

Resolution of the definition of "known icing conditions" is clearly a good idea. However, the proposal being made appears inconsistent. To quote from the proposal: "If the composite information indicates to a reasonable and prudent pilot that he or she will encounter visible moisture at freezing or near freezing temperatures and that ice will adhere to the aircraft along the proposed route and altitude of flight, then known icing conditions likely exist."

I am unable to reconcile the phrase "known icing conditions likely exist" with common sense. If the conditions are KNOWN then LIKELY is superfluous. If the conditions are only LIKELY then, by definition, they are not KNOWN.

To me, as an IR GA pilot of small, single-engined aircraft, I avoid icing conditions like the plague. However, it is not possible to fly such aircraft IFR on most days in winter without the POSSIBILITY of entering clouds at a temperature lower than 0degC / 32degF, for example if required by a clearance. Foolishly blundering into forecast icing conditions regardless of the consequences is stupid, but occasionally passing through thin stratus layers to follow a clearance is not. It seems counterproductive to equate the two and, by implication, accuse a "reasonable and prudent" pilot of violating an arbitrarily-defined regulation.

Surely "known icing" means just that: it is KNOWN. This implies a PIREP or other report.

The implication is that sensible pilots do all they can to avoid icing conditions. This includes reviewing all available information (forecasts and reports) pertaining to the flight before it is undertaken. If, despite these precautions, a trace of icing is encountered, continued flight in those conditions is prohibited (except to the extent that flight is necessary to escape the conditions, of course: one can't stop flying in mid-air). Such a brush with dangerous conditions will lead to concern on the part of the pilot, but should not lead to a violation of 14CFR.

Regards,

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