, 5-5-7, 5-8-3, 5-8-4, and 5-8-5; Your Memo dated February 16, 2011

We have reviewed your request for an interpretation to FAA Order JO 7110.65, Air Traffic Control, Paragraphs 3-8-2, 5-5-7, 5-8-3, 5-8-4, and 5-8-5 and offer the following:

With regard to Item 1 in which you assert that a missed approach aircraft is considered a departure aircraft after crossing or perpendicular with the arrival runway threshold, your assertion is correct with one exception. A missed approach aircraft (like an aircraft cleared for a low approach) is considered a departing aircraft once it crosses that landing threshold. There is no requirement for an aircraft to be perpendicular with the arrival runway threshold.

Regarding Item 2 and your assertion that 30-degree separation may be reduced to 15 degrees for the missed approach aircraft crossing the arrival runway or being perpendicular to it is incorrect. One form of separation must exist at all times and may be discontinued only after a different form of approved separation is attained.

Regarding Item 3 in which you assert that the 30-degree requirement is "determined by the calculated course from the approach end of the runway" is incorrect. The 30-degree requirement is calculated from the missed approach point or the point of arrival at decision height and/or the missed approach fix at a prescribed altitude.

Regarding Item 4 in which you ask, "Verify the climb requirement in the DTW published missed approach procedure for the RWY 04L Z approaches do not influence the point at which the estimated missed approach course is calculated." This assertion is incorrect. The DH on RWY 04L is published as 845 and the approach course is 035. The requirement to climb an additional 455 feet prior to turning certainly influences the missed approach course by insuring additional altitude separation (ROC) and subsequently, additional separation.

Finally, regarding Item 5, we agree with your assertion of "Verify Paragraph 5-5-7 does not apply to departure/departure or departure/arrival operations" with one exception. There is no requirement that an aircraft be a departure/departure or departure/arrival operation to apply this paragraph. However, Paragraph 5-5-7, Passing or Diverging, is an approved form of separation and may be applied to replace a different form of separation until such time as another approved for separation exists.

If you have any questions or desire further information, please contact Robert Law, Terminal Operations and Procedures, at (202) 385-8793.

Attachment 2

1-2-5. ANNOTATIONS

Revised, reprinted, or new pages are marked as follows:

- a. The change number and the effective date are printed on each revised or additional page.
- b. A page that does not require a change is reprinted in its original form.
- c. Bold vertical lines in the margin of changed pages indicate the location of substantive revisions to the order. Bold vertical lines adjacent to the title of a chapter, section, or paragraph means that extensive changes have been made to that chapter, section, or paragraph.
- d. Paragraphs/sections annotated with *EN ROUTE*, *OCEANIC*, or *TERMINAL* are only to be applied by the designated type facility. When they are not so designated, the paragraphs/sections apply to all types of facilities (en route, oceanic, and terminal).
- e. The annotation, *USAF* for the U.S. Air Force, *USN* for the U.S. Navy, and *USA* for the U.S. Army denotes that the procedure immediately following the annotation applies only to the designated service.

REFERENCE-

FAAO JO 7110.65, Para 2.2.2, Military Procedures.

- f. **WAKE TURBULENCE APPLICATION** inserted within a paragraph means that the remaining information in the paragraph requires the application of wake turbulence procedures.
- g. The annotation **PHRASEOLOGY** denotes the prescribed words and/or phrases to be used in communications.

NOTE-

Controllers may, after first using the prescribed phraseology for a specific procedure, rephrase the message to ensure the content is understood. Good judgment must be exercised when using nonstandard phraseology.

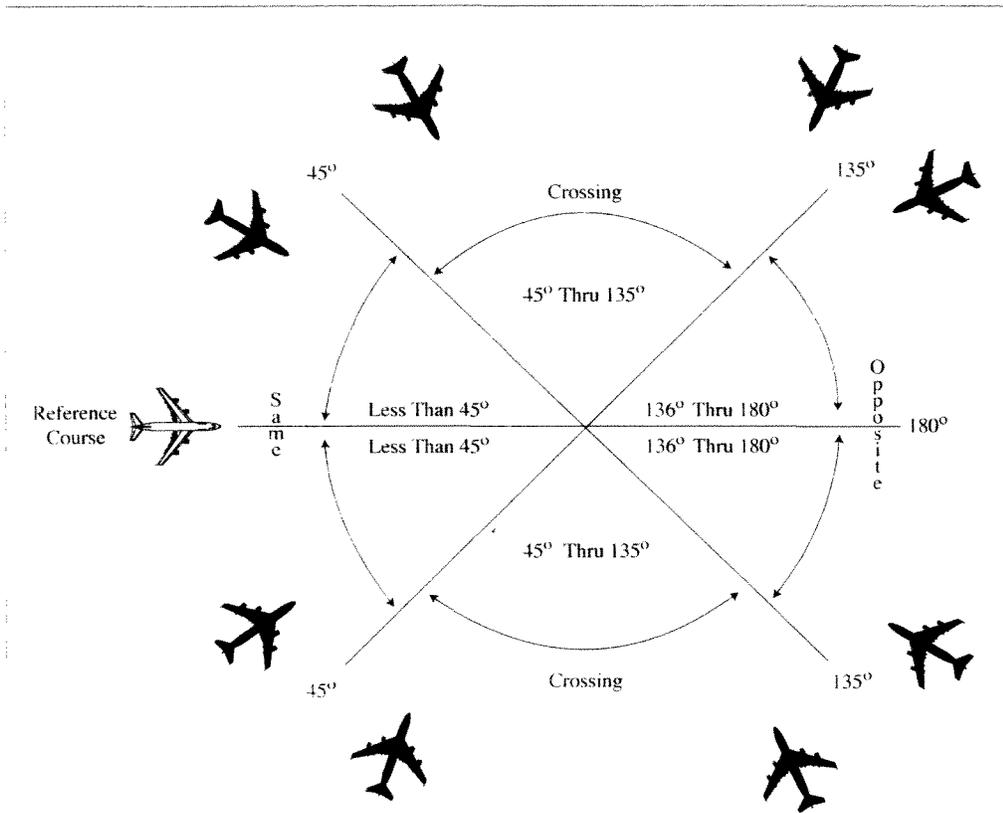
- h. The annotation **EXAMPLE** provides a sample of the way the prescribed phraseology associated with the preceding paragraph(s) will be used. If the preceding paragraph(s) does (do) not include specific prescribed phraseology, the **EXAMPLE** merely denotes suggested words and/or phrases that may be used in communications.

NOTE-

The use of the exact text contained in an example not preceded with specific prescribed phraseology is not mandatory. However, the words and/or phrases are expected, to the extent practical, to approximate those used in the example.

Attachment 3

**FIG 1-2-1
Divergence**



1-2-2. COURSE DEFINITIONS

The following definitions must be used in the application of the separation criteria in this order.

NOTE-

The term "protected airspace," as used in this paragraph, is the airspace equal to one half the required applicable lateral separation on either side of an aircraft along its projected flight path. If the protected airspace of two aircraft does not overlap, applicable lateral separation is ensured.

a. SAME COURSES are courses whose protected airspaces are coincident, overlap, or intersect and whose angular difference is less than 45 degrees. (See [FIG 1-2-1](#).)

b. CROSSING COURSES are intersecting courses whose angular difference is 45 through 135 degrees inclusive. (See [FIG 1-2-1](#).)

c. *OPPOSITE/RECIPROCAL COURSES* are courses whose protected airspaces are coincident, overlap, or intersect and whose angular difference is greater than 135 degrees through 180 degrees inclusive. (See FIG 1-2-1.)

Attachment 4

5-5-7. PASSING OR DIVERGING

a. *TERMINAL*. In accordance with the following criteria, all other approved separation may be discontinued, and passing or diverging separation applied when:

1. Aircraft are on opposite/reciprocal courses and you have observed that they have passed each other; or aircraft are on same or crossing courses/assigned radar vectors and one aircraft has crossed the projected course of the other, and the angular difference between their courses/assigned radar vectors is at least 15 degrees.

NOTE-

Two aircraft, both assigned radar vectors with an angular difference of at least 15 degrees, is considered a correct application of this paragraph.

2. The tracks are monitored to ensure that the primary targets, beacon control slashes, or full digital terminal system primary and/or beacon target symbols will not touch.

REFERENCE-

FAAO JO 7110.65, Para 1-2-2, Course Definitions.

NOTE-

Although all other approved separation may be discontinued, the requirements of para 5-5-4, Minima, subparas e and f must apply when operating behind a heavy jet/B757.

b. *EN ROUTE*. Vertical separation between aircraft may be discontinued when they are on opposite courses as defined in para 1-2-2, Course Definitions; and

1. You are in communications with both aircraft involved; and

2. You tell the pilot of one aircraft about the other aircraft, including position, direction, type; and

3. One pilot reports having seen the other aircraft and that the aircraft have passed each other; and

4. You have observed that the radar targets have passed each other; and

5. You have advised the pilots if either aircraft is classified as a heavy jet/B757 aircraft.

6. Although vertical separation may be discontinued, the requirements of para 5-5-4, Minima, subparas e and f must be applied when operating behind a heavy jet/B757.

EXAMPLE-

“Traffic, twelve o'clock, Boeing Seven Twenty Seven, opposite direction. Do you have it in sight?”

(If the answer is in the affirmative):

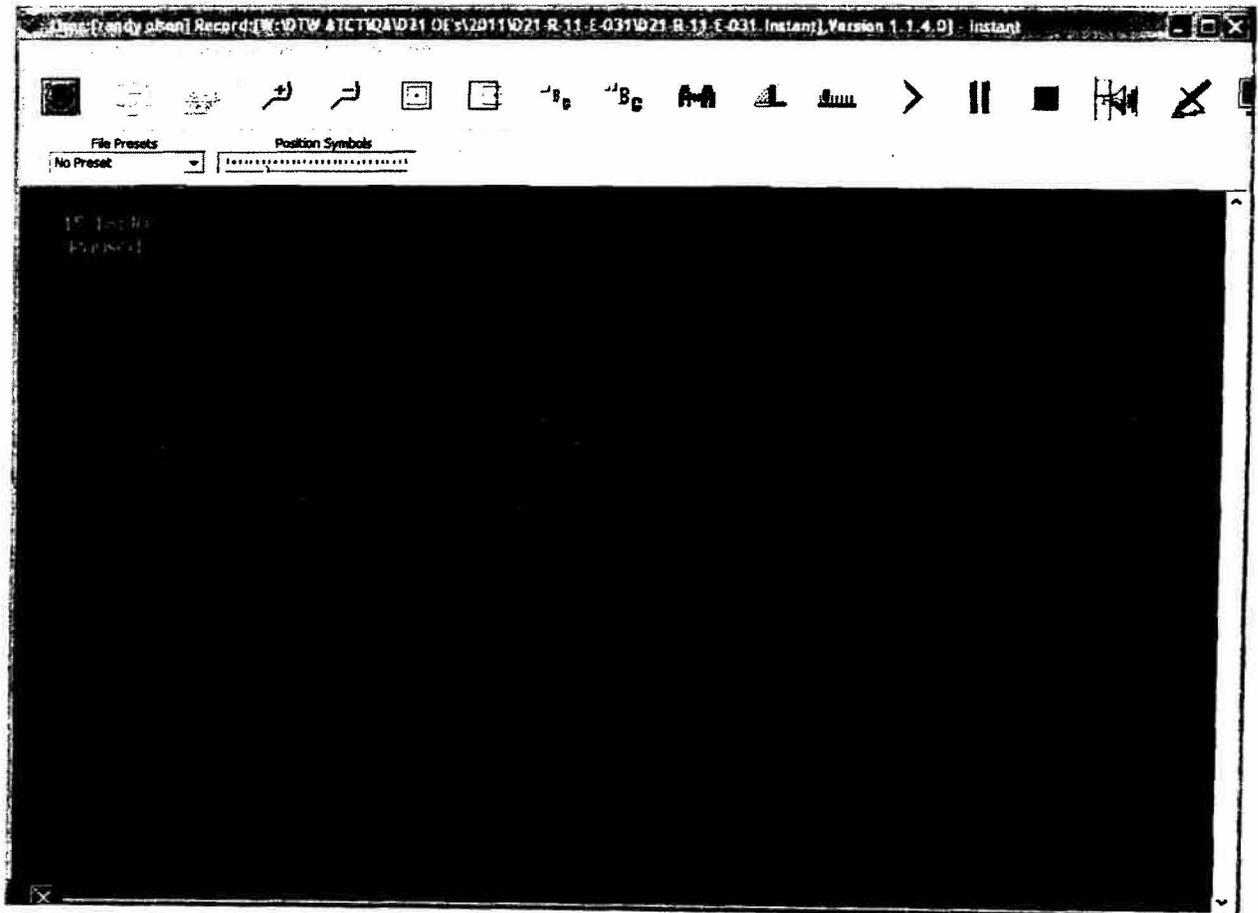
“Report passing the traffic.”

(When pilot reports passing the traffic and the radar targets confirm that the traffic has passed, issue appropriate control instructions.)

Attachment 5

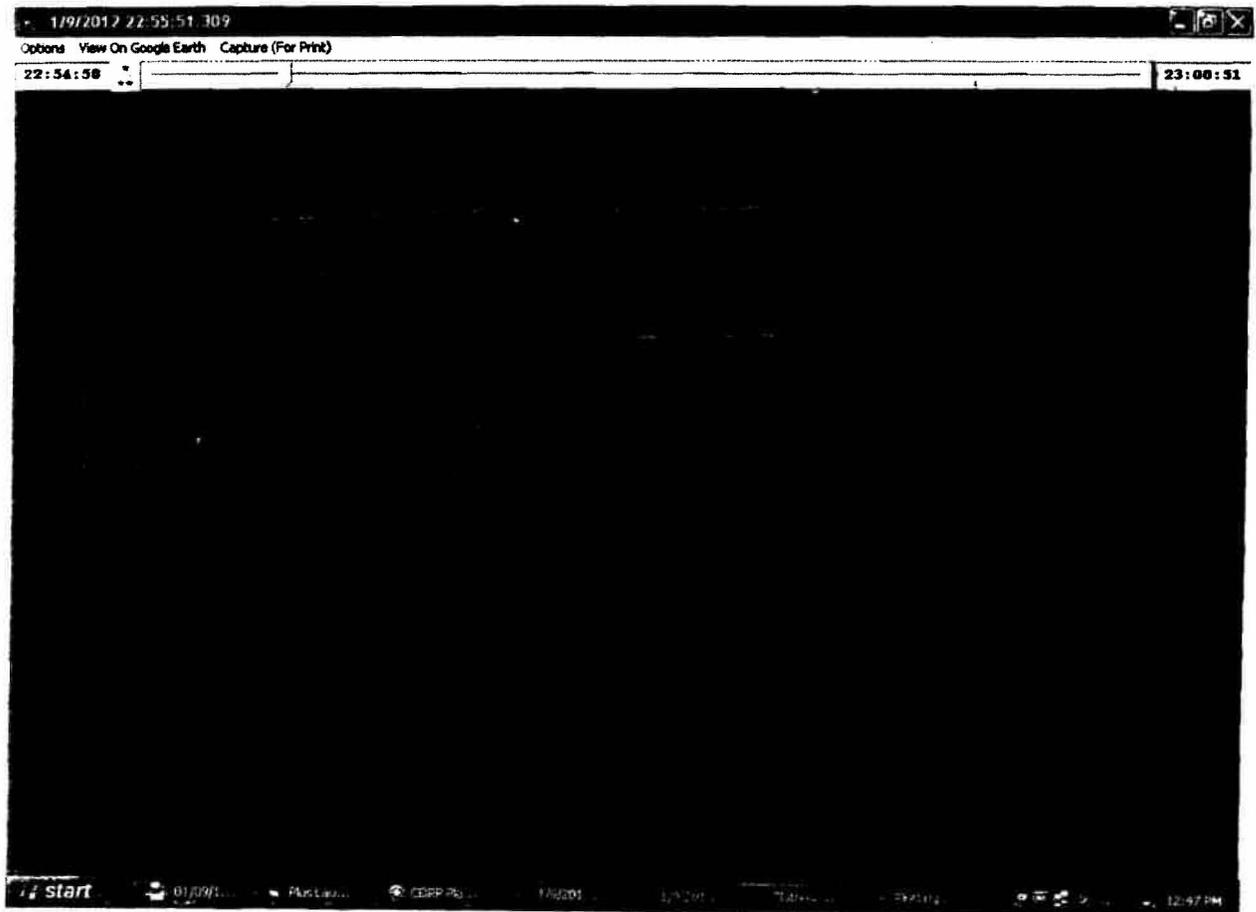
Awareness Bulletin

On 11/25/2011, DTW experienced a Category "A" Operational Error. Locals combined. LNW did not ensure initial departure divergence. DAL1536 departed runway 21L, assigned a 200 degree heading. DAL2289 departed runway 22L, assigned a 185 degree heading. Both aircraft were then switched to D21. Closest proximity 0.93 miles lateral and 100 feet vertical separation.



On 1/9/2012, DTW experienced another Category “A” Operational Error. This occurred during OJT and was a “wake event”.

DAL2133, B752, was departed Runway 21R, assigned a 200 degree heading. Both the CPC-IT and OJT-I failed to detect that DAL2133 was a Boeing Seven Fifty Seven and issued a takeoff clearance to NKS347, same runway, assigned a 185 degree heading. The OJT-I recognized the problem once DAL2133 “tagged up”, however it was too late to do anything. The OJTI-I tried to turn NKS347 but they had already switched over to D21. Closest proximity was 2.19 miles lateral and two hundred feet vertical separation.



Please see your FLM or contact the QA Department if you have any immediate questions or concerns.

Attachment 6

5-8-4. DEPARTURE AND ARRIVAL

TERMINAL. Except as provided in para 5-8-5, Departures and Arrivals on Parallel or Nonintersecting Diverging Runways, separate a departing aircraft from an arriving aircraft on final approach by a minimum of 2 miles if separation will increase to a minimum of 3 miles (5 miles when 40 miles or more from the antenna) within 1 minute after takeoff.

NOTE-

- 1. This procedure permits a departing aircraft to be released so long as an arriving aircraft is no closer than 2 miles from the runway at the time. This separation is determined at the time the departing aircraft commences takeoff roll.*
- 2. Consider the effect surface conditions, such as ice, snow, and other precipitation, may have on known aircraft performance characteristics, and the influence these conditions may have on the pilot's ability to commence takeoff roll in a timely manner.*

Attachment 7

Office DEPOT.

green

LNW # 210

LINE # 200

0900 060/3 3/4 BK VV002
SIMUL 1350-1400

1448Z EGF4343 RWY NOT IN SIGHT 3L
NTRG, REST 4R DEPT ESTABLISHED
EGF4343 TL^{SP} - DIVERT

1000 L 050/4 1/4 FG VV002
1011 L 040/4 1/16 FG VV002 TURN VS 1/4
(SL CLSD ALL DEPTS 4R SMGS PRO)

1100 L 060/3 0 FG VV001

1609Z DAL1640 RWY NOT IN SIGHT 3R 090°
Com 2885 4R 060 RTN for LAND, 2R

1629Z ASQ5312 RWY NOT IN SIGHT 4R NO DEPTS
RTN for LAND, 2R