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Title	Acceptable Means of Compliance and Guidance Material to Commission Regulation (EU) 2015/XXX laying down the common rules of the air and operational provisions regarding services and procedures in air navigation (SERA Part C)
NPA Number	NPA 2015-14

UK CAA (European.Affairs@caa.co.uk) has placed **43** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
385	(General Comments)	0	<p>General Comment:</p> <p>AMC/GM supporting SERA A/B (made under ED Decision 2013/013/R dated 17 July 2013) may have been modified by the final text of the proposed SERA Part C regulation as presented at Single Sky Committee meeting 60 (24 Feb 16). Such changes may not have been foreseen by NPA 2015-14. Similarly, it is possible that several proposed AMC/GM supporting SERA C have been affected by changes made to the SERA Part C text during comitology. In both cases the changes will not have been captured by NPA 2015-14.</p> <p>EASA is asked to clarify how such changes will be addressed by the agency, and whether any such changes will be subject to additional consultation with Member States, Competent Authorities and industry.</p> <p>In addition, given the proximity of SERA Part C Phase 1 effective date, EASA clarification regarding adoption and publication of the supporting AMC/GM is requested in order to facilitate Part C implementation, in particular the timely notification to industry of regulatory changes.</p> <p>Justification: Clarification and facilitation of timely SERA Part C Phase 1 implementation activity.</p>	
386	(General Comments)	0	<p>General Comment</p> <p>Reference Reg (EU) 923 of 2012 Article 2(12) ('aerial work' means an aircraft operation in which an aircraft is used for specialised services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc.)</p> <p>Comment: The definition of 'aerial work' is an aircraft operation in which an aircraft is used for specialized services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc;) – this does not appear to align with the use of 'SPO' in the Ops regulation (e.g. SPO.GEN.005).</p> <p>Justification: The UK CAA seeks clarification and to ensure alignment of terminology applied elsewhere in EU legislation through development of GM explaining link between 'aerial work' and 'Special Operations (SPO) as applied through the Air Ops regulation. Alternatively through further development of IR content.</p>	

387	(General Comments)	0	<p>General Comment</p> <p>Reference Reg (EU) 923 of 2012 SERA.3125</p> <p>Comment: It has been noted that there is no standard requirement for balloon position lights at night, with requirements (when specified) varying throughout member states. Balloons do not regularly fly at night, since it is potentially difficult to see ground obstructions at night (for example electricity power lines) whilst landing. Occasionally, hot-air balloons take-off at night, but plan to land by day. However, gas balloons often take off in the middle of the night (because there is an advantage to departing at the coolest time of the day) when planning endurance flights of potentially several days. Events like the Coupe Aeronautique Gordon Bennett International Gas Balloon Race have seen a number of gas balloons operating from the same event, but displaying several variations of position lights at night, including:</p> <ul style="list-style-type: none"> · a steady red light of at least 5 candela; or · a steady white light of at least 5 candela; or · a flashing white strobe light. <p>Justification: To ensure that all balloons registered in member states and operating in the territory of member states adopt a common lighting requirement for balloon position lights when operating at night. Common requirements will assist all airspace users at night. The UK CAA suggests that EASA introduces a standard requirement for balloon position lights at night. This could, as an interim arrangement, be achieved through AMC stipulating the following options:</p> <ul style="list-style-type: none"> · a steady red light of at least 5 candela; or · a steady white light of at least 5 candela; or · a flashing white strobe light. 	
388	(General Comments)	0	<p>General Comment</p> <p>Reference Reg (EU) XXX of 2016 (SERA Part C) SERA.11010 'In-flight contingencies'</p> <p>Comment: SERA Part C proposes amendment of SERA.11010 'In-flight contingencies' to SERA.11010 'Strayed or unidentified aircraft'. The UK CAA suggests that existing GM1 SERA.11010 'In-flight contingencies' will therefore need amending.</p> <p>Justification: Consistency of text and need to update existing GM.</p> <p>Proposed Text: "Rename extant GM1 SERA.11010 'In-flight contingencies' to read GM1 SERA.11010 'Strayed or unidentified aircraft'."</p>	
389	3.1 Draft EASA Decision — AMC/GM to Commission Regulation (EU) 2015/xxx — GM1 Article 2(89a) Instrument approach	7	<p>Page No: 7, 8, 9, 18-19, 20-24</p> <p>Paragraph No: GM1 Article 2(89a), GM1 Article 2(90), GM1 Article 2(129a), GM1 SERA.5005(c)(3)(iii), GM1 SERA.11014, GM2 SERA.11015</p> <p>Comment: Several definitions (introduction of or amendment to) are planned for</p>	

	procedures		<p>SERA Part C 'Phase 1' implementation. It is therefore assumed that the supporting GM will take effect on the same day as SERA Part C 'Phase 1'. Agency confirmation that this will be the case, and of the means by which Member States, Competent Authorities and industry will be notified is requested..</p> <p>Justification: Clarification</p>	
390	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.4001(c) Submission of a flight plan	9	<p>Page No: 9</p> <p>Paragraph No: AMC1 SERA.4001(c)</p> <p>Comment: It is not clear whether the proposed text intends for the competent authority to prescribe how the flight plan should be submitted to the ATS unit. Following discussions on this issue at ADPSG 65 and NETOPS 12, it was agreed that the flight plan may be submitted by means other than physically to an entity at a reporting office or an ATS unit and that in acknowledging advances in technology, pilots now have the option to submit flight plans via web portals. The agreement was that other acceptable means for submitting flight plans were to be published in the AIP by the competent authority.</p> <p>Justification: The UK CAA believes the current text does not provide clarity on the role of the competent authority.</p> <p>Proposed Text: "AMC1 SERA.4001(c) Submission of a flight plan In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or as prescribed by the competent authority and published in the AIP."</p>	
391	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.4005(a) Contents of a flight plan	9	<p>Page No: 9</p> <p>Paragraph No: GM1 SERA.4005(a)</p> <p>Comment: GM1 SERA.4005(a) Contents of a flight plan already features in Annex to ED Decision 2013/013/R. The UK CAA believes that the text proposed in NPA 2015-14 appears to be additional rather than replacement text and so needs to be numbered as such and requests that the Agency confirm that is indeed the case.</p> <p>Justification: Clarification and correct paragraph numbering.</p> <p>Proposed Text: Rename proposed GM1 SERA.4005(a) to read "GM2 SERA.4005(a) Contents of a flight plan"</p>	
392	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.4005(a) Contents of a flight plan	9	<p>Page No: 9</p> <p>Paragraph No: GM1 SERA.4005(a)</p> <p>Comment: The title of the proposed GM is confusing as it is not clear to whom it is directed. SERA.4005 refers to contents of a flight plan and this is primarily for compliance by Operators. The first sentence of the GM places a requirement on the ATS unit. The second sentence of GM appears to place a requirement on the Operator.</p>	

			<p>Justification: Clarification of applicable actor.</p> <p>Proposed Text: Renumber proposed GM1 SERA.4005(a) to read GM2 SERA.4005(a)</p> <p>Contents of a flight plan and amend to read: "INFORMATION PROVIDED IN THE FLIGHT PLAN CONCERNING THE AIRCRAFT OPERATOR. According to ICAO Annex 11, an ATS unit shall, when practicable, inform the aircraft operator when an alerting service is provided to an aircraft. In order to facilitate quick and effective coordination, it is advisable for the Operator to provide in the flight plan (item 18 `Other information'), information sufficient to enable the ATS unit to contact the on-duty staff of the aircraft operator if such information has not been provided to the ATS unit by other means."</p>	
393	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.5005(c)(3)(Night VFR on top	9 - 10	<p>Page No: 9-10</p> <p>Paragraph No: GM1 SERA.5005(c)(3)(iii), GM1 SERA.5010, GM1 SERA.5010(a)(2), GM2 SERA.5010(b),</p> <p>Comment: Several current items of GM are affected by SERA Part C 'Phase 1' implementation. It is therefore assumed that associated changes to these will take effect on the same day as SERA Part C 'Phase 1'. The UK CAA requests Agency confirmation that this will be the case, and of the means by which Member States, Competent Authorities and industry will be notified..</p> <p>Justification: Clarification.</p>	
394	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.5010 Special VFR in control zones	10	<p>Page No: 10</p> <p>Paragraph No: SERA.5010</p> <p>Comment: SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing AMC1 and GM1 to SERA.5010(a)(3) will no longer be applicable.</p> <p>Justification: Clarification on alignment of existing AMC/GM with new GM.</p> <p>Proposed Text: "Retain existing AMC and GM to SERA.5010(a)(3) but re-title as AMC1 SERA.5010(b)(3) & GM2 SERA/5010(b)(3)."</p>	
395	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.5010(a)(2) Special VFR in control zones	10	<p>Page No: 10</p> <p>Paragraph No: GM1 SERA.5010(a)(2)</p> <p>Comment: SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing SERA.5010(a)(2) will no longer exist so current GM will no longer be applicable.</p> <p>Justification: Realignment of existing AMC/GM with new GM.</p> <p>Proposed Text:</p>	

			"Re-title GM as GM1 SERA.5010(b)(2)."	
396	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.5010(b) Special VFR in control zones	10	<p>Page No: 10</p> <p>Paragraph No: GM2 SERA.5010(b)</p> <p>Comment: SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing GM appears to apply to the ATS provider, and the rule is contained in paragraph 5010(c).</p> <p>Justification: Realignment of existing AMC/GM with new GM.</p> <p>Proposed Text: "Re-title GM as GM1 SERA.5010(c)."</p>	
397	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	<p>Page No: 10-11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1)</p> <p>Comment: AMC1 SERA.7002(1)(a) appears to preclude the use of cardinal points for reporting the relative position of conflicting traffic when the traffic receiving service is manoeuvring. An aircraft may be turning when it becomes necessary to pass traffic information on conflicting traffic to it. A turning aircraft cannot use the clock code to understand relative position as one does not know what the actual clock code position would be at any given time.</p> <p>Justification: The need to facilitate best possible situational awareness when passing traffic information to turning aircraft.</p> <p>Proposed Text: (a)(1) relative bearing of the conflicting traffic in terms of the 12-hour clock or, when the aircraft is turning, direction of the unknown aircraft by compass points, e.g., northwest, south, etc.;</p>	
398	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	<p>Page No: 11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (a)(2)</p> <p>Comment: The UK CAA believes that although this option is given in parenthesis as per PANS-ATM Chapter 12 style, it is not absolutely clear in this textual context that this is the intention. It would be better to link with an 'or'.</p> <p>Justification: Optional means of providing distance information, and of increasing clarity of understanding of presented text.</p> <p>Proposed Text: "(a)(2) distance from the conflicting traffic in kilometres or nautical miles;"</p>	
399	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1	10 - 11	<p>Page No: 11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (a)(3)</p> <p>Comment:</p>	

	SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided		<p>The UK CAA believes that guidance regarding the options available to ATS providers is considered necessary in order to empower them to provide the clearest and best possible traffic information in order to facilitate the highest possible degree of situational awareness according to circumstances.</p> <p>Justification: The UK CAA believes there is a need for pilots and ATS providers to understand, and apply, the best possible means of describing the relative track of aircraft that are the subject of traffic information.</p> <p>Proposed Text: "GM2 to AMC1 SERA.7002(a)(1), sub-paragraph (a)(3) The direction in which the conflicting traffic appears to be proceeding in relation to the aircraft under service may be presented in terms of crossing left to right (or vice versa), in terms of compass points, or in the opposite direction, e.g. 'traffic is opposite direction/crossing left to right/or converging from the left/westbound' etc. and"</p>	
400	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	<p>Page No: 11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (b)</p> <p>Comment: Use of word "verified", "unverified" – the UK CAA seeks clarification of what these terms mean.</p> <p>Justification: Clarification.</p> <p>Proposed Text: "Define both terms."</p>	
401	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	<p>Page No: 11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (b)</p> <p>Comment: Level information does not indicate location. The UK CAA suggests the final sentence (Erroneous level information should not be used in providing collision hazard information.) appears to be embellishment of source PANS-ATM text and adds no value.</p> <p>Justification: Use of correct terminology and removal of extraneous text.</p> <p>Proposed Text: "(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the proximity of a collision hazard."</p>	
402	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based	10 - 11	<p>Page No: 11</p> <p>Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (b)(1)</p> <p>Comment: The UK CAA suggests it is not clear how the level information may be passed. We recommend that GM is published to support AMC1. In the UK the phrase "AT" is used to indicate verified level information</p>	

	on surveillance are provided		and the phrase "INDICATING" is used to indicate unverified level information." Justification: Clarification.	
403	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	Page No: 11 Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (b)(2) Comment: If the level of the unknown traffic is considered erroneous, the UK CAA seeks clarification of how the controller receives this information from the pilot of the unknown traffic if the pilot of the unknown traffic is not communicating with the controller. Justification: Clarification	
404	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	10 - 11	Page No: 11 Paragraph No: AMC1 SERA.7002(a)(1), sub-paragraph (b)(3) Comment: The UK CAA suggests it is not clear how the level information may be passed. Justification: Clarification. Proposed Text: "Publish GM to support AMC1. In the UK the phrase "AT" is used to indicate verified level information and the phrase "INDICATING" is used to indicate unverified level information."	
405	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	11	Page No: 11 Paragraph No: GM2 SERA.7002(a)(1) Comment: The UK CAA suggests this should be GM2 <i>to AMC 1</i> SERA.7002(a)(1) etc. Justification: Correct potential typographical error. Proposed Text: Rename paragraph.	
406	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	11	Page No: 11 Paragraph No: GM2 SERA.7002(a)(1) Comment: As with SERA 7002(a) itself, the UK CAA suggests that the conflicting traffic needs to constitute a collision hazard before avoiding action advice is given. Justification: Clarity of guidance and consistency with IR text. Proposed Text: "When an identified IFR flight operating outside controlled airspace is	

			observed to be on a conflicting path with another aircraft deemed to constitute a collision hazard , the pilot should:"
407	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	11	<p>Page No: 11</p> <p>Paragraph No: GM2 SERA.7002(a)(1)(a)</p> <p>Comment: The UK CAA suggests that ATC would not advise a pilot of the need for avoiding action. This is either considered necessary by the controller and supplied, or is requested by the pilot after traffic information has been provided.</p> <p>Justification: Clarity of guidance and consistency with IR text.</p> <p>Proposed Text: "a) be informed of the traffic and if so requested by the pilot or if, in the opinion of the controller, the situation warrants, a course of avoiding action should be suggested; and"</p>
408	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided	12	<p>Page No: 12</p> <p>Paragraph No: GM4 SERA.7002(a)(1)</p> <p>Comment: The UK CAA recommends that this text should also include any collision avoidance advice.</p> <p>Justification: Address anomalous text.</p> <p>Proposed Text: "The provision of traffic and/or collision avoidance advice does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC."</p>
409	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.10001(c) Application	14	<p>Page No: 14</p> <p>Paragraph No: GM1 SERA.10001(c) 'Application'</p> <p>Comment: The UK CAA suggests that it is not clear what 'the aeronautical telecommunication station serving the ATS unit in charge of the FIR in which the aircraft is flying' means in practice. We would welcome clarification.</p> <p>Justification: Clarification.</p>
412	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.11001 General	14 - 15	<p>Page No: 14</p> <p>Paragraph No: GM1 SERA.11001(a)(1) 'General'</p> <p>Comment: Turning away from the track may be appropriate for en-route flight along bi-directional airways but in busy TMAs where closely spaced parallel tracks and radar vectors are predominantly part of the airspace design and CONOPS, the UK CAA suggests that turning away may bring the aircraft into conflict with other aircraft. Consideration should be given that turning away from the track may not be advisable in busy TMA airspace.</p>

			<p>Justification: Potential unintended adverse safety consequences</p> <p>Proposed Text: “(1) initiate a turn away from the assigned route or track before commencing the emergency descent. Consideration should be given to remaining on track in aware of aircraft in close proximity;”</p>	
413	3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.11005 Unlawful interference	15 - 16	<p>Page No: 15</p> <p>Paragraph No: AMC1 SERA.11005(a)(1) ‘Unlawful interference’</p> <p>Comment: The UK CAA suggests consideration should be given to developing guidance to enhance awareness of the possibility of ATS actions causing a negative impact on the flight deck e.g. RT transmissions that draw unnecessary attention to the fact that an unlawful interference has occurred.”</p> <p>Justification: Comprehensive guidance.</p>	
414	3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.11013(b) Degraded aircraft performance	17 - 18	<p>Page No: 18</p> <p>Paragraph No: GM1 SERA.11013(b)(d) ‘Degraded aircraft performance’</p> <p>Comment: In addition to reverting to own navigation, the UK CAA suggests that ATC could also provide radar vectors to affected aircraft.</p> <p>Justification: Widening options and completeness of GM.</p> <p>Proposed Text: “(d) Subsequent ATC action in respect of an aircraft that cannot meet the specified requirements due to a failure or degradation of the RNAV system will be dependent upon the nature of the reported failure and the overall traffic situation. Continued operation in accordance with the current ATC clearance may be possible in many situations. When this cannot be achieved, a revised clearance may be required to revert to VOR/DME navigation. Alternatively, radar vectors may be provided.”</p>	
415	3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.11014 ACAS resolution advisory (RA)	18	<p>Page No: 18</p> <p>Paragraph No: GM1 SERA.11014 ACAS resolution advisory (RA)</p> <p>Comment: The UK CAA seeks clarification as to how and/or by whom the performance of ACAS is to be monitored within the ATC environment. The UK CAA believes that the text is an amalgamation of PANS-ATM 15.7.3.5 and Note to 15.7.3.6. In PANS they address two different issues but combined here they can be interpreted to mean that ATC is responsible for monitoring the performance of the ACAS system. In practice this is system engineering function. EUROCONTROL ACAS monitoring is performed by function Voluntary ATM Incident Reporting (EVAIR) scheme. ACAS data has been</p>	

			<p>collected by means of manual reporting (incident reports from airlines and ANSPs and automated reporting via the Automated Safety Monitoring Tool. The data is also automatically collected from a number of Mode S radars. The UK CAA seeks clarification as to whether SERA Part C's text (IR/AMC/GM) foresees (or generates) any changes to this arrangement.</p> <p>Justification: Clarification.</p>	
416	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.11014 ACAS resolution advisory (RA)	18	<p>Page No: 18</p> <p>Paragraph No: GM2 SERA.11014 ACAS resolution advisory (RA)</p> <p>Comment: The proposed text states that 'Nothing in the procedures specified in SERA.11014 should prevent pilots-in-command from exercising their best judgement and full authority in the choice of the best course of action to resolve a traffic conflict or avert a potential collision'. Source text at ICAO Doc 8168 (PANS-OPS) Vol I, Part III, Section 3, Chapter3, 3.1.3 states that 'nothing in the procedures specified....shall prevent pilots-in-command from exercising their best judgement and full authority in the choice of the best course of action to resolve a traffic conflict or avert a potential collision'. The UK CAA suggests it is an important principle regarding the use of ACAS and should be afforded IR status within SERA.</p> <p>Justification: Anomaly between ICAO and SERA content requires clarification as to why text was determined to be AMC not IR.</p>	
417	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.11015 Interception	20 - 24	<p>Page No: 20</p> <p>Paragraph No: GM2 SERA.11015 Interception para 1.1</p> <p>Comment: The UK CAA believes that the statement 'Practice interception of civil aircraft is not to be undertaken' is too restrictive.</p> <p>Justification: Interception training is required to ensure that Member States are capable of undertaking such activities when called upon to do so.</p> <p>Proposed Text: "Practice interception of civil aircraft is not to be undertaken unless prior agreement has been reached to conduct such activity with the pilot and or operator of the civil aircraft concerned."</p>	
418	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.11015 Interception	20 - 24	<p>Page No: 22</p> <p>Paragraph No: GM2 SERA.11015 Interception para 2.4.2</p> <p>Comment: The UK CAA suggest that the purpose and intent of the word "indispensable" is unclear in this context. It can be read as meaning that the pilot shall carry out the action, in which case the UK CAA recommends that the text is more properly IR or, at the very least, AMC.</p> <p>Justification: Clarification.</p>	
419	3.1 Draft EASA	20 -	<p>Page No: 23</p>	

	Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.11015 Interception	24	<p>Paragraph No: GM2 SERA.11015 Interception para 4</p> <p>Comment: Use of phrase “adhere strictly” suggests that the pilot shall carry out the action, in which case the UK CAA recommends that the text is more properly IR, and is therefore not appropriate for it to be cast as GM.</p> <p>Justification: Elevation of text to I</p>
420	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.12020 Exchange of air- reports	24	<p>Page No: 24</p> <p>Paragraph No: AMC1 SERA.12020 Exchange of air-reports</p> <p>Comment: The UK CAA suggests that it is not clear who is responsible for passing these forecasts. ATC do not verbally pass forecasts up to 60 mins flying time from the aerodrome. ATIS broadcasts may not be able to be received 60 mins flying time from the aerodrome. It is recommended that the text is amended to clarify which agency is responsible for passing the subject forecasts</p> <p>Justification: Clarification.</p>
421	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.13001(c) Operation of SSR transponder	25	<p>Page No: 25</p> <p>Paragraph No: GM1 SERA.13001(c) Operation of SSR transponder</p> <p>Comment: The UK CAA suggests that the current text could be improved slightly.</p> <p>Justification: Clarity.</p> <p>Proposed Text: “Pilots of non-powered aircraft are also encouraged to operate the transponder during flight outside airspace where carriage and operation of SSR transponder is mandatory.”</p>
422	3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.13010(b) Pressure- altitude-derived information	25 - 26	<p>Page No: 25</p> <p>Paragraph No: GM1 SERA.13010(b), sub-paragraph (b) Pressure-altitude-derived information</p> <p>Comment: 'A common operational solution to incorrect level information is to ask the pilot to switch to an alternative transponder before asking the pilot to stop Mode C transmissions.'</p> <p>Justification: Completeness of guidance based upon operational experience and practice.</p> <p>Proposed Text: (1) request the pilot to select and operate an alternative transponder. (2) If the aircraft is not equipped with an alternative transponder or the alternative transponder also displays the discrepancy, request</p>

			the pilot to stop Mode C or ADS-B altitude data transmission, provided this does not cause the loss of position and identity information, and notify the next control positions or ATC unit concerned with the aircraft of the action taken; or (3) inform the pilot of the discrepancy..... etc.”	
423	3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes	28	<p>Page No: 28</p> <p>Paragraph No: AMC1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes</p> <p>Comment: The text relates to the non-verbal identification of ATS routes and is not appropriate in Section 14 Voice Communication Procedures. The UK CAA suggests this has no bearing on SERA.14025</p> <p>Justification: Removal of inappropriate text.</p> <p>Proposed Text: “Delete text.”</p>	
424	3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14090(b) Specific communication procedures	34	<p>Page No: 34</p> <p>Paragraph No: GM1 SERA.14090(b) Specific communication procedures</p> <p>Comment: While the value of the proposed GM is not in question, the UK CAA suggests that it is inappropriate to present it under SERA.14090 and that it is more appropriate to present it either as GM to Reg 923/2012 Article 2(27) or SERA.6001(f). Alternatively the text could be deleted and instead incorporate it into the forthcoming Part-ATS.</p> <p>Justification: Presentation of text in a more appropriate place.</p>	
425	6. Appendices — Appendix I — AMC1 SERA.14001 General	40 - 77	<p>Page No: 40</p> <p>Paragraph No: AMC1 SERA.14001 General para 1.1.2</p> <p>Comment: The UK CAA suggests that the word “TO” in these examples is not considered to add any value to the ATC instruction and as it is used frequently it adds to RTF loading in busy airspaces.</p> <p>Justification: Increased controller workload.</p> <p>Proposed Text: <i>“1.1.2 Level Changes Reports and Rates a) CLIMB (or DESCEND); followed as necessary by; 1) (LEVEL) 2) AND MAINTAIN BLOCK (level) TO (level)”</i></p>	
426	6. Appendices — Appendix I — AMC1 SERA.14001 General	40 - 77	<p>Page No: 42</p> <p>Paragraph No: AMC1 SERA.14001 Appendix I General para 1.1.4</p>	

			<p>Comment: The UK CAA suggests that normal instruction would be "CONTACT (unit callsign) (frequency)". Interpretation of "STANDBY" is for the pilot to wait for further instructions on the current channel. "STANDBY FOR" has the potential for an aircraft to not change channel but to remain on current channel and wait until instructed to change channel to the new unit and frequency.</p> <p>Justification: Unintended consequence.</p>	
427	6. Appendices — Appendix I — AMC1 SERA.14001 General	40 - 77	<p>Page No: 44</p> <p>Paragraph No: AMC1 SERA.14001 Appendix I General para 1.1.8</p> <p>Comment: The UK CAA seeks clarification of how wind information is to be expressed if the wind is calm.</p> <p>Justification: Clarification.</p>	
428	6. Appendices — Appendix I — AMC1 SERA.14001 General	40 - 77	<p>Page No: 47</p> <p>Paragraph No: AMC1 SERA.14001 Appendix I General para 1.1.11</p> <p>Comment: Paragraphs g) & h) were amended in PANS-ATM amendment 6. Paragraph i) was deleted in PANS-ATM amendment 6</p> <p>Justification: Incorrect transposition.</p>	
429	6. Appendices — Appendix I — AMC1 SERA.14001 General	40 - 77	<p>Page No: 74</p> <p>Paragraph No: AMC1 SERA.14001 Appendix I General para 2.3.9</p> <p>Comment: The UK CAA advises that A7700 is the emergency code and covers Mayday and Pan situations. Therefore ATC ask pilot to squawk emergency and not Mayday.</p> <p>Justification: Incorrect terminology.</p> <p>Proposed Text: "2.3.9 TO REQUEST EMERGENCY CODE SQUAWK EMERGENCY [CODE SEVEN-SEVEN-ZERO-ZERO]."</p>	