

Advance Copy - FAA WATRS Plus Ops Policy/Procedures Notice Update

This is an update to the FAA WATRS Plus Operational Policy/Procedures Notice dated 10 May 2008 that is currently posted in the FAA Domestic/International NOTAM Book, Part 3 (International), Section 2 (International Oceanic Airspace Notices). This update will be posted in the 31 July edition of the NOTAM Book. Address: http://www.faa.gov/airports_airtraffic/air_traffic/publications/notices/

WATRS PLUS ROUTE STRUCTURE REDESIGN & SEPARATION REDUCTION

OPERATIONAL POLICY AND PROCEDURES

Introduction. On 5 June 2008, the FAA implemented a redesigned route structure, a reduced lateral separation standard and associated operational policies on oceanic routes or areas in the WATRS Plus Control Areas (CTA).

Background. In 1998, lateral separation was reduced to 50 NM in conjunction with the introduction of Required Navigation Performance 10 (RNP 10) for aircraft operating in the North Pacific Route System. Since that time, application of 50 NM lateral separation and RNP 10 has been expanded throughout the Pacific Flight Information Regions (FIR) and other global oceanic airspace. The WATRS Plus initiative applied the experience gained in those operations.

CTAs Affected.

- Route structure redesign and 50 NM lateral separation was implemented in the following CTAs:
 - the Atlantic portion of the Miami Oceanic CTA
 - the San Juan CTA/FIR and
 - the West Atlantic Route System (WATRS).
- New York Oceanic airspace outside of WATRS is transition airspace. 50 NM lateral separation may be applied in this airspace between aircraft authorized RNP 10 or RNP 4.

Note: the WATRS Plus route structure redesign chart is posted on the WATRS Plus Webpage.

Project Objectives. The WATRS Plus project: _

- Reduced lateral separation on oceanic routes or areas from 90 NM to 50 NM between aircraft authorized RNP 10 or RNP 4.
- Has over 95% of WATRS Plus flights conducted by operators/aircraft that have been authorized RNP 10 or RNP 4 by the appropriate State (country) authority.
- Accommodates operation of the small percentage of flights not meeting the RNP 10 minimum requirement. See paragraph below and paragraph 4 for further explanation.
- Redesigned the WATRS Plus route structure to make approximately 40% more routes available to enhance operator access to time/fuel efficient routes and altitudes and to enhance en-route capacity.
- Harmonized the WATRS Plus route structure with that in the Caribbean and North Atlantic regions.

Proposal to Require, On Date To Be Determined, RNP 10 or RNP 4 Authorization Between

Flight Level 290-410 (inclusive). The FAA is planning to propose a change that would be effective on a date to be determined, but **after** the June 2008 project implementation date. The proposal will likely be to require RNP 10 or RNP 4 authorization for cruise operations on oceanic routes or areas in the WATRS Plus CTAs between FL 290-410 (inclusive). RNP 10 and RNP 4 authorization requires equipage with at

least two Long Range Navigation Systems (LRNS). The content of and effective date for the change is planned to be coordinated with the U.S. and international aviation community and will probably require a revision to FAA regulations.

Table of Contents. The following is a list of the major paragraphs that follow:

1. WATRS Plus Webpage: Policy, Procedures and Guidance For Operators and Regulators
2. Lateral Separation Standards To Be Applied
3. Operation On Routes Within the WATRS CTAs Not Requiring RNP 10 or RNP 4 Authorization
4. Provisions For Accommodation of NonRNP10 Aircraft (Aircraft Not Authorized RNP 10 or RNP 4)
5. Operator Action
6. RNP 10 or RNP 4 Authorization: Policy and Procedures for Aircraft and Operators
7. Flight Planning Requirements
8. Pilot and Dispatcher Procedures: Basic and In-flight Contingency Procedures
9. Flight Of Aircraft Previously Authorized RNP 10 Or RNP 4 With One Long-Range Navigation System Operational
10. Contacts For Questions
11. FAA Project Leads

OPERATIONAL POLICY AND PROCEDURES

1. WATRS Plus Webpage: Policy, Procedures and Guidance For Operators and Regulators.

Information on WATRS Plus plans, policies and procedures is posted on the “WATRS Plus Webpage”. The WATRS Plus Webpage is linked to the “Oceanic and Offshore Operations” Homepage at:

www.faa.gov/about/office_org/headquarters_offices/ato/service_units/enroute/oceanic/

The Webpage contains detailed guidance on operator and aircraft authorization for RNP 10 or RNP 4 including Job Aids with references to FAA and ICAO documents.

2. Lateral Separation Standards To Be Applied

- a. 50 NM lateral separation is applied in the WATRS Plus CTAs between aircraft authorized RNP 10 or RNP 4 operating at any altitude above the floor of controlled airspace.
- b. 50 NM lateral separation is applied in the New York Oceanic CTA/FIR outside of WATRS between aircraft authorized RNP 10 or RNP 4 operating at any altitude above the floor of controlled airspace.
- c. Within the WATRS Plus CTAs, the lateral separation standard applicable to NonRNP10 aircraft is 90 NM.
- d. Policies for application of other lateral separation standards in airspace outside the WATRS Plus CTAs are not affected.

3. Operation On Routes Within the WATRS Plus CTAs Not Requiring RNP 10 or RNP 4

Authorization. Operation on certain routes that fall within the boundaries of WATRS Plus CTAs is not affected by the introduction of RNP 10 and 50 NM lateral separation. Operation on the following routes is **not** affected:

- a. Routes that are flown by reference to ICAO standard ground-based navigation aids (VOR, VOR/DME, NDB), such as the routes in the airspace between Florida and Puerto Rico.
- b. Routes that are located within radar and VHF coverage. New WATRS Plus route segments M201 between BAHAA and PAEPR and L453 between PAEPR and AZEZU have replaced A761 between HANRI and ETOCA and R511 between ELTEE and AZEZU. **At and above FL 310**, the new route segments are within radar and VHF coverage. Operations at and above FL 310 on these route segments does not require RNP 10 or RNP 4 authorization and remains the same as those conducted on the old A761 and R511 route segments. Pilots shall not apply Strategic Lateral Offset Procedures (SLOP) on these route segments.
- c. Special Area Navigation (RNAV) routes located in the airspace between Florida and Puerto Rico. The old “T-routes” were re-designated as “Y-routes” on 5 June 2008. **These special RNAV routes are not part of the WATRS Plus route structure.** A Notice entitled “Special RNAV Routes Between Florida and Puerto Rico: Change From T-routes to Y-routes On 5 June 2008” is posted on the WATRS Plus

Webpage. It is published in the FAA Domestic/International NOTAM Book. The Notice provides updated policy and procedures for Y-route operations.

4. Provisions for Accommodation of NonRNP10 Aircraft (Aircraft Not Authorized RNP 10 or RNP 4). Operators of NonRNP10 aircraft shall follow the practices detailed in 4a and 4b below.

a. Operators of NonRNP10 aircraft shall annotate ICAO flight plan Item 18 as follows:

“STS/NONRNP10” (**no space between letters and numbers**).

b. Pilots of NonRNP10 aircraft that are flight planned to operate or are operating **on WATRS Plus “L” and “M” routes** shall report the lack of authorization by stating “**Negative RNP 10**” in the:

- Atlantic portion of the Miami Oceanic CTA
- New York Oceanic CTA/FIR
- New York Atlantic High Offshore Airspace
- San Juan CTA/FIR
 - on initial call to ATC and...
 - in read back of clearance to descend from FL 410 and above. (See paragraph 4e below).
 - if approval status is requested by the controller. (See paragraph 8h below).

c. Operators of NonRNP10 aircraft shall **not** annotate ICAO flight plan Item 18 (Other Information) with “NAV/RNP10” or “NAV/RNP4”, as shown in paragraph 7, if they have **not** obtained RNP 10 or RNP 4 authorization.

d. NonRNP10 operators/aircraft are able to file most WATRS Plus routes at any altitude. Some routes, however, may require special routing for NonRNP 10 aircraft. Check the WATRS Plus Webpage for related FAA Notices. NonRNP 10 operators are cleared to operate on preferred routes and altitudes as traffic permits. Aircraft that are authorized RNP 10 or RNP 4, however, will have a better opportunity of obtaining their preferred altitude and route because the 50 NM lateral separation standard is applied to those aircraft. 50 NM lateral separation is not applied to NonRNP10 aircraft.

e. NonRNP10 aircraft retain the option of climbing to operate at altitudes above those where traffic is most dense (i.e., at/above FL 410). To minimize the chance of conflict with aircraft on adjacent routes, NonRNP10 aircraft should plan on completing their climb to or descent from higher FLs within radar coverage.

g. All aircraft can enhance their opportunity to be cleared on their preferred route and altitude if they operate at non-peak hours, approximately 0100 to 1100 UTC.

5. Operator Action. Operators capable of meeting RNP 10 or RNP 4 that operate on oceanic routes or areas in WATRS Plus CTAs between flight level (FL) 290-410, where competition for routes and altitudes is greatest, should obtain authorization for RNP 10 or RNP 4 and annotate the ICAO flight plan in accordance with paragraph 7. The FAA also strongly recommends that operators flying on oceanic routes or areas above or below those FLs obtain RNP 10 or RNP 4 authority to enhance their operational flexibility.

6. RNP 10 or RNP 4 Authorization: Policy and Procedures For Aircraft and Operators

a. In accordance with ICAO guidance, RNP 10 and RNP 4 are the only navigation specifications (nav specs) applicable to oceanic and remote area operations. (See note below). Other RNAV and RNP nav specs are applicable to continental en route, terminal area and approach operations.

Note: “RNP navigation specification” (e.g., RNP 10) is the term adopted in the new ICAO Performance Based Navigation (PBN) Manual (Doc 9613). It replaces the term “RNP type”.

b. **Responsible State Authority (ICAO Guidance).** The following is ICAO guidance on the State authority responsible for authorizations such as RNP 10, RNP 4 and RVSM.

- International Commercial Operators. The State of Registry makes the determination that the aircraft meets the applicable RNP requirements. The State of Operator issues operating authority (e.g., Operations Specifications (OpSpecs)).
- International General Aviation (IGA) Operators. The State of Registry makes the determination that aircraft meets the applicable RNP requirements and issues operating authority (e.g., Letter of Authorization (LOA)).

c. **FAA Documents.** The guidance and direction of FAA Order 8400.12 (as amended) (RNP 10 Operational Approval) will be used to grant RNP 10 authorization to operators and aircraft for which the FAA is responsible. FAA Order 8400.33 (as amended) (Procedures For Obtaining Authorization For RNP 4 Oceanic/Remote Area Operations) will be used to authorize RNP 4. The FAA RNP 10 and RNP 4 orders are consistent with the ICAO PBN Manual guidance discussed below. FAA and ICAO documents are posted on the WATRS Plus Webpage.

d. **ICAO Performance Based Navigation (PBN) Manual (new Doc 9613).** In a letter to States dated 27 April 2007, ICAO urged States to use the *ICAO Performance Based Navigation (PBN) Manual* to establish approval policies and processes for RNP and RNAV operations. RNP 10 guidance is provided in Volume II, Part B; Chapter 1. RNP 4 guidance is in Volume II, Part C; Chapter 1. The ICAO State letter with Volume II attached is posted on the WATRS Plus Webpage.

e. **RNP 10 and RNP 4 Job Aids.** Operators and authorities should use the RNP 10 or RNP 4 Job Aids posted on the WATRS Plus Webpage. These Job Aids address the operational and airworthiness elements of aircraft and operator authorization and provide references to appropriate documents. One set of RNP 10 and RNP 4 Job Aids provides references to FAA documents and another set provides references to ICAO documents. The Job Aids provide a method for operators to develop and authorities to track the operator/aircraft program elements required for RNP 10 or RNP 4 authorization.

f. **Requirement For Equipage With At Least Two Long-Range Navigation Systems (LRNS) Meeting RNP 10 or RNP 4 Standards.** See “Acceptable Navigation System Configurations” in Section 2 of the WATRS Plus Webpage (Operator/Aircraft RNP 10 Authorization Policy/Procedures). RNP 10 and RNP 4 authorization require aircraft equipage with at least two LRNS with functionality and display adequate for the operation. The guidance referenced above provides a detailed discussion of acceptable aircraft LRNS configurations for operation in WATRS Plus oceanic airspace on/after

5 June 2008.

Note: see paragraph 8c for policy on LRNS failure or malfunction enroute.

g. **RNP 10 Time Limit For INS or IRU Only Equipped Aircraft.** Operators should review their Airplane Flight Manual (AFM), AFM Supplement or other appropriate documents and/or contact the airplane or avionics manufacturer to determine the RNP 10 time limit applicable to their aircraft. They will then need to determine its effect, if any, on their operation. Unless otherwise approved, the basic RNP 10 time limit is 6.2 hours between position updates for aircraft on which Inertial Navigation Systems (INS) or Inertial Reference Units (IRU) provide the only source of long range navigation. **Extended RNP 10 time limits of 10 hours and greater are already approved for many IRU systems.**

7. **Flight Planning Requirements.** Operators shall make ICAO flight plan annotations in accordance with this paragraph **and**, if applicable, paragraph 4.

a. **ICAO Flight Plan Requirement.** ICAO flight plans shall be filed for operation on oceanic routes and areas in the WATRS Plus CTAs.

b. **ICAO Flight Plan AFTN Addressing For Operations in the New York Oceanic CTA/FIR** (including WATRS). **All** flights entering the New York Oceanic CTA/FIR shall address flight plans to **KZWYZOZX**. **All** flights entering the New York Oceanic CTA/FIR **and** a U.S. ARTCC (except Boston) and/or Bermuda airspace shall address flight plans to **both KZWYZOZX and** the appropriate U.S. ARTCC. (See table below). If operators do not address flight plans to **KZWYZOZX**, 50 NM lateral separation cannot be applied to them.

<u>Airspace To Be Entered:</u> New York Oceanic CTA/FIR and U.S. ARTCCs	<u>Required AFTN addresses</u>
New York (NY) Oceanic CTA/FIR	KZWYZOZX
Boston ARTCC & NY Oceanic	KZWYZOZX only. (This change confirmed on 19 June 08).
NY domestic and/or Bermuda & NY Oceanic	KZNYZQZX & KZWYZOZX
Washington (KZDC) & NY Oceanic	KZDCZQZX & KZWYZOZX
Jacksonville (KZJX) & NY Oceanic	KZJXZQZX & KZWYZOZX
Miami (KZMA) & NY Oceanic	KZMAZQZX & KZWYZOZX
San Juan & NY Oceanic	TZSUZRZX & KZWYZOZX

c. **To inform ATC and to key Ocean21 automation that they have obtained RNP 10 or RNP 4 authorization and are eligible for 50 NM lateral separation, operators shall:**

- (1) annotate ICAO Flight Plan Item 10 (Equipment) with the letters “R” and “Z” and...
- (2) annotate Item 18 (Other Information) with, as appropriate, “NAV/RNP10” or “NAV/RNP4” (**no space between letters and numbers**).

Note: see paragraphs 7f and 7g below! They provide recommended filing practices for domestic U.S. RNAV operations and filing with Eurocontrol.

d. 50 NM lateral separation will only be applied to operators/aircraft that annotate the ICAO flight plan in accordance with this policy.

e. **Operators that have not obtained RNP 10 or RNP 4 authorization shall not annotate ICAO flight plan Item 18 (Other information) with “NAV/RNP10” or “NAV/RNP4”, but shall follow the practices detailed in paragraph 4 of this notice.**

Note: on the ICAO Flight Plan, letter “R” indicates that the aircraft will maintain the appropriate RNP navigation specification for the entire flight through airspace where RNP is prescribed. Letter “Z” indicates that information explaining aircraft navigation and/or communication capability is found in Item 18.

f. **Recommendation For Filing To Show Domestic U.S. RNAV and Oceanic RNP Capabilities.**

(1) **Explanation.** The initiative discussed in this paragraph was implemented on 29 June 08. See the project website for details (address below). On 29 June 2008, the FAA implemented a program to enhance operators’ capability to communicate their domestic US RNAV capabilities to ATC by requiring an entry following the NAV/ indicator in item 18 of the ICAO flight plan. The initiative has provisions for showing RNAV capabilities for departure (“D”), enroute (“E”) and arrival (“A”) with RNAV accuracy values. An example item 18 entry is: NAV/RNVD1E2A1. The numerals in the example indicate RNAV 1 and RNAV 2 accuracy. The website for this initiative is at: http://www.faa.gov/about/office_org/headquarters_offices/ato/service_units/enroute/flight_plan_filing/

(2) **Recommendation.** It is recommended that operators show their RNAV capability for domestic U.S. and capabilities for oceanic operations (RNP 10 or RNP 4) by filing: “NAV/”, then the domestic US alphanumeric sequence, **then a mandatory space** and then “RNP10” or “RNP4”, as appropriate. The following is an example: “NAV/RNVD1E2A1 RNP10”

g. **Caution For Westbound Flights From Europe.**

(1) **Alphanumeric Character Limitation.** As of 27 May 2008, operators may enter up to 50 characters after the “NAV/” indicator in flight plan item 18 for flight plans filed with Eurocontrol.

(2) **Multiple NAV/ Entries.** Operators should be aware that if they make multiple “NAV/” entries in a flight plan filed with Eurocontrol, only the last “NAV/” entry will be forwarded. For example, if “NAV/D1E2A1” and “NAV/RNP10” are entered, only “NAV/RNP10” will be forwarded.

(3) **Recommendation.** Item 18 entries made in accordance with paragraph 7f (2) above will limit the number of characters needed to show domestic U.S. RNAV and oceanic RNP capabilities and mitigate the chance that one or the other will not be forwarded for use by FAA domestic and oceanic automation systems.

8. Pilot and Dispatcher Procedures: Basic and In-flight Contingency Procedures

a. **General.** Operator applications/programs for RNP 10 or RNP 4 authorization must address operational and airworthiness policy and procedures related to WATRS Plus route structure redesign and 50 NM lateral separation implementation. The RNP 10 and RNP 4 Job Aids posted on the WATRS Webpage contain sections on pilot and, if applicable, dispatcher training/knowledge and on operations manuals or comparable operations documents. The Job Aids also provide references to source documents.

b. **Basic Pilot Procedures.** The RNP 10 and RNP 4 Job Aids contain references to pilot and, if applicable, dispatcher procedures contained in:

- FAA Order 8400.12A (RNP 10), Appendix 4 (Training Programs and Operating Practices and Procedures)
- FAA Order 8400.33 (RNP 4): paragraph 9 (Operational Requirements) and paragraph 10 (Training Programs, Operating Practices and Procedures)
- ICAO PBN Manual, Volume II, Part B, Chapter 1 (RNP 10): paragraphs 1.3.4, 1.3.5 and 1.3.6
- ICAO PBN Manual, Volume II, Part C, Chapter 1 (RNP 4): paragraphs 1.3.4, 1.3.5 and 1.3.6

c. **LRNS Failure or Malfunction After Entry Onto WATRS Plus Oceanic Routes or Areas.** The following is WATRS Plus CTA policy for LRNS failure or malfunction enroute:

(1) To conduct operations as an RNP 10 or RNP 4 operator/aircraft, at least two RNP 10 or RNP 4 authorized LRNSs shall be operational at entry on to oceanic route segments or areas in the WATRS Plus CTAs. **(See paragraph 9 for pilot actions in situations where only one LRNS is determined to be operational prior to entry on to oceanic route segments or areas in the WATRS Plus CTAs).**

(2) After entry on to an oceanic route segment or area within the WATRS Plus CTAs, if an LRNS fails or malfunctions and only one LRNS remains operational, the pilot shall inform ATC. ATC will acknowledge and monitor the situation. The aircraft may continue on the cleared route provided that, in the pilot's judgment, the remaining LRNS will enable the aircraft to be navigated within approximately 10 NM of the cleared route centerline. If that is not the case, then paragraph (3) below applies.

(3) If, in the pilot's judgment, the aircraft cannot be navigated within approximately 10 NM of the cleared route centerline:

- i. the pilot shall advise ATC of the situation and coordinate a course of action
- ii. the pilot shall: consider the best option to maintain the safety of the operation (e.g., continuing on route or turning back); whenever possible obtain an ATC clearance before deviating from cleared route or flight level and keep ATC advised.
- iii. ATC will establish an alternative separation standard as soon as practicable, coordinate the safest course of action with the pilot and monitor the situation.
- iv. if coordination with ATC cannot be accomplished within a reasonable period of time, the pilot should consider climbing or descending 500 feet, broadcasting action on 121.5 and advising ATC as soon as possible.

d. **In-flight Contingency Procedures (e.g., Rapid Descent, Turn-back, Diversion).** In-flight contingency procedures for oceanic airspace now published in FAA Notices, posted on the WATRS Plus Website and published in ICAO Document 4444 must be emphasized in pilot training/knowledge programs. The published procedures are applicable to the WATRS Plus CTA reduction of lateral separation from 90 NM to 50 NM. The full text of the in-flight contingency procedures is published on the WATRS Plus Webpage under “Operating Policy” in Section 2.

e. **Special Emphasis: Maneuvering to Avoid Convective Weather in a 50 nm Separation Environment.** Pilots are required to maneuver (deviate) around convective weather on a regular basis in the course of WATRS Plus operations. Weather deviation procedures, therefore, must be emphasized in accordance with the following:

- Pilot training/knowledge programs and operations manuals or comparable operations documents must emphasize weather deviation procedures as published in FAA Notices and ICAO Document 4444 and posted under “**Operating Policy**” in Section 2 of the WATRS Plus Website. Weather deviation procedures are addressed in the RNP 10 and RNP 4 Job Aids. In addition, a pilot bulletin/aid for understanding and executing weather deviation procedures is posted under “Operating Policy” in Section 2 of the WATRS Plus Webpage.
- It is imperative that pilots keep ATC advised of their intentions during the initial weather avoidance maneuver and any subsequent maneuvers to avoid convective weather.
- For distress or urgent situations, direct Air/Ground and Ground/Air satellite telephone service (SATVOICE) is available for communication with New York Oceanic, San Juan Center and ARINC. (See the WATRS Plus Webpage for details).
- Pilots must be aware of the provision to climb or descend 300 feet (depending on the direction of flight and direction of deviation from track) to mitigate the chance of conflict with other aircraft **when forced to deviate without a clearance.**
- It is recommended that, if equipped, the Airborne Collision Avoidance System (ACAS (TCAS)) be operational. ACAS provides a valuable tool to alert the pilot to the presence and proximity of nearby aircraft in weather deviation situations.

f. **Strategic Lateral Offset Procedures (SLOP).** Pilots should use SLOP procedures in the course of regular oceanic operations. SLOP procedures are published in FAA Notices, posted under “Operating Policy” in Section 2 of the WATRS Plus Webpage and published on ICAO Document 4444. SLOP is addressed in the RNP 10 and RNP 4 Job Aids.

g. **Pilot Report of NonRNP10 Status.** The pilot shall report the lack of RNP 10 or RNP 4 status in accordance with the following:

- when the operator/aircraft is not authorized RNP 10 or RNP 4. **See paragraph 4.**
- if approval status is requested by the controller in accordance with paragraph 8h below.

- when an operator/aircraft previously granted RNP 10 or RNP 4 authorization is operating with only one operational LRNS. **See paragraph 9.**

h. Pilot Statement of RNP 10 or RNP 4 Approval Status, If Requested. If requested by the controller, the pilot shall communicate approval status using the following phraseology:

Controller Request	Pilot Response
(call sign) confirm RNP 10 or 4 approved	“Affirm RNP 10 approved” or “Affirm RNP 4 approved”, as appropriate, or... “Negative RNP 10” (See paragraph 4 for NonRNP10 aircraft procedures).

9. Flight Of Aircraft Previously Authorized RNP 10 Or RNP 4 With One Long-Range Navigation System Operational

a. To the maximum extent possible, operators that are authorized RNP 10 or RNP 4 should operate on WATRS Plus oceanic routes in compliance with those standards. If the situation warrants, however, operators may fly an aircraft on WATRS Plus oceanic routes with one LRNS operational. The intent of this policy is to allow an aircraft to complete the flight to its destination and/or be flown to a location for repair. For U.S. operators conducting operations under Part 121, 125 or 135 of the Code of Federal Regulations, Operations Specifications paragraph B054 (Class II (Oceanic) Navigation Using Single Long-Range Navigation System) applies.

b. **One LRNS Operational Prior to Takeoff For Flight Into WATRS Plus Oceanic Routes or Areas.** In the situation where only one LRNS is determined to be operational prior to takeoff, operators shall follow the practices detailed in paragraph 4 (Provisions For Accommodation of NonRNP10 Aircraft) (i.e., ICAO flight plan item 18 annotation and pilot report to ATC of aircraft NonRNP10 status). The aircraft will be treated as NonRNP10 aircraft and appropriate lateral separation will be applied.

c. **Failure or Malfunction of LRNS Enroute, One LRNS Operational Prior to Entering a WATRS Plus CTA.** In the situation where at least two LRNS are operational at takeoff, but LRNS failure or malfunction occurs en route and only one LRNS remains operational, the pilot shall take action to inform ATC. Approximately 175-125 NM prior to entering a WATRS Plus CTA, the pilot shall report to ATC that only one LRNS is operational and request that ATC amend the flight plan item 18 entry to delete “NAV/RNP10” or “NAV/RNP4” and enter “STS/NONRNP10” in accordance with paragraph 4a. In addition, after entering on to a WATRS Plus oceanic route or area, the pilot shall report the “NonRNP10” status of the aircraft in accordance with paragraph 4b.

10. Contacts For Questions. If there are questions or requests, one of the following may be contacted and a response will be coordinated with the appropriate FAA subject matter expert, if necessary:

Roy Grimes	FAA Support. Flight Standards Specialist, CSSI, Inc.	+1 202-863-3692	RGrimes@cssiinc.com
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11. FAA Project Leads. The FAA project leads are:

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