

## **CAP 797 Flight Information Service Officer Manual – Comment Response Document** **22 February 2012 – 18 May 2012**

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This document contains AATSD responses to all comments received in respect of the consultation on the proposed new CAP 797 Flight Information Service Officer Manual.

Comments were received from:

- 2 Private Individuals
- Northampton/Sywell Aerodrome
- Fleetlands Heliport
- Shobdon Aerodrome
- Wolverhampton Halfpenny Green
- HIAL
- City Airport (Manchester Barton)
- Wellesbourne Mountford Airfield
- Cotswold Airport (Kemble)
- NATS

The CAA thanks contributors for their comments and for the care and attention that they afforded to this consultation.

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
1	General	Aerodrome FIS – An AFISO effectively provides “ground control” to aircraft. But because the call-sign is “information” this may be misleading, particularly to foreign pilots. Therefore to minimise the chance of taxiway incursion, may I suggest that an AFISO provides ground movement information instead of control?	‘Information’ is the recognised ICAO call sign for a Flight Information Service and hence its use. In the UK however, AFISOs subject to certain conditions, issue instructions as opposed to information on the ground and therefore the term ‘ground movement information’ is not considered suitable, as it does not highlight the instructional nature of the transmission. The CAA intends to conduct an education program in conjunction with the publication of this manual which will detail service provision by Flight Information Service Officers.	Rejected
2	General	Area Control FIS – I am in full support of harmonising the role of FIS in Europe to reduce the risk of airspace infringements. This is documented in the Eurocontrol Action Plan AGY-R-04 and Ref 6.23. <a href="http://www.eurocontrol.int/safety/gallery/content/public/library/Airspace%20Infringement/Action%20plan/AI_ActionPlan_released.pdf">http://www.eurocontrol.int/safety/gallery/content/public/library/Airspace%20Infringement/Action%20plan/AI_ActionPlan_released.pdf</a> It would seem that in places like France, the FIS controllers have smaller sector/area coverage and can also co-ordinate/issue clearances through terminal approach airspace? Maybe they sit next to the approach controllers?	The role of Flight Information Service in reducing the risk of airspace infringements is acknowledged. However sector area and location of Flight Information Service Officers is considered to be outwith the scope of this document, and is a matter for local procedures.	Noted
3	Page 22	Abbreviation Mb no longer needed	Document amended to reflect hectopascal as the unit of atmospheric pressure.	Accepted
4	Page 31	As well as Police Flights, is it worth including Helimed as several aerodromes which are AFISU have these?	Text will be added to include Helicopter Emergency Medical Services (HEMS).	Accepted
5	Page 50/51	As mentioned by the GATCO rep (an ex ATCO and current FISO) the word clearance crops up several times and its use was questioned as it was inferred only an ATCO can pass a Clearance. Perhaps a definition of the word Clearance when used by a FISO needs to be mentioned or the word Instruction used? I have no problems with the word but there was some doubt about its legal use!	Reference to clearance when related to a Flight Information Service Officer, excepting relay of an air traffic control clearance, will be changed throughout the document to instruction or approval.	Accepted

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6	Page 56	Para 18.1 When read as a single paragraph this is ambiguous in that if a Pilot reads this he may think he can just report lining up or taking off when at the holding point instead of the "Ready for Departure" call. We have had several instances of this happening when instead of a "Ready for Departure" call aircraft actually start lining up and call "call sign lining up for departure."	<p>As a pilot requires taxi instructions on an aerodrome staffed with a Flight Information Service Officer, a limit to those instructions will have been issued, e.g. the holding point of the runway in use. Therefore it is inherent within those instructions that further communication must take place before the pilot moves beyond this point.</p> <p>The following text is now in a separate paragraph:</p> <p>Pilots shall inform AFIS units of their intentions, e.g. 'holding', 'lining up', 'taking-off'. 'Lining up' denotes the act of entering the runway for departure, whereas 'lined up' indicates that an aircraft is in position on the runway, aligned with the take-off direction.</p>	Accepted
7	Page 58	Para 22.1 Passing the surface wind to every arriving aircraft increases the RTF chatter, especially when busy during which the wind will be regularly passed to circuit traffic. Could it be made to be passed only if there is little circuit traffic and is thus not being broadcast as often?	Wind requirement will be removed from 18.3 (was 20.1) and 21.1 (was 22.1), i.e. when calling for taxi, and entering the Aerodrome Traffic Zone for landing.	Accepted
8	Page 59	Para 23.2 Waiting for a preceding aircraft to cross the upwind end of the active runway just does not work in the life of a GA airfield, especially when microlights are involved. A modicum of common sense prevails in these situations, yes indeed if a fast is following a slow, but not for similar speeds or slow following fast. If we followed that rule rigidly with traffic ranging from Beech 200 and Extra 300 to flexwing microlights I shudder to think how many go-arounds we would have!	<p>Text will be changed to:</p> <p>'A landing aircraft shall not be informed 'land at your discretion' until the runway is unoccupied'.</p>	Accepted
9	Page 63	Aerodrome/Runway Inspections. Is it worth mentioning that according to CAP 168 App 3F para 3 all hard surface rwy should be inspected at least twice a day?	This reference in CAP 168 does not state hard surface therefore CAP 797 will be amended at Section 2, Chapter 3, 1.2 to state: 'at least two surface inspections should be made daily ...'	Accepted

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10	Pages 76/82	The description of Helicopter Phraseology on page 76 does not agree with that in tabulated form on page 82 in terms of the word Hold. 4.2.7 states "Hold Position" means it may hold in the hover or on the ground, page 82 says it refers to holding whilst ground taxiing.	4.2.7 and page 82 re-worded to indicate two options, 'hold position' for a ground based manoeuvre and 'hold in the hover' for an airborne manoeuvre.	Accepted
11	Page 80	<p>Backtrack! Always a grey area during my time as a FISO. Two scenarios, xxxxx related;</p> <ol style="list-style-type: none"> <li>1. An aircraft has landed on rwy 03L and is speed controlled, traffic on finals is given discretion to touch and go on the parallel rwy 03R so I need to backtrack the aircraft on the hard... what am I allowed to say?</li> <li>2. As in the scenario mentioned above for Page 56 when the grass is unusable and we are using Rwy 21R, aircraft taxi to A1 for checks (The 03L end) When an aircraft at A1 calls ready for departure I would look like a complete idiot if I asked him if he required a Backtrack, of course he does! By saying "Report Lined up Rwy 21R" only gets a "confirm I am cleared to Backtrack?" As the Backtrack is effectively a taxi manoeuvre why can't we say "Backtrack, report lined up" if there is no traffic to affect? Of course this gets tricky if there is traffic to affect! "Traffic on base leg/downwind, backtrack at your discretion, report lined up" might work, or if there is finals traffic "Hold Position".</li> </ol>	<p>'Backtrack' is acceptable if it is a taxi instruction, e.g. at the end of a landing roll.</p> <p>If it forms part of the pilot entering the runway for departure, then it must not be misconstrued as a line up instruction.</p> <p>Therefore phraseology to be added to Section 4, Chapter 1:</p> <p>6.4 Taxi 'Backtrack runway ....'</p> <p>6.6 Take-off 'At your discretion Backtrack runway....., report lined up or lining up'</p> <p>By placing 'At your discretion' at the start of the transmission this should help to avoid a pilot misunderstanding the use of 'Backtrack' as an instruction.</p>	Accepted
12	Page 81	Paras 6.9 and 6.10 Why do we need the word "Roger" in 6.9 and not in 6.10? Surely not needed at all?	'Roger' removed.	Accepted
13	Foreword	Reference to "civil" FISO. All FISO's are civilian, there is no Military equivalent.	'Civil' removed.	Accepted
14	Glossary	There are several references in the document to "vicinity of the aerodrome" but what this means is not defined in the glossary.	It is subject to Flight Information Service Officer discretion and is based on what is considered reasonable. Certain elements can be defined in local procedures, such as emergency service response area, however when referencing traffic information or weather this will depend on what is reasonable depending on the traffic that is being provided with a service.	Noted

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15	Abbreviations, p22	“Mb Millibars” obsolete and not referenced elsewhere in the document.	Document amended to reflect hectopascal as the unit of atmospheric pressure.	Accepted
16	Ch1 Service Provision by FISOS, 3.2, p26	Guidance for inter-liaison between AFIS units and other ATSU's might be more appropriately placed in CAP 427. The establishment of LOA's and the writing of local procedures is a task undertaken by Aerodrome Authorities not individual FISOs.	Flight Information Service Officers need to be aware of what a Letter Of Agreement is and what it consists of.	Rejected
17	Ch4 Flight Rules, Flight Rules, 2.1 p34	Table of classification of airspace seems unnecessary; there is only the need to point out that IFR flight rules only are mandatory in class A airspace.	The table is shown to provide a more complete picture. If only Class A was shown it may reasonably be asked what happens in the other classes of airspace and why they are not shown.	Rejected
18	Ch4 9 Aircraft Proximity 9.3 p38	Explanation would be helpful of what “follow up action” the FISO should take.	Text will be added.	Accepted
19	Ch5 Airborne Collision Avoidance System 4 ATS Reporting 4.1 p41	ATS reporting is light on detail with no reference to which form to fill in or action the FISO should take where they believe there has been a breach of legislation.	New section introduced on Reporting Procedures.	Accepted
20	Ch6 Diversion Procedures 3.1 p42	Is it appropriate for an AFISO to request a pilot to divert due to “traffic reasons”?	Under certain circumstances yes, e.g. an aerodrome with a single runway which is blocked with a disabled aircraft with no prospect of the aircraft being moved and the runway coming back into service. The pilot always has the option to refuse the request.	Rejected
21	Ch6 4 Diversion of Military Aircraft p43	Is there no need to advise D&D of diversions of aircraft operated by the Army? Does this refer to all aircraft on the military register and does it include civilian registered aircraft being operated by the RAF / Navy. Also, does this include military registered aircraft operated by civilian contractors?	Text will be changed to reference Military Aircraft.	Accepted

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22	Ch7 Royal Flights 6.1 p45	Text states that details of a RLLC will be, “promulgated by NOTAM...” this is not correct. UK AIP ENR 4.3.2 states that details are promulgated by “notification message” Therefore AFISO units not on the AFTN or with access to Mil-EAMS will not have access to RLLC information.	‘Notification message’ covered in paragraph 4 - ‘by NOTAM’ will be deleted.	Accepted
23	Section 2 Ch1 Flight Information Service at Aerodromes 1.5 p47	CAP 410 Ch14 gives some details on what a unit’s local instruction should include, there is no guidance given in CAP 797. Perhaps this guidance would be best placed in a revised CAP 427?	Text added to Section 7 (Administration).	Accepted
24	Ch1 8 Taxi Clearance & 9 Clearance Limit p51	“Clearance Limit” is defined by ICAO as “The point to which an aircraft is granted an air traffic control clearance.” As such the use of the term “Taxi Clearance” and “Clearance Limit” may not be appropriate for AFISOs. “Taxi instructions” may be more appropriate as clearances are associated solely with an ATC service.	The word ‘clearance’ when referenced to a FISO replaced throughout the document with the word instruction or approval.	Accepted
25	Ch1 17 Order of priority for arriving and departing traffic. 17.3 p55	As “continue approach” and “go around” are not an option to an AFISO guidance on the correct phraseology we should use would be beneficial.	‘Land at your discretion’ and ‘Runway occupied’ provides the pilot with the necessary information regarding runway occupancy. Based on these transmissions and his range from touchdown a pilot will make a decision on continuing, landing or executing a go around.	Noted
26	Ch1 20 Aerodrome & Meteorological Information 20.1 & 20.2 p57	AFISO’s shall give OAT yet a thermometer is not part of the essential equipment list of an AFISO unit according to CAP 427.	Recent consultation conducted by the UK Meteorological Authority will introduce temperature measurement at Aerodrome Flight Information Service units. This will appear in CAP 746 Meteorological Observations at Aerodromes.	Noted
27	Ch1 20 Aerodrome & Meteorological Information 20.1 & 20.2 p57	CAP 410 part A Ch10 p1. has details on Met reports and special met reports which do not appear in CAP 797.	CAP 797 does not at this time contain a section on Meteorological Services, excepting imbedded text relating to requirements to pass information to pilots. This section will be incorporated in the next amendment of the document.	Noted

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28	Ch1 22 Information Related to Arriving Traffic 22.1 p58	Items d), e) and f) could be replaced with “essential aerodrome information” which is defined earlier in the document.	Expansion of the text avoids the need to cross refer.	Rejected
29	Section 3 Flight Information at Area Control Centres 1.2 p70	Here and elsewhere reference made to MATS Part 2. Should this be “Local Instructions” as used in CAP 427? MATS Part 2 is a document associated with an ATC unit.	This section relates to Area Flight Information Service Officers at the London Area Control Centre and Scottish Area Control Centre, whose procedures are detailed in their relevant Manual of Air Traffic Services Part 2 (MATS Part 2).	Rejected
30	Section 4 3 Phraseology regarding the Provision of Information 3.7 p75	Not relevant at AFISO aerodromes.	There is at least one Aerodrome Flight Information Service Unit that has movements of Heavy Category aircraft, i.e. Boeing 747, Airbus A340 etc, therefore the entry is considered relevant. Will be amended to highlight that ‘Heavy’ or ‘Super’ will be used by flight crew in their initial call. As an aside paragraph 3.8 and 3.9 will be added to highlight the use of the ‘Student’ prefix.	Rejected
31	4 Helicopter Phraseology for Taxiing 4.2.8 p76	Second sentence makes reference to “control instructions” and the next “controller” which is not compatible at an AFISO unit.	Paragraph will be removed.	Accepted
32	5. General 5.1 p77	Pilot’s response, examples given are not in accordance with CAP 413. The terms, “Looking out” and “Negative contact” do not appear in CAP 413, pilots response to traffic info should be, “callsign” or “callsign roger”, Chapter 2 Radiotelephony, 1.12 of CAP 413 refers.	There is intent to enter phraseology in CAP 413 regarding responses to traffic information. CAP 797 is therefore being future proofed in this respect.	Rejected
33	6.7 After take- off p80	AFISO’s may not issue instructions to airborne aircraft including instructions to contact/ freecall their en-route frequency.	They may if they are relaying on behalf of an air traffic control unit for whom they have issued a clearance and a contact/ freecall frequency.  Phraseology example has been moved into 6.5 ‘Relaying Clearance’.	Rejected

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34	6.10 Approach and elsewhere p81	“Your discretion” is used, should be “at your discretion”	‘At’ will be added.	Accepted
35	6.11 Information to aircraft p81	An example of phraseology to be used in the event of the presence of windshear would be beneficial.	Example will be added to Section 4.	Accepted
36	7 Phraseology for vehicles etc. p83	Examples are given of “taxi” and “proceed” but not of “tow” as shown in CAP 413, 2 AFIS Terminology, 2.3.2.	Example will be added to Section 4.	Accepted
37	Section 6 Ch3. 2.2.1d) p96	FISO’s are not permitted to issue instructions to aircraft in the air to change frequency.	Text has been changed to ‘request’.	Accepted
38	3.5.1.c) and f) p97	Use of the word “control” inappropriate for FISO service.	c) ‘under your control’ replaced with ‘in contact’ f) ‘control position’ replaced with ‘position’.	Accepted
39	Section 7 1 Opening Watch p101	CAP 427 Minimum levels of equipment states that there must be “clipboard / displays (NOTAMs). Should it not be mandatory for FISOs to check NOTAMs before opening watch in accordance with local instructions?	NOTAMs will be added.	Accepted
40	Section 8 2.8.3 p106	The correct fax number for non permanent NOTAM proposals is 020 8750 3775	Number will be changed.	Accepted
41	General	We feel that it would be beneficial if CAP 427 Flight Information Service and the FISO License were updated alongside CAP 410 because the two documents work in parallel. Many of the references in CAP 427 are to documents now superseded and the FISO syllabus is out of date.	CAP 427 will need to be updated as necessary to reflect CAP 797.	Noted
42	General	We also feel that it should be mandatory for FISO units to have a FISO training plan and means of ensuring FISO competency.	Training and recurrent competency will be added to CAP 797 in due course but not as part of the initial publication.	Noted
43	General	There is no mention of AFISO actions when in receipt of miscellaneous reports such as oil pollution.	New section introduced on Reporting Procedures (including terms).	Accepted
44	General	There is no explanation of terms for Aircraft Accident, Incident and AIRPROX reports.	New section introduced on Reporting Procedures (including terms).	Accepted

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45	General	CAP 410 part B Ch5 page 2 details, "Post Accident Checks" but this is missing in CAP 797.	An entry will be made in Section 2 (Aerodrome Flight Information Service).	Accepted
46	Section 2, Chapter 1 para 18.4	<p>Take off – "report lined up"                      Being able to line traffic up whilst the runway is occupied is a very useful phrase and will expedite departing traffic. However this may also have the effect of increasing radio calls because the aircraft will have to make the report "Lined up" followed by the FISOs response. If the runway is still occupied there will be even further RT.</p> <p>"Line up and wait" or "Line up and hold" would be much clearer and indicate that the aircraft may continue on to the runway and expect a further clearance when the runway is vacated. It also means the aircraft does not have to respond when lined up which reduces RT and FISO work load.</p> <p>There is still confusion amongst pilots as to when they are under instruction and when they are advisory. It would make absolute sense, and be easier to understand, if aircraft were under FISO instruction when the wheels are on the ground (hovering for rotary A/C) and are advisory when airborne or lined up on the runway ready for departure.</p> <p>(Further comment received)                      Comments to strengthen the argument for FISO control of aircraft on the active runway.</p> <p>There is confusion amongst the majority of general aviation pilots about the rules governing an AFIS. Pilots are unsure as to when they are under instruction and when actions are discretionary. The proposed change will be just as confusing since the holding point is still the point of changeover but the pilot will be receiving what will be perceived as an instruction onto the runway.</p>	<p>"Line up and wait" and "Line up and hold" are instructions to enter the runway and would therefore exceed the privileges of the Flight Information Service Officer licence, which only allows control on the ground for departures up to and including the holding point of the runway in use, or for arrivals after completion of the landing roll. The use of 'report lining up' or 'report lined up' is not an instruction but is a request for information from the pilot. From the traffic information that the FISO has provided, the pilot will make the decision whether or not to line up on the runway. The phraseology 'report lined up' originates from a request by industry to provide more expedition, whilst remaining within the privileges of the Flight Information Service Officer licence. It is envisaged that 'report lined up' in conjunction with traffic information would be used when the pilot reports ready for departure and a previously landed aircraft or crossing traffic does not permit a 'take off at your discretion'. As an example the term 'report lining up' could be used when a FISO has issued a 'take off at your discretion' but is unsure whether the pilot will enter the runway. At all times these transmissions will be accompanied by sufficient traffic information to allow a pilot to decide whether he can safely depart or whether he wishes to hold position. At present in the absence of 'Report lined up' a FISO has to wait for landing traffic to vacate before issuing a 'take off your discretion' as phrases such as 'line up' are not permitted. Therefore this is seen as an advantage to Flight Information Service Officers and pilots in providing flexibility and expedition and avoiding late departures in front of arriving aircraft.</p>	Rejected

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		<p>The proposed changes will enable a FISO to line an aircraft up on the active runway when it is occupied with vacating or crossing traffic by requesting the departing traffic to report lined up. If the runway is still occupied when the traffic reports lined up the FISO will have to respond with “runway occupied” and give traffic information. The pilot will then expect a further call from the FISO when the runway is vacated and will be expecting a “take off your discretion”. Under this situation the captain of the aircraft will, in all probability, assume he is under instruction when he enters the runway until he is ready departure and be expecting a further clearance.</p> <p>If this is the case I see no reason why FISOs should not be able to give instructions to aircraft up to the point of being ready departure on the runway.</p> <p>I understand that part of the CAAs concern is that AFIS instructions must conform to ICAO standards. ICAO standards confirm that the runway is part of the manoeuvring area and FISOs are responsible for issuing instructions to aircraft on it. Allowing FISOs to take aircraft onto the active runway to hold would therefore not conflict with ICAO standards and remove ambiguity about the changeover point.</p>	<p>Regarding confusion amongst the majority of general aviation pilots, it is the intention as part of the promulgation of this new CAP to carry out a communications and education programme to pilots, detailing service provision by FISOs.</p>	
47	Section 2, Chapter 1 para 20.1	<p>Prior to taxiing... An aircraft shall be advised of... Item b is surface wind direction and speed. This is not normal practice in light aviation. Surface wind is given when ready for departure.</p> <p>If the purpose of giving this information at that point is to inform the pilot so that he can decide if the conditions are outside his or the aircrafts operational limits then this will have been done in his initial preparation and flight planning. It would make more sense to report the surface wind at this point only if there were significant changes to the average within the last hour or so.</p>	<p>Wind requirement will be removed from 18.3 (was 20.1).</p>	<p>Accepted</p>

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48	Section 2, Chapter 1, paragraph 22.1	<p><b>22.1 Prior to entering... (b)</b> also states that the surface wind shall be passed to joining traffic prior to entering the circuit. Again this is not normal practice for GA aircraft. Surface wind is given after the aircraft reports final.</p> <p>In practice, when a captain suspects the conditions may be outside the operational limits, the captain will request the surface wind when downwind or prior to joining. Remember he will have flight planned and PPRd so he will have an idea of the prevailing wind conditions.</p>	Wind requirement will be removed from 21.1 (was 22.1).	Accepted
49	Section 2, Chapter 1, paragraph 22.1	22.1 (c) states that the QNH shall be given to arriving traffic. In the United Kingdom it is normal to give the QFE to joining GA traffic.	<p>The UK Aeronautical Information Publication at ENR 1.7 states:</p> <p><b>5.3 Approach and Landing</b></p> <p>5.3.1 When an aircraft is descended from a Flight Level to an Altitude preparatory to commencing approach for landing, ATC will pass the appropriate aerodrome QNH. On vacating the Flight Level, the pilot will change to the aerodrome QNH unless further Flight Level vacating reports have been requested by ATC, in which case, the aerodrome QNH will be set following the final Flight Level vacating report. <b>Thereafter, the pilot will continue to fly on the aerodrome QNH until established on final approach. When requested by the pilot or local procedures require, the appropriate QFE and aerodrome or threshold elevation shall also be given.</b></p>	Rejected
50	Section 2 Chapter 1 paragraph 23	<p>Arriving aircraft.... 23.2</p> <p>Waiting until a departing aircraft has passed the end of the runway in use before giving a “Land your discretion” may cause problems for units that have long or parallel runways. Perhaps “shall” could be changed to “should” or “until the departing aircraft has established a positive climb and could not land ahead on the departing runway”.</p>	<p>Text will be changed to:</p> <p>‘A landing aircraft shall not be informed ‘land at your discretion’ until the runway is unoccupied’.</p>	Accepted

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51	Section 5 paragraph 1.4	Application 1.4 states that the responsibility for initiating action rests with the ATSU last in contact. Surely for overdue Action this responsibility rests with the unit who was expecting to be contacted i.e in the case of VFR PPR traffic the destination airfield.	In the event that an aircraft whilst in contact with an Air Traffic Service unit cannot be contacted, the responsibility for action would lie with that unit. If it fails to arrive having not lost contact with any units en-route then the destination aerodrome would take the overdue action.	Rejected
52	Contents	Chapter numbering is wrong after chapter 4.	Numbering will be corrected.	Accepted
53	General	Royal flights: Not my place to say but surely the Duchess of Cambridge should be included.	Text will be changed to:  'A Royal Flight within UK airspace is defined as the movement of an aircraft specifically tasked to carry one or more members of The Royal Family afforded such status by the Head of Royal Travel, The Royal Household.'  to reflect a pending new entry in the UK AIP regarding Royal Flights.	Noted
54	Chapter 1 Section 1	CAP 797 Chapter 1 section 1 conflicts directly with the ICAO definition of FIS. ICAO states that.... FIS is a service provided for the purpose of supplying <u>advice</u> and information useful for the safe and efficient conduct of flight..... (see page 10. 3.1)  Whereas chapter 1. 1.1 says FISOs are not permitted to issue instructions or <u>advice</u> except for para 1.2; which relates to aircraft on the ground.  There is no distinction in the ICAO definition between aircraft on the ground or in the air. It is sometimes useful to offer advice to aircraft in flight, for example for traffic unsure of position the FISO may suggest the aircraft contacts London Centre on 121.50 for a position fix.	ICAO Annex 11 Air Traffic Services defines ' Flight Information Service' as:  A service provided for the purpose of giving advice and information useful for the safe and efficient conduct of flights.  Advice will be added to Section 1, 1.1 as advice can be given to a pilot receiving a Basic Service.	Accepted

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55	Page 51, paragraph 9.2	<p><i>“when a taxi clearance contains a taxi limit beyond a runway, it is to contain an explicit clearance to cross that runway”</i></p> <p>Taxiing to rwy 16 at xxxxx would require:                      taxi holding point B2 (plus circuit direction particularly for non-based traffic)                      runway 16                      cross rwy 04                      cross rwy 10                      QNH.</p> <p>Some students &amp; visitors struggle with the quantity of information currently passed. Safety can be achieved by limiting taxiing to hold short of a rwy when necessary, rather than including multiple number-groups in every case.</p>	<p>In order to mitigate against runway incursions, if a pilot is to cross runways en-route to or from the departure runway, explicit instructions to cross those runways need to be included. To do otherwise would introduce non-standard procedures at AFIS aerodromes compared to ATC aerodromes and introduce a risk of runway incursions.</p>	Rejected
56	Page 59, paragraph 23.2	<p><i>“A landing aircraft shall not normally be informed ‘land your discretion’ until the preceding departing aircraft has crossed the end of the runway-in-use, or has started a turn, or until all preceding landing aircraft have vacated the runway-in-use”.</i></p> <p>Many aircraft at this aerodrome are slow microlights and VLAs, with ground-speed around 50mph. After departure they can be over the runway for a considerable time and be at circuit height by the upwind end of the rwy.</p> <p>The FISO should be able to adopt a similar position to that set out in MATS 1 section 2 chapter 1 para 12.5 <i>“An aircraft shall not be permitted to begin take-off until the preceding departing aircraft is seen to be airborne or has reported ‘airborne’ by RTF and all preceding landing aircraft have vacated the runway in use.”</i></p>	<p>Text will be changed to:                      ‘A landing aircraft shall not be informed ‘land at your discretion’ until the runway is unoccupied’.</p>	Accepted

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57	Section 4, Chapter 1	Under Section 4, Chapter 1 <i>Phraseology and FIS Requirements for Communications</i> , Table 6.6. – ‘Take-off’ FISOs have two options with regards phraseologies on “Report Lining Up” and “Report Lined Up”. Xxxxx would suggest it prudent that an explanation of the subtle differences when using both these phraseologies should be detailed under Section 2, Chapter 1 <i>Flight Information at Aerodromes</i> , Paragraph 18 – ‘Take-off’ to clarify the position to FISOs.	Extra text added to highlight that “Report lining up” is the act of reporting entering the runway for departure, whereas “Report Lined Up” indicates the pilot has entered the runway and is lined up on the runway in the appropriate take-off direction.	Accepted
58	Section 6	It may be prudent to consider an additional paragraph under Section 6 <i>Emergencies, Communications Failure Contingencies</i> , Section 3 – ‘ATS Contingencies’ on details applicable to the Impact of Volcanic Ash on ATS with regards to ‘Establishment of Temporary Danger Areas (TDAs)’; ‘Associated Restrictions to FISO Ops’ and a new Table under Section 4, Chapter 1 <i>Phraseology and FIS Requirements for Communications</i> , on standard FISO Phraseologies to aircraft entering a TDA established due to the presence of Volcanic Ash.	This is an evolving area and it is not felt practicable to add this to the document. Units need to keep up to date with the latest developments in procedures related to volcanic ash, which will be promulgated by CAA Information Notice/Safety Notice/Aeronautical Information Circular.	Rejected
59	Section 6	It may be prudent to consider another additional paragraph under Section 6 <i>Emergencies, Communications Failure Contingencies</i> , Section 3 – ‘ATS Contingencies’ relating to the deployment and use by modern light aircraft of ‘Ballistic Recovery Systems’ with an additional table under Section 4, Chapter 1 <i>Phraseology and FIS Requirements for Communications</i> , on standard FISO phraseologies to/from aircraft with regards to emergency deployment of Ballistic Recovery Systems.	Text will be added to Section 6.	Accepted
60	General	As a general recommendation xxxxx would appreciate at least 16 weeks notice ahead of the publishing date of CAP 797 to permit xxxxx to fulfil our ‘in-house’ document control requirements for nine airport locations with FISO compliments.	The request is noted.	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
61	General	xxxxx conclude that the introduction of CAP 797 shall better support xxxxx's FISOs with regards to the regulatory requirements associated with UK – Flight Information Service provision and the CAP would be further enhanced by the inclusion of appropriate references with regards to recommendations 1 to 3 as stated within this letter.	CAA response detailed in items 57 – 59.	Noted
62	Page 22 Abbreviations	Abbreviation Mb (Millibars) no longer required	Document will be amended to reflect hectopascal as the unit of measurement of atmospheric pressure.	Accepted
63	Page 25, Paragraph 1.2	<p>Rule 40 of the ANO grants authority to the AFISO to pass instructions to vehicles, personnel and aircraft operating on the manoeuvring area. The ANO definition of the manoeuvring area includes the part of an aerodrome provided for the take-off and landing of aircraft (i.e the Runway). However, the privileges of an AFISO listed at P25, Para 1.2 limits this control to only up to and including the holding point of the runway to be used for departure, this is in conflict with the ANO definition and means that the CAP is overriding the ANO authority.</p> <p>This limitation has some shortcomings when applied to certain situations. For example;</p> <p>a) Where no parallel taxiway is available (either temporary or by design), an aircraft may be required to backtrack a runway prior to departure. This might involve entering the runway, backtracking and then vacating at the starting point for power checks and then re-entering the runway to depart. To keep the flow of traffic moving, it may be required to backtrack several aircraft at once by instruction.</p> <p>b) Where an aircraft is permitted to cross the holding point onto the runway, but then the AFISO needs to cross a helicopter (Category A), or emergency vehicle, the AFISO has no way of ensuring that the aircraft will hold and can only give information. Pilot's can often mis-understand the information provided by the AFISO and therefore any</p>	<p>Rule 40 does not reference 'operating' on the manoeuvring area but 'taxiing' on the manoeuvring area.</p> <p>Page 25, paragraph 1.2 in addition to up to and including the holding point includes in c) all other taxiing aircraft intending to move or moving on the apron and manoeuvring area including the crossing of runways. At all other times information must be passed.</p> <p>To allow instructions up to and including the runway for a departure would require the issue of a line up clearance which is outside the scope of the privileges of the Flight Information Service Officer licence.</p> <p>AFISOs may use 'Hold position' for a taxiing aircraft, including on a runway, however it may not be used for a departing aircraft which has passed the holding point and is entering or has entered the runway.</p>	Rejected

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
		<p>crossing helicopter or vehicle could be left in doubt as to the intentions of the aircraft. For simplicity and removal of all ambiguity (creating a safer situation), the FISO should be able to instruct the aircraft to hold position whilst on the runway prior to departure.</p> <p>We believe that the Responsibility of the FISO at P25, Para 1.2 (a) should be amended to read: “departing aircraft about to move or moving on the apron and manoeuvring area up to the point at which the aircraft will depart and the FISO issues the phrase ‘Take off at your discretion’”</p>		
64	Page 25 Paragraph 1.2 e)	<p>Helicopters often spend a lot of time in the hover under training, which may be at a defined point or within the bounds of a specified area on an airfield. A helicopter engaged in hover practice should be considered as under instruction. This paragraph should be amended to read: “to helicopters engaged in air taxiing on completion of landing, to helicopters engaged in hover practice, or to helicopters that have reached the hover prior to air taxiing”</p>	<p>This paragraph (1.2) enables Aerodrome Flight Information Service Officers to give instructions to taxiing aircraft and helicopters as per ANO Rule 40. If the helicopter is engaged in any other type of operation, e.g. hover practice not being conducted as part of a taxi manoeuvre then information is to be passed.</p>	Rejected
65	Page 26 Paragraph 3.4	<p>The meaning behind the restriction on tactical co-ordination is not clear. Does this preclude a FISO requesting a co-ordination with a controller for the entry of an aircraft into controlled airspace for example? If the meaning is solely in relation to the service being provided (ie a FISO cannot pre-ordinate an aircraft to receive a traffic service in advance), then this should be clarified.</p>	<p>Flight Information Service Officers are able to relay clearances on behalf of an air traffic control unit, however they are not able to enter into tactical co-ordination in respect of aircraft receiving a service, e.g. an agreement to send an aircraft in a particular direction to deconflict from another aircraft receiving a service from another Air Traffic Service Unit.</p> <p>Co-ordination is as defined in the Glossary of CAP 797.</p>	Noted
66	Page 32 Paragraph 3.1	<p>There is no mention of Air Ambulance flights which may operate using the same categories as Police Flights.</p>	<p>Text will be added to Section1 Chapter 3.</p>	Accepted
67	Page 37 Paragraph 9.1	<p>This is contrary to the information published by the UKAB who state that ‘Only a pilot or air traffic controller can report an Airprox.’ Therefore, for clarification, can a FISO file an Airprox?</p>	<p>CAP 382 Mandatory Occurrence Reporting Scheme, UK Aeronautical Information Publication, and the UK AIRPROX Board (UKAB) website will be updated to reflect that FISOs can file an AIRPROX.</p>	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
68	Page 56 Paragraph 18.1	Where it states 'Pilots should not take off if there are other aircraft on the runway'. Should this not be 'must'? There should also be reference to times when multiple aircraft may use the runway in formation for take-off.	As an example, the use of the word "should", would allow for a situation where an aircraft crosses the runway at the threshold, behind an aircraft which is taking-off away from it, from a point further along the runway. It would also allow for a formation take-off, e.g. the Red Arrows.	Rejected
69	Page 56 Paragraph 18.5	'multiple line ups are not permitted'. This is unworkable and should be removed. During busy periods, it is common practice for 2 or 3 aircraft to be 'permitted' to cross the holding point towards the runway as this helps with the expeditious flow of traffic, particularly where the distance from the holding point to the runway threshold may be significant. It is noted that the Manual of Air Traffic Services does permit this, and at an airfield with just Air/Ground or no radio this would also be the case, therefore there is no reason under AFIS that this should be in place. AFISOs should be discouraged from using the phrase 'Report lining/lined up in turn', instead this should be given using standard conditional phraseology ie 'After the departing Cessna 152 report lined up'	<p>When a pilot is given traffic information on a departing aircraft and a 'take-off at your discretion' there is the possibility for two aircraft to be on the runway at the same time and is at the discretion of the pilot.</p> <p>However when an AFISO uses the phraseology 'Report lined up' because there is traffic crossing or vacating the runway then only one aircraft may be issued with such a request, i.e. only one aircraft shall be on the runway awaiting the traffic to vacate. The phraseology cannot be used to a further aircraft thereby allowing more than one aircraft to hold on the runway awaiting departure. This is because of the possibility of the subsequent 'take-off at your discretion' transmission being issued to or taken by the wrong aircraft. Were this aircraft to be on the threshold and the other aircraft further along the runway at another intersection, but hidden from view because of the slope of the runway, a serious incident could occur.</p> <p>The use of 'After the departing' is a clearance and is outside the privileges of the Flight Information Service Officer Licence.</p>	Rejected

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
70	Page 56 Paragraph 18.6	The AFISO should have the ability to instruct the pilot to 'hold position' on the runway. This would ensure that the aircraft does not then decide to take-off whilst the obstruction on the runway remains. There is no reason why this could not be permitted as it is already allowed for within Rule 40 as stated previously.	<p>An AFISO can instruct an aircraft to 'Hold position' on the runway if it is using the runway to taxi on. However when the pilot enters the runway with the intention of departing, 'Hold position' cannot be used.</p> <p>Rule 40 does not reference 'operating' on the manoeuvring area but 'taxiing' on the manoeuvring area. Page 25, paragraph 1.2 in addition to up to and including the holding point includes in c) all other taxiing aircraft intending to move or moving on the apron and manoeuvring area including the crossing of runways. At all other times information must be passed.</p> <p>To allow instructions up to and including the runway for a departure would require the issue of a line up clearance which is outside the scope of the privileges of the Flight Information Service Officer licence.</p>	Rejected
71	Page 56 Paragraph 18.7	During busy periods when the RTF is congested it is often useful to be able to have an aircraft ready to line up after a landing aircraft and this is currently common practice and works extremely well. The AFISO should be able to issue a conditional request/instruction such as 'After the landing Cessna 172 report lining up', ensuring that the pilot read's back as he would with a conditional clearance.	The use of 'After ...' in this context is a clearance and outside the privileges of the FISO licence.	Rejected
72	Page 56 Paragraph 18.7	An additional statement should be included to the effect of 'When an aircraft reports ready for departure and it is clear that a suitable gap in landing traffic does not exist to accommodate the departure of the aircraft, the AFISO should instruct the pilot to hold position at a suitable holding point.	<p>Section 2 Chapter 1 paragraph 18.9 states:                      Aerodrome Flight Information Service Officers may use the phrase 'Hold Position' for traffic on the manoeuvring area and for departing aircraft up to and including the holding point of the runway in use. Furthermore Section 2 Chapter 1 19.9 states:                      'When an AFISO has informed an approaching pilot 'land at your discretion', he shall instruct pilots who subsequently report ready for departure from the same runway to hold position at a suitable holding point. 'Take off at your discretion' information will be transmitted when the traffic situation permits.'</p>	Accepted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
73	Page 59 Paragraph 23.1	What action shall an AFISO take in the event that an aircraft continues and lands whilst the runway is occupied. We have previously been advised that this would be classed as a Runway Incursion and is therefore reportable to the CAA.	<p>Rule 14 of the Rules of the Air states:</p> <p>14 (1) A flying machine, glider or airship shall take off and land in the direction indicated by the ground signals or, if no such signals are displayed, into the wind, unless good aviation practice demands otherwise.</p> <p><b>(2) Subject to paragraph (5), a flying machine or glider shall not land on a runway at an aerodrome if there are other aircraft on the runway.</b></p> <p>(3) If take-offs and landings are not confined to a runway:                      (a) when landing a flying machine or glider shall leave clear on its left any aircraft which has landed, is already landing or is about to take off;                      (b) a flying machine or glider which is about to turn shall turn to the left after the commander of the aircraft has satisfied himself that such action will not interfere with other traffic movements; and                      (c) a flying machine which is about to take off shall take up position and manoeuvre in such a way as to leave clear on its left any aircraft which has already taken off or is about to take off.</p> <p>(4) Subject to paragraph (5) a flying machine shall move clear of the landing area as soon as it is possible to do so after landing.</p> <p>(5) Paragraphs (2) and (4) shall not apply if the air traffic control unit at the aerodrome otherwise authorises the flying machine or glider.</p> <p>Therefore a Mandatory Occurrence Report would be appropriate in the circumstances highlighted.</p>	Accepted
74	Page 59 Paragraph 23.2	Clarify what 'not normally' means in this context.	'not normally' removed.	Accepted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
75	Page 59 Paragraph 23.2	Not being able to inform an aircraft 'land at your discretion' until the preceding departing aircraft has crossed the end of the runway in use is unworkable. In a busy GA environment, movements happen very fast and there are many occasions where in this circumstance, the landing aircraft would be crossing the landing threshold before the departing aircraft has crossed the far end. This is probably more so on longer runways, and with aircraft of differing speeds.	Text will be changed to:  'A landing aircraft shall not be informed 'land at your discretion' until the runway is unoccupied'.	Accepted
76	Page 59 Paragraph 23.2	<p>What is the definition of the phrase 'land at your discretion'? If a landing aircraft is not issued with this phrase (ie because of busy RTF), is the pilot still able to land without it (if runway is clear)? Whilst it is acknowledged that the phrase is not a 'clearance or instruction', it still permissive in its nature and therefore this needs clarification as to how it is applied and perceived by pilots.</p> <p>In the same regard, the phrase 'Take off at your discretion' also appears as a permission as aircraft should presumably not take-off until this has been issued by the AFISO. This should also be clarified.</p>	<p>CAA legal department advise the following:</p> <p>An express "land at your discretion" message is not needed. But there must be some communication on the basis of which the pilot is reasonably able to conclude that he may safely fly into the zone and land.</p> <p>Whilst not discussed with CAA Legal Department it would seem reasonable that in the case of take off the pilot should receive such a transmission as their taxi instructions will have included a limit beyond which they should not proceed without further communication.</p>	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
77	Page 59 Paragraph 23.2	What action should an AFISO take in the event that an aircraft continues approach whilst the runway is occupied. When 3 or 4 aircraft may be established in final, this can be a common occurrence. However in the event that an aircraft becomes number 2 and is close to the one ahead or the one still on the runway, can the AFISO re-advise 'Runway Occupied, report going around/report intentions', as this would not be an instruction, purely a request for information. An extension to this might be where the number 2 aircraft is clearly heading into an unsafe situation. In these circumstances, would it be acceptable for the AFISO to suggest to the aircraft (only for situations where safety may be compromised) eg 'G-CD, the Runway is occupied, suggest go-around'.	<p>The Flight Information Service Officer provides information to the pilot in the form of:</p> <p>'Land at your discretion' or 'Runway occupied'.</p> <p>Based on these transmissions the pilot decides if it is safe to land. The Flight Information Service Officer cannot instruct a pilot to 'go-around' as this is outside the privileges of their licence.</p> <p>However the 'Foreword' 1.2 to CAP 797 states:</p> <p>'However, nothing in this manual prevents FISOs from using their own discretion and initiative in response to unusual circumstances, which may not be covered by the procedures herein'.</p> <p>This allows for unusual occurrences and therefore if the AFISO felt there was a justified reason for the use of 'suggest you go-around' then this is the part of the manual under which such a decision would be made. However this is for use in exceptional circumstances and is not the normal.</p>	Noted
78	Page 74 Section 4	RTF - It is sometimes necessary to give a conditional instruction to aircraft or helicopter engaged in taxiing or air taxiing. Guidance and sample RTF should be included as a specific paragraph.	Section 4, Chapter 1, 6.4 gives details of conditional instructions when taxiing.	Noted
79	Page 74 Section 4	RTF - Would the following phraseology be permitted, given to a helicopter that is in the hover ready to depart from a specific point, where the departure heading will take the helicopter across a runway in use. (This is a common occurrence at xxxxx for Category A departures of Police and Air Ambulance helicopters where with busy RTF we wish to avoid unnecessary delay due to the nature of the flight) – "After the departing Cessna 152 cross Runway 27, depart at your discretion, surface wind xx/xxx"	The transmission as stated sounds like a conditional take-off clearance subject to the C152 and therefore would not be acceptable. If it were two separate transmissions, i.e. an instruction to cross the runway and then once it was crossing, appropriate traffic information followed by 'take off at your discretion', this would be acceptable.	Rejected

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
80	Page 74 Section 4	RTF – Can an AFISO make a request from a pilot. Eg perhaps an aircraft has declared an emergency and needs to cut in front of another to make a short approach, can the AFISO make a request to the other aircraft such as ‘G-CD, can you give way to the Cessna 152 on your right hand side’	Yes, under the provision given to FISOs in the Foreword, paragraph 1.2:  ‘However, nothing in this manual prevents FISOs from using their own discretion and initiative in response to unusual circumstances, which may not be covered by the procedures herein’.	Accepted
81	Page 74 Section 4 Paragraph 6.8	We believe that it is unnecessary for the AFISO to pass the surface wind to an aircraft that reports inbound to the airfield. To do so on every inbound call is not currently common practice and would only add to additional congestion on the RTF. The giving of surface wind for an inbound aircraft should only be necessary either on request, or where the wind conditions are such that large variations exist (eg gusty conditions) where the information will be desirable for the pilot.	Wind requirement will be removed from Section 4 Paragraph 6.8(‘Aircraft wishes to enter the ATZ for landing’).	Accepted
82	Page 102 Paragraph 7.1	We note that the Data Display section has been removed, however it might be advisable to give some guidance as to what is best practice.	Data display will be entered in Section 7 (Administration).	Accepted
83	Page 57, Section 20	Mention should be made stating that an AFISO should pre-fix any met observations (that are not by qualified met observers) with ‘unofficial observation’	Already referenced at page 67, 3.5.8 and 78, 5.4 (f).	Noted
84	General	Listening Squawk/ Radar feeds suggestion: For units close to CAS, a listening squawk unique to the airfield for local flying a/c listening on the published frequency. Radar feeds to FISO units, to assist with lost a/c, pending CAS infringements and general safety/efficiency. Increased use of Mode-S will be a useful tool to identify a/c around the FISO’s airfield.	These points are noted.	Noted
85	General	Control over Helicopters: No reference in the new CAP 797 regarding phraseology for runway crossing by helicopters, any changes? This should be included to make it a ‘complete’ document.	Runway crossing phraseology is covered in Section 4 paragraph 6.4.	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
86	General	<p>Report lining-up/ lined-up: More positive control can be achieved using, 'No reported traffic to affect lining-up' or 'traffic is a _ _ _ to vacate, no other reported traffic to affect lining up'. These phrases do not constitute a clearance, but work in practice. The tower can have a much better view of approaching traffic/circuit traffic than a pilot at the holding point, due trees/buildings near the holding point and blind spots in the cockpit etc. In practice, 'Report lining-up' does not always work, the response, 'can I line-up?' is often heard'.</p> <p>In the 1984 FISO Manual, '&lt;callsign&gt; line-up' was considered standard phraseology. Why cannot a licensed, competent FISO, with a better view and picture of the circuit traffic, be trusted in approving the lining up of a/c, but can clear a vehicle, aircraft or hovering helicopter to cross an active runway?</p>	<p>The Flight Information Service Officer licence does not permit 'control' when aircraft are ready for departure and about to enter the runway, information must be passed. Similarly 'line up' is an instruction to enter the runway which would be outside the scope of the Flight Information Service Officer licence. The use of 'Report lining up' or 'Report lined up' in conjunction with traffic information is a request for information from the pilot however and is therefore acceptable. Subject to that traffic information having been passed, if a pilot responds 'can I line up' the reply should be 'line up at your discretion'</p> <p>In conjunction with the information passed the pilot will decide if it is safe to enter the runway.</p>	Rejected
87	General	<p>Landing not permitted until departing a/c has passed the end of the runway: On a busy day, with a long runway, slow a/c departing and a strong headwind, an unnecessary and potentially dangerous go-around could result. Could this not be related to ATC and large commercial aircraft? To apply this to light aircraft movements would mean unacceptable delays, with no safety advantage.</p>	<p>Text will be changed to:</p> <p>'A landing aircraft shall not be informed 'land at your discretion' until the runway is unoccupied'.</p>	Accepted
88	Page 77, paragraph 5.2	<p>Met Report: Use of 'Unofficial report' dropped?</p>	<p>Covered under Section 4, Chapter 1, paragraph 5.4.</p>	Noted
89	Page 36, paragraph 6.3	<p>Flight Plans: This sentence does not make any sense, 'advised', by what means? Does this relate to airborne flight plans only?</p>	<p>If a Flight Information Service unit is attached to the AFTN or if the facility exists for a flight plan to be telephoned through from a Flight Briefing unit, a destination aerodrome will only be notified if the pilot has filed the complete route to that aerodrome.</p>	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
90	General	Multiple line-ups: If not permitted, at what point is an a/c permitted to line-up? Lining up in turn has been used without incident for many years, any deviation from this would considerably slow proceedings, with added cost to private pilots and with no safety benefit.	In relation to Section 2 Chapter 1 Paragraph 19.8 the text will be changed to:  'Only one departing aircraft should be holding on the runway awaiting a landed aircraft, or traffic crossing the runway, to vacate'.	Rejected
91	Page 51, paragraph 9.2	Crossing runways not in use (Page 51. Para 9.2): Suggests we have to include a crossing clearance of an intervening runway if it is in the route from parking to the active runway holding point. It has been long assumed that a clearance to a holding point will automatically include crossing of another runway unless there is any reason for the aircraft to hold at the intervening runway holding point.	In order to mitigate against runway incursions, if a pilot is to cross runways en-route to or from the departure runway, explicit instructions to cross those runways need to be included. To do otherwise would introduce non standard procedures at AFIS aerodromes compared to ATC aerodromes and introduce a risk of runway incursions.	Rejected
92	Page 103, paragraph 9.1	Recording of R/T: Suggests we have to have R/T recorders. Clarification required?	Section 7, 1.1, (e) indicates checking recording equipment where available as part of the opening watch checks. It is recommended that Flight Information Service units make use of RT recorders.	Noted
93	General	Arriving Aircraft: At the last FISO Association meeting at xxxxx, it was stated that an aircraft could not land until 'land at your discretion' was received. Nowhere is this said and on page 59 23.1, 'AFISOs shall provide relevant information on local traffic and aerodrome conditions to assist the pilot in deciding whether to land or go-around', AFISOs having no 'control' on the runway?! If it is intended to change this then I would suggest that it must be stated clearly, 'pilots may not land or take off without land/take off at your discretion' having been received.	CAA legal department advise the following:  An express "land at your discretion" message is not needed. But there must be some communication on the basis of which the pilot is reasonably able to conclude that he may safely fly into the zone and land.	Noted
94	Page 51, paragraph 9.2	Clearance to a holding point is simple and safe, whether it be to runway for departure or initial clearance point. Any complicated instructions in my experience are often misunderstood and could have safety implications.	It is agreed that instructions should be clear, uncomplicated and safe. This paragraph however allows flexibility in operation depending on the complexity of the aerodrome concerned.	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
95	Page 56, paragraph 18.5	Multiple line ups have, over time proved safe and expeditious. I do not recall any incidents or accidents associated with this practice? Delays associated with single line ups would often add significantly to the cost of a flight.	Text will be changed to:  'Only one departing aircraft should be holding on the runway awaiting a landed aircraft, or traffic crossing the runway, to vacate'.	Rejected
96	Page 58, paragraph 22.1	Rather than give all arriving aircraft surface wind etc which due to amount of traffic might be overlooked better to be aware and pass significant wind and weather where appropriate.	Wind requirement will be removed from 21.1 (was 22.1).	Accepted
97	Page 59, paragraph 23.1	At the recent FISO Association meeting at xxxxx It was stated that aircraft could not land without having received 'land at your discretion' This para clearly states that the 'AFISO shall provide relevant information on local traffic and aerodrome conditions, to ASSIST the pilot in deciding whether to land or go around' not necessarily that information on final ? If it is the intention that this is to be interpreted as 'no landing' then I think it needs to be clearly stated because it is certainly not understood by most pilots. Would this mean that the AFISO is controlling aircraft in the air and on the runway? It would also result in unnecessary 'go arounds' when the frequency is too busy to make or receive calls but quite safe to land.	CAA legal department advise the following:  An express "land at your discretion" message is not needed. But there must be some communication on the basis of which the pilot is reasonably able to conclude that he may safely fly into the zone and land.	Noted

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98	Page 59, paragraph 23.2	<p>The spacing suggested here would seem to be excessive and unnecessary, is this a reflection of ATC rules with larger more complicated aircraft in mind? Again such imposition would seriously affect the flow of traffic and increase the cost to pilots.</p> <p>What do you class as normal?</p> <p>Back tracking? A grey and contentious area. Could not this be regarded as a normal taxiing aircraft (despite the fact it is on the runway) and instructions allowed? Anything else causes confusion and misunderstanding.</p>	<p>Text will be changed to:</p> <p>‘A landing aircraft shall not be informed ‘land at your discretion’ until the runway is unoccupied’.</p> <p>Whilst the context in which ‘normal’ in this response is not mentioned, in general it attempts to allow flexibility where that may be necessary in a particular set of circumstances, where a more rigid ‘shall’ is not appropriate.</p> <p>‘Backtrack’ is acceptable if it is a taxi instruction, e.g. at the end of a landing roll.</p> <p>If it forms part of the pilot entering the runway for departure, then it must not be misconstrued as a line up instruction.</p> <p>Therefore phraseology to be added to Section 4, Chapter 1:</p> <p>6.4 Taxi ‘Backtrack runway....’</p> <p>6.6 ‘At your discretion Backtrack runway....., report (lined up or lining up)’ .</p> <p>By placing ‘At your discretion’ at the start of the transmission this should help to avoid a pilot misunderstanding the use of ‘Backtrack’ as an instruction.</p>	Noted
99	General	Finally runway crossing for Helicopters some guidance needed.	Runway crossing phraseology is covered in Section 4 paragraph 6.4.	Noted
100	Abbreviations	<p>ATAS – extra space at the start of the definition!</p> <p>Mb is still listed.</p> <p>RAF and RN are listed, AAC for Army Air Corps is not.</p>	<p>Extra space added.</p> <p>Document amended to reflect hectopascal as the unit of atmospheric pressure.</p> <p>AAC will be added to Glossary.</p>	<p>Accepted</p> <p>Accepted</p> <p>Accepted</p>

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
101	Section 1, Chapter 1, paragraph 1.1	<p>“...not permitted to issue instructions or advice” The “or advice” section of that statement goes against the text in The Forward 3 3.1 of CAP 797 &amp; ICAO’s definition of the FIS service. Also, a FISO issues instructions on the ground – so technically incorrect on that statement too!</p>	<p>ICAO Annex 11 Air Traffic Services defines ‘ Flight Information Service’ as:</p> <p>‘A service provided for the purpose of giving advice and information useful for the safe and efficient conduct of flights.’</p> <p>Advice will be added to Section 1, 1.1 as advice can be given to a pilot receiving a Basic Service.</p>	Accepted
102	Section 1, Chapter 1, paragraph 1.2	<p>In an ideal world, the ability to extend instructions to aircraft on to the active runway, up until the point take off run begins, would allow AFISOs to issue the instruction to back track, and also to „hold position“ in the interests of safety. Also, what constitutes the completion of the landing roll? From what point on landing is the AFISO allowed to issue instructions to the aircraft? The previous argument presented by the CAA was that the ANO would need to be changed to allow FISO’s to give permission to give instructions to an aircraft on the runway pre-departure. The ANO 2009 part 33 Interpretation 255(1) already ALLOWS this as it is not ATC only or referenced elsewhere to this limitation.</p> <p><i>“Section 1 Part 33 Page 10 ANO 2009 PART 33 Interpretation 255 (1) In this Order: ‘Manoeuvring area’ means the part of an aerodrome provided for the take-off and landing of aircraft and for the movement of aircraft on the surface, excluding the apron and any part of the aerodrome provided for the maintenance of aircraft;”</i> As such, it is CAP 797 that would need altering and therefore can increase the level of safety by allowing aircraft to line up and wait, keeping phraseology the same as elsewhere and is what a pilot expects to hear rather than introduce new wording to mean exactly the same and lead to confusion/ambiguity! Or is the aim for CAP 797 to impose restrictions which are not in the ANO? The shorter air time to transmit “line up and wait runway 26” compared to “report lined/lining up runway 26, runway occupied with a Cessna 172 to vacate at b1” is plain to see! It is not a case of FISO’s trying to become controllers,</p>	<p>Instructions to enter a runway for take-off are outside the privileges of the Flight Information Service Officer licence.</p> <p>Completion of the landing roll is when a pilot is at a safe speed after landing to receive taxi instructions.</p> <p>ANO Rule 40 references taxiing on the manoeuvring area as opposed to operating on the manoeuvring area.</p>	Rejected/Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
		but a case of common sense! Finally for this section. If an aircraft needs to enter the active runway to vacate at a different point (i.e. full length) to return to his hangar, there is no provision to control this even though the aircraft is not going to fly... The same applies to helicopters. 1.2 C allows control of crossing runways, but not when it is used as a method/route for taxiing.		
103	Section 1, Chapter 1, paragraph 2	The term vicinity is very vague and under ATSOCAS outside of the ATZ there is no requirement to pass specific traffic information, only as per the example in 2.3. 2.3 also states if a pilot is not in the vicinity of an aerodrome should not expect any traffic information. We need clarification of what the „vicinity“ is. Using ATSOCAS as the example we should be providing traffic information WITHIN the ATZ and a basic service outside the ATZ, or is there now an area in between referred to as the “vicinity”. In 2.1 I feel the term vicinity needs to be replaced or clarified as to its precise meaning, as there is no mention of this in the Glossary either.	It is subject to Flight Information Service Officer discretion and is based on what is considered reasonable. Certain elements can be defined in local procedures, such as emergency service response area, however when referencing traffic information or weather this will depend on what is reasonable depending on the traffic that is being provided with a service.	Rejected
104	Section 1, Chapter 1, paragraph 3.2.1	Arriving traffic Addition of “runway in use” as well as QNH and possibly unofficial weather when conditions dictate.	Runway in use added.  QNH already listed.  Unofficial weather can be passed to the pilot on contact with the Aerodrome Flight Information Service unit.	Accepted  Noted  Rejected
105	Section 2, Chapter 1, paragraph 3	No mention of Air Ambulance flights even though they fly to the same categories as Police flights!	Text will be added to Section1 Chapter 3.	Accepted
106	Section 2, Chapter 1, paragraph 4.1	“Before moving on the apron and manoeuvring area... permission from the AFISO...” by the definition in the glossary, which in turn comes from the ANO, this includes the active runway. No mention of „only up to the runway hold for departing aircraft”.	If this comment relates to ANO Rule 40, this rule references taxiing aircraft which the Flight Information Service Officer can pass instructions to, e.g. crossing a runway.	Rejected
107	Section 2, Chapter 1, paragraph 4.2	Again by definition this includes the active runway.	If this comment relates to ANO Rule 40, this rule references taxiing aircraft which the Flight Information Service Officer can pass instructions to, e.g. crossing a runway.	Rejected

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
108	Section 2, Chapter 1, paragraph 4.4	This section is irrelevant as FISO units are not permitted to operate a second frequency for ground etc., what is the relevance, apart from full ATC?	4.4. deleted.	Accepted
109	Section 2, Chapter 1, paragraph 4.5	Can easily be changed to include lined up on the runway as per argument ref the ANO above!	Information only and not instructions to be issued to an aircraft lined up for departure. ANO Rule 40 references taxiing aircraft.	Rejected
110	Section 2, Chapter 1, paragraph 8.2	When it is necessary to use the active runway for taxi, the AFISO would not be able to issue instructions to the taxiing aircraft until the runway is vacated again (assuming they are departing). In the interests of safety instructions such as 'Hold Position' should be permitted.	<p>If the aircraft is taxiing, and after entering the runway as part of their taxi route will vacate the runway again, then as part of issuing taxi instructions on the manoeuvring area which includes the runway, the Flight Information Service Officer may use 'Hold position'. This is facilitated by ANO Rule 40. 'Hold position' however is not for use in situations where the aircraft has lined up with the intention of departing, except in exceptional circumstances as afforded by CAP 797 'Foreword 1.2:</p> <p>'However, nothing in this manual prevents FISOs from using their own discretion and initiative in response to unusual circumstances, which may not be covered by the procedures herein'</p>	Noted
111	Section 2, Chapter 1, paragraph 9.1	UKAB state 'Only a pilot or Air Traffic Controller can report an Airprox' has this changed?	CAP 382 Mandatory Occurrence Reporting Scheme, UK Aeronautical Information Publication, and the UK AIRPROX Board (UKAB) website will be updated to reflect that FISOs can file an AIRPROX.	Noted
112	Section 2, Chapter 1, paragraph 18	No reference to only issuing "take off at your discretion" if there are no other vehicles/aircraft on the runway.	The ANO does not inhibit two aircraft taking-off in turn, however text is being developed for CAP 797 to inhibit the use of 'take-off at your discretion' on those occasions when the use of this phraseology is inappropriate.	Noted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
113	Section 2, Chapter 1, paragraph 18.5	<p>The ability to line more than one aircraft up at a time would severely limit the AFISOs ability to perform his duty in the safe and expeditious movement of aircraft. Removing the ability to backtrack/line up an aircraft behind one departing from an intermediate point on the runway on both large and small units will create delays which will put pilots off from visiting the airfield concerned. This is obviously only performed when traffic levels permit i.e. no other traffic on downwind/base leg, but the duty FISO has the ability to determine if he has a gap to safely do so!</p> <p>There is also no provision for formation departures. It would be impractical to instruct the Red Arrows to take off individually!</p>	<p>In the scenario described a positive instruction to enter the runway and follow the preceding aircraft would be required. If the aircraft is taxiing and will subsequently vacate the runway again, for example into a holding point at the threshold this would be acceptable. However if they are to remain on the runway for departure this would exceed the privileges of the FISO licence as it would constitute a line up instruction.</p> <p>Section 2, Chapter 1 states:</p> <p>19.6 Pilots should not take off if there are other aircraft on the runway.</p> <p>In the last sentence 'Should' means that it is strongly advisable that an instruction is carried out; it is recommended or discretionary. It is applied where the more positive 'shall' is unreasonable but nevertheless a pilot/FISO would have to have a good reason for not doing so.</p> <p>Therefore the use of 'should' in this instance would allow for a formation take off by the Red Arrows.</p>	Rejected
114	Section 2, Chapter 1 paragraph 20	<p>Requirement to pass full met. Information on first contact would be impractical on a busy frequency. Surface wind is not passed at most units that I am aware of as a standard call due to it being passed to traffic on final, and on a busy day, it adds in extra r/t occupancy which is un-necessary. Since the AUKFISO meeting at xxxxx, where this was discussed, I have listened in to numerous other Air traffic units, and none pass the wind on the initial call! Runway in use, circuit direction and QFE/QNH along with relevant traffic information appears to be the norm universally!</p>	<p>Wind requirement will be removed from 18.3 (was 20.1) and 21.1 (was 22.1).</p>	Accepted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
115	Section 2, Chapter 1, paragraph 23	<p>If we employ the “land at your discretion” when the preceding aircraft has crossed the end of the runway at use, we would never land anything on a busy day! Our runway is 2009m long and giving runway occupied and causing aircraft to go around as an aircraft is climbing out 2km away is not practical, and will generate a lot of extra work willing out un If adopted, we would have a lot of pilots landing without a “land at your discretion” and the MOR system will become swamped. A microlight taking off from the threshold can easily be 300ft+ passing the tower at the mid-point and 600ft by the upwind end of the runway, saying to an aircraft on final, “runway occupied microlight climbing away not passed the upwind end of the runway” will not be generally accepted! By removing this statement completely and leaving it to the pilot to decide once told “traffic climbing away, land at your discretion” what he does is a much better option.</p> <p>In some instances it appears we are trying to adopt full air traffic procedures, but when logical ones present themselves we are being told we are only an AFISO service...</p>	<p>Text will be changed to:</p> <p>‘A landing aircraft shall not be informed ‘land at your discretion’ until the runway is unoccupied’.</p>	Accepted

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
116	Section 2, Chapter 1, paragraph 23.2	If an aircraft decides to continue his approach when he has been told the runway is occupied, what phraseology should be used to stop an infringement of air law, or we to allow the aircraft to land, keep fingers crossed an incident does not occur, and then file MOR"s? Surely "G-** runway remains occupied, report down wind" or similar would be a better/safer option.	<p>'Land at your discretion' and 'Runway occupied' provides the necessary information for the pilot to decide if it is safe to land. Based on these transmissions and their range from touchdown, pilots will make a decision on continuing, landing or executing a go around. If a FISO considers that a pilot having been passed a 'runway occupied' is continuing into an unsafe situation, they can re-iterate 'runway occupied' to alert the pilot.</p> <p>The FISO may if appropriate also make use of the statement in the 'Foreword', paragraph 1.2 which states:</p> <p>'However, nothing in this manual prevents FISOs from using their own discretion and initiative in response to unusual circumstances, which may not be covered by the procedures herein'</p> <p>However this provision is for use in unusual circumstances and is not for routine use.</p> <p>It must also be borne in mind that a pilot is flying an approach in line with the runway and therefore may have a better view than a FISO does of when the preceding traffic has vacated the runway.</p>	Noted
117	Section 2, Chapter 2, paragraph 3.3	As per CAP 168, Low intensity lighting is ONLY permitted to be displayed as part of a class L4 or L3 lighting system at Night and cannot be displayed during the day! <i>Reference "CAP168 Chapter 6 page 2, Aeronautical Ground Lighting - Minimum Licensing Requirements Table 6.1 the LI (omin) edge, threshold, end lights are listed as night use only"</i> , this paragraph should be removed.	CAA Aerodrome Standards advise low intensity lighting is of no value by day. Text will be removed.	Accepted
118	Section 2, Chapter 2, paragraph 3.4	Hazard beacons should be displayed by vehicles at ALL times on the manoeuvring area, and should be removed from this paragraph.	This section relates to the display of aerodrome lights as opposed to vehicle lights.	Rejected

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119	Section 2, Chapter 3, paragraph 1.2	CAP 168 states 2 surface inspections are required daily.	CAP 797 will be amended at Section 2, Chapter 3, 1.2 to state: 'at least two surface inspections should be made daily ...'	Accepted
120	Section 2, Chapter 4, paragraph 6.9	<p>"Number (in sequence) – as AFISOs are not permitted to assign a landing order, this could sound too similar to the counterpart landing order R/T used in ATC and lead to confusion amongst pilots.</p> <p>I would also like to see some clarification over conditional instructions i.e. "After the landing..." Allowed or not?</p>	<p>'Number (in sequence)' will be changed to (Traffic Information)</p> <p>The CAA view is that if conditional clearances are required for expedition then the aerodrome should review the level of air traffic service provided.</p>	<p>Accepted</p> <p>Noted</p>
121	Section 4, Chapter 1, paragraph 3.3	The call sign of the unit is dictated by DAP not the FIS unit. We are xxxxx, but our call sign is yyyyy. This statement is incorrect and should be removed.	<p>ICAO Document 9432 Manual of Radiotelephony states:</p> <p>2.7 CALL SIGNS                  2.7.1 Call signs for aeronautical stations                  2.7.1.1 Aeronautical stations are identified by the name of the location followed by a suffix. The suffix indicates the type of unit or service provided.</p> <p><i>Unit or service Call sign suffix</i>                  Area control centre CONTROL                  Radar (in general) RADAR                  Approach control APPROACH                  Approach control radar arrivals ARRIVAL                  Approach control radar departures DEPARTURE                  Aerodrome control TOWER                  Surface movement control GROUND                  Clearance delivery DELIVERY                  Precision approach radar PRECISION                  Direction-finding station HOMER  <b>Flight information service INFORMATION</b>                  Apron control APRON                  Company dispatch DISPATCH                  Aeronautical station RADIO</p> <p>UK AIP lists airfield data for xxxxx Airport under xxxxx.</p>	Rejected

No.	Ref.	Comment	CAA Response	Comment Accepted/ Rejected/Noted
122	Section 6, Chapter 1, paragraph 6.10	The phraseology for “low approach and go around” or “stop go” would be useful to have added.	‘Low approach and go around at your discretion’ will be added  ‘Stop go’ is not currently published phraseology but will be considered via the Phraseology Working Group for future inclusion in CAP 413 (Radiotelephony Manual) and CAP 797.	Accepted  Noted
123	Section 7, paragraph 6	We have been requested by the Met office to maintain a record of weather conditions both at the start of the watch and as conditions change through the watch period in the watch log. There is no mention of weather records at all in Section 7.  There is also no mention of passing met. reports as ‘unofficial observations’	The first edition of CAP 797 will contain procedures and phraseology with later sections being added to cover such items as meteorological services, training and competency.  Phraseology in Section 4 references passing unofficial observations.	Noted  Noted
124	Page 26 paragraph 2.4	It is common practise to give instructions to a pilot to report a position (e.g. 30 miles north of POL) to facilitate transfer of communications to another FIS unit. Do you consider this to be an agreement as described in the first paragraph of 2.4 “ <i>FISO shall not enter into agreements....</i> ”?	Asking a pilot to report a position which is part of the pilots routing is a request for information and not an agreement. An example of an agreement would be requesting a pilot to fly a particular route to deconflict his flight from another, which would be outside the privileges of the Flight Information Service Officer licence.	Noted
125	Page 71 paragraph 2.2	Suggest should read –“FISOs cannot issue clearances to alter course, climb or descend unless relaying a clearance <i>and/or instruction</i> on behalf of an air traffic control unit and a correct readback is received; and”....	Text will be changed.	Accepted
126	Annex D pages 117/118	Handley-Page Herald – delete as we do not believe these are in operation. Should read – Bae 125/Hawker 800/900/1000. Should read - Cessna 310, Should read - Aerospatiale Puma	Document will be amended.	Accepted