**National Wildfire
Coordinating Group**
National Interagency Fire Center
3833 S. Development Avenue
Boise, Idaho 83705
National Coordination System Committee
NCSC

NCSC MEMORANDUM # 22-04

To: **NWCG Executive Board**

CC: **National Interagency Aviation Committee**

From: **National Coordination System Committee**

Date: **05/16/2022**

Re: **USFS FSH 5709.16 32.22 Aircraft/Aviation Dispatchers Revision**

Purpose:

Elevate impacts the USFS 5709.16 Ch 32.2 Aircraft/Aviation Dispatch revision implemented January 1, 2022, is having on interagency dispatch centers and their ability to support aviation operations.

Background:

Starting January 1, 2022, all Forest Service personnel dispatching aircraft dispatch centers and geographic area coordination centers are required to be qualified as an Aircraft Dispatcher (ACDP). Regions may supplement this implementation plan but cannot extend the implementation date of January 1, 2022.

Revision:
5709.16 32.22 Aircraft/Aviation Dispatchers
All aircraft (except sUAS; refer to FSH 5709.16 36.62 for additional requirements for sUAS operations) shall be dispatched only by a qualified aircraft dispatcher or under the direct supervision of a qualified aircraft dispatcher. Aircraft dispatchers shall meet the training, currency, and qualification requirements defined in the Forest Service *Fire and Aviation Qualifications Guide* and the PMS 310-1 and complete the aircraft/aviation dispatcher courses in Interagency Aviation Training (IAT).

Forest Service aviation professionals believe dispatchers communicating with aircraft, flight following, providing dispatch information and other aviation centric information should meet the long-standing minimum training and qualifications in the 310-1, Forest Service Fire and Aviation Qualifications Guide and policy. To date, compliance with these requirements has not occurred in many locations.

In 2018, a briefing paper was submitted to the National Coordination Center Managers (NCCM) for discussion and input regarding the proposed policy revision. In response to the

briefing paper, did not support the removal of the Initial Attack Dispatch (IADP) from the agency requirements.

The discussion from 2018 lead the NCSC and NCCM groups to draft and propose revisions to the NWCG position qualification requirements for Initial Attack Dispatcher (IADP) and ACDP inclusive of additional required training. The intended outcome of these efforts was expected to mitigate concerns raised from the USFS Washington Office regarding the perceived lack of training for those positions. The revision was implemented in 2021.

Issues and questions with the policy revision:

The coordination system's revision of NWCG ACDP and IADP position qualifications requirements did not alter the USFS decision to implement their policy revision in FSH 5709.16 Ch32.22 – Aircraft/Aviation Dispatchers. With this new language, there are several questions from the interagency community for clarification on intent or direct impact to the interagency dispatching community.

- The use of the words "ONLY" and "OR" in the same sentence.
    - ONLY is specific and means only.
    - The word OR suggests that all language prior to that word "OR" is negated.
    - This has caused confusion.
- The phrase "Under direct supervision" has also raised questions. Is the intent that there must be a fully qualified ACDP on scene and physically present in the office at all times or is the direct supervision within the table of organization adequate?
- Dispatch centers hire individuals based upon position descriptions and not red card qualifications. A Center Managers minimal requirement is to have been qualified as a Support Dispatcher (EDSD), although currency is not required. There is no qualification requirement for any other dispatch positions (IADP, ACDP, etc).
- How does this policy effect those centers who are 100% teleworking?
- How does this policy support the fourth-tier dispatch centers? Those centers who only have a qualified IADP for the tracking of random aircraft through their airspace? With the new re-organization of the NWCG qualifications to reflect EDRC – IADP – ACDP, does this not mitigate some or all the concerns outlined in the 2018 document?
- Do the revisions of the NWCG position qualification requirements resolve the USFS concerns and negate the need for change in 5709.16 policy?
- Several of the mandatory IAT course were not available in 2021 and 2022 due to the COVID-19 pandemic. The dispatch community is working on the issue, but it may not be corrected until 2023/2024.
- How does this policy affect the interagency partners? Example: BLM IADP launching USFS resources?
- How does this policy support succession training for IADP to become a qualified ACDP without allowing for them to do the tasks of an IADP task book?
- What is the agency's definition of "dispatching"?
    - Per NWCG glossary, the word dispatching is the implementation of a command decision to move a resource or resources from one place to another, including but not limited to, tactical and logistical resources.
    - Within NWCG there are other positions that also do the task of moving and directing of resources, mostly in the aviation world. These positions take

command of the aircraft, their movement and tracking without impacting or coordination with an IADP or ACDP once operational control has been established. Example: ABRO or Helibase manager. Is the intent to reallocate these responsibilities back to the local center and ACDP?

- Per IFPM, the qualification ACDP is not required for Local Center Managers. The only NWCG required qualification is Expanded Dispatcher (EDSD). How does this policy impact centers which typically do not have aircraft stationed or positioned within their area and thus do not have ACDPs on the table of organization?

Proposal:

1. The NWCG Task Book for the Position of IADP includes tasks specific to ensuring compliance with all legal and safety requirements relevant to air operations including:

   ❖ *Plan and implement flight following procedures according to agency requirements*
   ❖ *Monitor aircraft operations for adherence to regulations and safety procedures.*
       a. *Federal Aviation Regulations*
       b. *Flight plans*
       c. *Duty limitations*
       d. *Flight manager briefings*
       e. *Startup/cut off times*
       f. *Safecoms*
       g. *Helicopter modules*
       h. *Ramp management*
   ❖ *Select appropriate and cost-effective aircraft for mission requirements.*
       a. *Capabilities/limitations*
       b. *Types*
       c. *Cost comparison*
       d. *Special use missions*
       e. *Medevac*
   ❖ *Identify hazards and deconflict airspace.*
       a. *Frequency management*

   b. *Airspace coordination*
   c. *Temporary Flight Restrictions (TFR)*
   d. *Special Use Airspace (SUA)*
   e. *Military Operating Area (MOA)*
   f. *Military Training Route (MTR)*
   g. *Pilot briefings*
   h. *Flight hazards*
   i. *Maps*
   j. *Aeronautical sectionals and military AP/1B*
   ❖ *Dispatch tactical aircraft.*
       a. *Airtankers/Single Engine Air Tankers*
       b. *Smokejumper aircraft*
       c. *Lead planes/ASM*
       d. *Air attack platforms*
       e. *Helicopters*
   ❖ *Mobilize aircraft for logistical missions.*
       a. *Point to point*
       b. *Special use*

   Qualified IADPs performance specific to these tasks have been evaluated and ultimately certified by their respective agency to perform them. NCSC and NCCMs recommend they are allowed to serve the wildland fire and all-risk community in this capacity

2. Establish an interagency committee involving NCSC and NIAC to evaluate best practices for the IAPD and ACDP positions for the dispatching of all aviation resources, considering the concerns from the 2018 paper and the reorganization and the training efforts conducted by the dispatching community.