Nov. 28, 1994
Mr. Tom Young, Chairman
Charting and Instrument Procedures Committee
Air Line Pilots Association
535 Herndon Parkway
Herndon, VA 22070

Dear Mr. Young

This is a clarification of our response to your letter of August 23, 1993. In that letter you requested an interpretation of Section 91.175 of the Federal Aviation Regulation (FAR) (14 CFR Section 91.175). You address the necessity of executing a complete Standard Instrument Approach Procedure (SIAP) in a non-radar environment while operating under Instrument Flight Rules (IFR). Our response assumes that each of the specific scenarios you pose speaks to a flight conducted under IFR in a non-radar environment.

Section 91.175(a) provides that unless otherwise authorized by the Administrator, when an instrument letdown to a civil airport is necessary, each person operating an aircraft, except a military aircraft of the United States, shall use a standard instrument approach procedure prescribed for the airport in Part 97.

First you ask whether an arriving aircraft must begin the SIAP at a published Initial Approach Fix (IAF). A pilot must begin a SIAP at the IAF as defined in Part 97. Descent gradients, communication, and obstruction clearance, as set forth in the U.S. Standard for Terminal Instrument Approach Procedures (TERPs), cannot be assured if the entire procedure is not flown.

You also ask whether a Distance Measuring Equipment (DME) arc initial approach segment can be substituted for a published IAF along any portion of the published arc. A DME arc cannot be substituted for a published IAF along a portion of the published arc. If a feeder route to an IAF is part of the published approach procedure, it is considered a mandatory part of the approach.

Finally, you ask whether a course reversal segment is optional "when one of the conditions of FAR section 91.175(j) is not present." Section 91.175(j) states that in the case of a radar vector to a final approach course or fix, a timed approach from a hold ng fix, or an approach for which the procedures specifies "no procedure turn," no pilot may make a procedure turn unless cleared to do so by ATC.

Section 97.3(p) defines a procedure turn, in part, as a maneuver prescribed when it is necessary to reverse direction to establish the aircraft on a intermediate or final approach course. A SIAP may or may not prescribe a procedure turn based on the application of certain criteria contained in the TERPs. However, if a SIAP does contain a procedure turn and ATC has cleared a pilot to execute the SIAP, the pilot must make the procedure turn when one of the conditions of Section 91.175(j) is not present.

If you have any questions regarding this matter, please contact Patricia R. Lane, Manager, Airspace and Air Traffic Law Branch, at (202) 267-3491.

Sincerely,

/s/
Patricia R. Lane
for Donald P. Byrne
Assistant Chief Counsel
Regulations Division
March 11, 1994