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Comment Response Tool

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	Requirements for ATM/ANS providers and the safety oversight thereof (Acceptable Means of Compliance (AMC) & Guidance Material (GM))
NPA Number	NPA 2013-08 (C)

UK CAA (European.Affairs@caa.co.uk) has placed 21 unique comments on this NPA:

Cmt	Segment description	Pag	Comment	Attachme
403	(General Comments)	0	Page No: N/A	
			Paragraph No: General	
			Comment: The AMC/GM material only covers Basic/Qualification Training. UK CAA believes this leaves out the most important aspects of training and competence aimed at actual tasks in an operational environment. The Provider should be left to determine training/competence requirements. The material only covers 'academic/theoretical' aspects which should not be the main thrust of the requirements.	
			Proposed Text: . Provide GM material only. Strengthen concepts of task oriented definition of training and competence requirements derived by Provider rather than academic/theoretical training requirements.	
404	(General Comments)	0	Page No: N/A	
	,		Paragraph No: AMC/GM to ATSEP ANNEX II - General	
			Comment: It is difficult to determine why some material is AMC and some GM. The whole thrust of this material seems to be aimed at subjects/theoretical topics. It should be aimed at tasks and objectives for the particular ATSEP post and what training/competence is needed to achieve these.	
			The Provider should define these tasks and objectives, starting with the particular job description. The GM material could then be used by the Provider as guidance to define training/competence arrangements etc.	
			Justification: There is no clear definition of what constitutes AMC or GM status.	
			Proposed Text: Move AMC/GM to Annex XII to GM status to provide maximum flexibility to each ATM/ANS Provider to determine training/competence requirements.	
405	AMC/GM to ANNEX I —	12	Page No: 12	
	Requirements		Paragraph No: GM1 ATM/ANS.AR.C.020 (b) (2)	

	for competent authorities in ATM/ANS (Part-TM/ANS.AR) — SUBPART C — OVERSIGHT, CERTIFICATION AND ENFORCEMENT (ATM/ANS.AR.C — GM1 ATM/ANS.AR.C Changes to ATM/ANS providers		Comment: This paragraph requires the competent authority to acknowledge the receipt of the notification of an amendment to the ATM/ANS provider's management system within 10 working days for those amendments that do not require approval. This has the potential for confusion as it would be normal to acknowledge receipt of all communications from the ATM/ANS provider. Where no approval is required the Competent Authority should make a 'positive' and clear statement to the ATM/ANS provider that they have 'No Objection' to the amendment being implemented in accordance with their approved procedures. Justification: Simply acknowledging the receipt of the amendment could lead to amendments that require approval being implemented before approval is received. Proposed Text: 'Where the amendment does not require prior approval the Competent Authority should acknowledge receipt of the notification in writing within 10 working will inform the ATM/ANS provider, within 10 working days that they have 'No Objection' to the amendment being implemented in accordance with the ATM/ANS providers approved management system process.'	
406	AMC/GM to ANNEX II — General organisation	14 - 17	Page No: 15 Paragraph No: Figure 1	
407	common requirements for the provision of ATM/ANS (Part- ATM/ANS.OR) — SUBPART A — GENERAL COMMON REQUIREMENT (ATM/ANS.OR — GM1 ATM/ANS.OR.A Scope		Comment: This figure illustrates the scope of ATM/ANS. The ATSEP Annex XII indicates an ATSEP scope related to ATM/ANS and also implies a scope related to ATM and CNS. The scope of ATSEP is aligned to safety related systems, the term 'safety related' itself is not defined in the NPA material. It may be difficult for ATSEP scope to be clearly determined in practice therefore, it is not understood how Providers other than ATS can determine the safety related status of systems. Justification: To determine scope of ATSEP clearly. Proposed Text: Clarification of ATSEP scope.	
407	AMC/GM to ANNEX II — General organisation common	18 - 19	Page No: 19 Paragraph No: AMC1 ATM/ANS.OR.A.035 (b), subparagraph (b) (1)	
	requirements for the provision of ATM/ANS		Comment: The term 'application' is used here in relation to the notification of changes. The ATM/ANS provider is not 'applying' to make a change. They are 'notifying' a pending	

— GENERAL COMMON REQUIREMENT (ATM/ANS.OR.. — AMC1 ATM/ANS.OR.A (b) Changes **Justification:** Application implies that an 'Application form' would be required as in other cases where the term 'application' is used.

Proposed Text: '(1) ATM/ANS providers are to 'notify' the Competent Authority before any such change is made in order to enable the competent authority to determine continued compliance with Regulation (EC) No 216/2008 and its Implementing Rules and also to amend, if necessary, the certificate and related conditions attached to it.'

409

AMC/GM to ANNEX II — General organisation common requirements for the provision of ATM/ANS (Part-ATM/ANS.OR) — SUBPART B

MANAGEMENT (ATM/ANS.OR. — AMC1 ATM/ANS.OR.B Management system 21 **Page No**: 21

Paragraph No: AMC1 ATM/ANS.OR.B.015 Management System

Comment: The term 'should' is used twice in this paragraph which is an indefinite term and could lead to confusion as to the duty of the competent authority to oversee the operation and scope of an EN ISO 9001 certified management system, which includes the safety management system and security management system.

Justification: In effect ATM/ANS providers are being required to maintain and operate an integrated management system combining quality management, safety management and security management.

The ISO 9001 standard 4.1 general requirements require the following:

The organization shall establish, document, implement and maintain a quality management system and continually improve its effectiveness in accordance with the requirements of this International Standard.

The organization shall

- a) identify the processes needed for the quality management system and their application throughout the organization (see 1.2),
- b) determine the sequence and interaction of these processes,
- c) determine criteria and methods needed to ensure that both the operation and control of these processes are effective,
- d) ensure the availability of resources and information necessary to support the operation and monitoring of these processes,
- e) monitor, measure and analyse these processes, and f) implement actions necessary to achieve planned results and continual improvement of these processes. These processes shall be managed by the organization in accordance with the requirements of this International Standard.

As there is no specific EN ISO standard for safety/security management systems, items a) to f) above must include the processes for safety/security management, their

sequence and interaction, the criteria and methods for operation and control of safety/security, the resources and information necessary to support the operation, monitoring and measuring of these safety/security processes, the audit, review and continual improvement of the safety/security management system.

It is therefore essential that the Competent Authority has complete access to the ATM/ATS provider's quality management system regardless of whether or not they are in possession of an ISO 9001 certificate.

The ISO certificate is merely stating that the organisation is correctly applying its processes and procedures in accordance with the standard; it is not guaranteeing that the content of the process and procedures are compliant with requirements for ATM/ATS provision, especially in relation to safety/security management, operational control and technical support.

Proposed Text:

An EN ISO 9001 certificate, issued by an appropriately accredited organisation, addressing all the elements required in this Subpart **may** be considered as a sufficient means of compliance for air navigation service providers. In this case, The air navigation service provider **shall** accept the disclosure of the documentation related to the certification to the competent authority upon the latter's request.

410 AMC/GM to
ANNEX III —
Specific
requirements
for the
provision of
air traffic
services
(Part-ATS) —
SUBPART A —
ADDITIONAL
ORGANISATIO

REQUIREMENT

FOR THE

OF AIR TRAFFIC

PROVISION

SERVICES

(ATS.OR)

Section 2 — Safety of

services — GM1

ATS.OR.205 (d)(2)(3)(4) Safety management system 41

Page No: 42

42 | Paragraph No: GM1 ATS.OR.205(d)(2)(3)(4)

Comment: Paragraph (c) states:

'(c) The safety training programme may consist of selfinstruction via a media (newsletters, flight safety magazines), class-room training, e-learning or similar training provided by training organisations.'

This allows the ATS Provider to utilise self instruction via a media as the only means of training as an option. This is unlikely to be sufficient for SMS training.

Justification: Self instruction via a media is a method which should be used as part training within a training programme and not as a 'stand alone' as it is not a comprehensive training method.

417 AMC/GM to ANNEX III — Specific requirements 3 Page No: 43

Paragraph No: AMC1 ATS.OR.315(a), sub-paragraph (b)

for the provision of air traffic services (Part-ATS) — SUBPART A -ADDITIONAL ORGANISATIO REQUIREMENT FOR THE PROVISION OF AIR **TRAFFIC SERVICES** (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services -AMC1 ATS.OR.315 Responsibilities of providers of ATC services with regard to problematic use of psychoactive substances by **ATCOs**

Comment: UK CAA suggests a boundary to the amount of support provided should be included.

Justification: As written there is no limit to the level of support provided.

Proposed Text:

'(b) provide **an appropriate level of** support for ATCOs who are dependent on psychoactive substances; '

419 AMC/GM to ANNEX III — Specific

requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL **ORGANISATIO** REQUIREMENT FOR THE PROVISION OF AIR **TRAFFIC SERVICES** (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services -

AMC1 ATS.OR.315

(a)

3 | **Page No**: 43

Paragraph No: AMC1 ATS.OR.315(a), sub-paragraphs (b) and (c)

Comment: Many ATM/ANS providers do not have the facilities to provide medical, physiological or psychological 'support'.

Justification: Providers of ATC Services should enable **access** to such 'services' by their staff but should not be responsible for **providing** them

Proposed Text:

- '(b) provide support-facilitate access to rehabilitation for ATCOs who are dependent on psychoactive substances
- (c) encourage ATCOs who think they may have such a problem to seek and accept help from their ATC provider's services. '

		Responsibilities			
		of providers			
		of ATC			
		services with			
		regard to			
		problematic			
		use of			
		psychoactive			
		substances by			
L		ATCOs			
.	420	AMC/GM to	43	Page No: 43	
		ANNEX III —		, s	
		Specific		Paragraph No: AMC1 ATS.OR.315(a)	
		requirements		aragraph ito: Amor Ara.ok.ora(a)	
		for the			
		provision of		Comment: UK CAA believes that thresholds should be	
		air traffic		agreed across Europe.	
		services			
		(Part-ATS) —		Justification: To ensure consistency of application.	
		SUBPART A —			
		ADDITIONAL		Proposed Text:	
		ORGANISATIO		'(e) apply appropriate thresholds for psychoactive	
		REQUIREMENT			
		FOR THE		substances agreed with the relevant Competent	
		PROVISION		Authority.'	
		OF AIR			
		TRAFFIC			
		SERVICES			
		(ATS.OR)			
		Section 3 —			
		Human			
		factors:			
		principles for			
		the provision			
		of air traffic			
		control (ATC)			
		services —			
		AMC1			
		ATS.OR.315			
		(a)			
		Responsibilities			
		of providers			
		of ATC			
		services with			
		regard to			
		problematic			
		use of			
		psychoactive			
		substances by ATCOs			
-					
1	422	AMC/GM to	44	Page No: 44	
		ANNEX III —	-		
		Specific	49	Paragraph No: GM1 ATS.OR.320	
		requirements			
		for the		Comment: The large amount of guidance provided is	
		provision of		highly technical and falls under the remit of Health and	
		air traffic		Safety and is not considered Human Factors.	
		services		Salety and is not considered muman factors.	
		(Part-ATS) —			
		SUBPART A —		UK CAA suggests this guidance should be simplified or	
		ADDITIONAL		removed as responsibility for assessing and managing	
		ORGANISATIO		stress is covered under procedures for the Health and	
		REQUIREMENT		Safety of personnel and are covered in alternative	
		FOR THE		European legislation i.e. <u>Directive 89/391/EEC on</u>	
		PROVISION		measures to improve safety and health at work	
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1					

423	OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services — GM1 ATS.OR.320 Stress AMC/GM to ANNEX III — Specific	44 - 49	Page No: 48	
	requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services — GM1 ATS.OR.320 Stress		Paragraph No: GM1 ATS.OR.320, sub-paragraphs (k) (1) and (7) Comment: UK CAA believes the text should be amended to allow programmes other than CISM to be used / developed. Justification: CISM is not the only post incident stress management tool. Proposed Text: '(1) adoption of a stress policy and/or critical incident stress management (CISM) or similar policy within the organisation; (7) staff support mechanisms (e.g. peer counselling, professional support from health practitioners, CISM).	
424	AMC/GM to ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 —	49	Paragraph No: GM1 ATS.OR.320(a) Comment: UK CAA believes the text should be amended to allow programmes other than CISM to be used / developed. Justification: CISM is not the only post incident stress management tool. Proposed Text: 'CISM is one of a number of programmes with a view to preparing organisations for the potential aftermath of a serious incident or accident. These come in a number of different forms, but have the added benefit of providing education on the effects of stress, how it affects performance, and its management, even when the incident	

		Human factors:		is relatively minor and perhaps personal to the individual."	
		principles for the provision			
		of air traffic control (ATC)			
		services —			
		GM1 ATS.OR.320			
-		(a) Stress			
	425	AMC/GM to ANNEX III —	49	Page No: 49	
		Specific requirements		Paragraph No: AMC1 ATS.OR.325	
		for the		Comment: UK CAA suggests an amendment to introduce	
		provision of air traffic		proportionality to the amount of support provided	
		services		Justification: As written, there is no limit to the level of	
		(Part-ATS) — SUBPART A —		support to be provided.	
		ADDITIONAL ORGANISATION		Proposed Text: 'Providers of ATC services should provide	
		REQUIREMENT		ATCOs with appropriate staff support mechanisms and	
		FOR THE PROVISION		facilities in order to mitigate effects of fatigue.'	
		OF AIR TRAFFIC			
		SERVICES			
		(ATS.OR) Section 3 —			
		Human factors:			
		principles for			
		the provision of air traffic			
		control (ATC) services —			
		AMC1			
		ATS.OR.325 Fatigue			
Ī	426	AMC/GM to	49	Page No: 49	
		ANNEX III — Specific	53	Paragraph No: : GM1 ATS.OR.325	
		requirements for the			
		provision of		Comment: The large amount of guidance provided is highly technical and falls under the remit of Health and	
		air traffic services		Safety and is not considered Human Factors.	
		(Part-ATS) — SUBPART A —		UK CAA suggests this guidance should be simplified or	
		ADDITIONAL		removed as responsibility for assessing and managing	
		ORGANISATION REQUIREMENT		stress is covered under procedures for the Health and Safety of personnel are covered in alternative European	
		FOR THE PROVISION		legislation i.e. <u>Directive 89/391/EEC on measures to</u>	
		OF AIR		improve safety and health at work	
		TRAFFIC SERVICES			
		(ATS.OR) Section 3 —			
		Human			
		factors: principles for			
		the provision of air traffic			
		or an traille			

		1	ı	i I
	control (ATC)			
	services —			
	GM1 ATS.OR.325			
	Fatigue			
427	_	40	D No. 50	
427	AMC/GM to ANNEX III —	49	Page No: 50	
	Specific	- 53		
	requirements	၁၁	Paragraph No: GM1 ATS.OR.325 Diagram	
	for the			
	provision of		Comment: UK CAA suggests this diagram is deleted. It is	
	air traffic		felt that it adds little value and in this case contradicts the	
	services		definition used previously.	
	(Part-ATS) —			
	SUBPART A —		Justification: Clarity.	
	ADDITIONAL			
	ORGANISATIO			
	REQUIREMENT			
	FOR THE			
	PROVISION			
	OF AIR TRAFFIC			
	SERVICES			
	(ATS.OR)			
	Section 3 —			
	Human			
	factors:			
	principles for			
	the provision			
	of air traffic			
	control (ATC)			
	services — GM1			
	ATS.OR.325			
	Fatigue			
428	AMC/GM to		Page No: 53	
120		153		
		53 -	1 age No. 55	
	ANNEX III — Specific	53 - 54		
	ANNEX III —	-	Paragraph No: AMC1 ATS.OR.330(c)	
	ANNEX III — Specific requirements for the	-	Paragraph No: AMC1 ATS.OR.330(c)	
	ANNEX III — Specific requirements for the provision of	-	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are	
	ANNEX III — Specific requirements for the provision of air traffic	-	Paragraph No: AMC1 ATS.OR.330(c)	
	ANNEX III — Specific requirements for the provision of air traffic services	-	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) —	-	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A —	-	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) —	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR)	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 —	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATION REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC)	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services —	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services — AMC1	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services — AMC1 ATS.OR.330	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	
	ANNEX III — Specific requirements for the provision of air traffic services (Part-ATS) — SUBPART A — ADDITIONAL ORGANISATIOI REQUIREMENT FOR THE PROVISION OF AIR TRAFFIC SERVICES (ATS.OR) Section 3 — Human factors: principles for the provision of air traffic control (ATC) services — AMC1	- 54	Paragraph No: AMC1 ATS.OR.330(c) Comment: UK CAA are unsure whether these criteria are aimed at individual or group rosters.	

	rostering system(s)			
429	AMC/GM to	53	Page No: 53	
127	ANNEX III —	-	1 age No. 55	
	Specific requirements	54	Paragraph No: AMC1 ATS.OR.330(c), sub-paragraph (e)	
	for the		Common to the CAA arranged work work and also also all to a state of	
	provision of		Comment: UK CAA suggest rest periods should be stated in the plural as there can be more than one.	
	air traffic services		in the planar as there can be more than one.	
	(Part-ATS) —		Justification: Clarity.	
	SUBPART A —			
	ADDITIONAL ORGANISATIO		Proposed Text:	
	REQUIREMENT		'(e) minimum rest period s ,'	
	FOR THE			
	PROVISION OF AIR			
	TRAFFIC			
	SERVICES			
	(ATS.OR) Section 3 —			
	Human			
	factors:			
	principles for the provision			
	of air traffic			
	control (ATC)			
	services — AMC1			
	ATS.OR.330			
	(c) ATCOs'			
	rostering system(s)			
130	AMC/GM to	55	Page No: 55	
430	ANNEX IV —	-	rage No. 55	
	Specific	56	Paragraph No: GM1 MET.OR.200 (e)	
	requirements for the			
	provision of		Comment: UK CAA suggest delete the word "Accidental"	
	meteorological		from the title.	
	services (Part-MET) —		Justification: Amendment 76 to ICAO Annex 3 has	
	SUBPART A —		removed the word "accidental" from the provision in	
	ADDITIONAL ORGANISATIOI		Chapter 3 paragraph 3.4.2 (g).	
	REQUIREMENT		Proposed Text: Amend to read:	
	FOR THE		Troposod Toxt. Authorita to Todd.	
	PROVISION OF		'GM1 MET.OR.200(e) Watch and other meteorological	
	METEOROLOGI		information	
	SERVICES		INFORMATION RECEIVED ON RELEASE OF RADIOACTIVE MATERIALS'	
	(MET.OR) — Section 2 —		WATERIALS	
	Specific			
	requirements			
	Chapter 1			
	Requirements			
	for meteorological			
	meteorological watch offices			
	— GM1			
	MET.OR.200			
	(e) Watch			

1	,			1
	and other			
	meteorological information			
431	AMC/GM to	59	Page No: 59	
451	ANNEX XII —	37	rage No. 39	
	Specific		Paragraph No: GM1 ATSEP.OR.005(b) - OPERATE,	
	Requirements for ATM/ANS		MAINTAIN, RELEASE FROM, AND RETURN INTO	
	providers		OPERATIONS	
	regarding			
	personnel		Comment: UK CAA believes the term 'OPERATE' should	
	training and competence		be deleted from the title. The operation in a 'technical sense' rather than 'operational sense' (e.g. by ATCOs) of	
	assessment		systems should be covered by the maintenance, release	
	— SUBPART A		from and return to operations tasks.	
	TECHNICAL		Justification: Clarity.	
	AND ENGINEERING		-	
	ELECTRONIC		Proposed Text: 'OPERATE, MAINTAIN, RELEASE FROM,	
	PERSONNEL		AND RETURN INTO OPERATIONS'	
	Section 1Air traffic			
	safety			
	electronics			
	personnel (ATSEP) —			
	Chapter 1 —			
	General —			
	GM1 ATSEP.OR.005			
	(b) Scope			
432	AMC/GM to	67	Page No: 67	
	ANNEX XII —	-		
	Specific Requirements	68	Paragraph No: Chapter 4 Instructors and Assessors	
	for ATM/ANS		Comment: The UK CAA's previous suggestions in relation	
	providers		to IR ANNEX XII ATSEPs to delete these terms refer.	
	regarding personnel			
	training and		Justification: The reference to such posts existing is	
	competence		prescriptive and unlikely to be applicable to smaller	
	assessment — SUBPART A		Providers in the UK.	
			Proposed Text: Delete or suggest adding 'if appropriate	
	TECHNICAL		to the organisation.	
	AND ENGINEERING			
	ELECTRONIC			
	PERSONNEL			
	Section 1Air traffic			
	safety			
	electronics			
	personnel (ATSEP) —			
	Chapter 4 —			
	Instructors			
	and assessors			
1	ΔMC1			
	— AMC1 ATSEP.OR.140			
	ATSEP.OR.140 Technical			
	ATSEP.OR.140			

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