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Title	Requirements for air traffic services
NPA Number	NPA 2016-09(B)

UK CAA (European.Affairs@caa.co.uk) has placed **145** unique comments on this NPA:

Cmt#	Segment description	Page	Comment	Attachments
564	(General Comments)	0	Given the increasing amount of aviation-related EU regulatory material that is either derived from ICAO through transposition or created by EASA, an EASA-maintained lexicon of common terms – essentially a compendium of all definitions and abbreviations that appear in regulatory material 'parented' by the EASA Basic Regulation is considered necessary. Incorporation of terms used in material 'parented' by the Single European Sky should also be incorporated. Such a lexicon can be hosted on the EASA and Eurocontrol websites and amended as terms are introduced, amended or withdrawn. As such it would be the EASA equivalent of ICAO Doc 9713 — International Civil Aviation Vocabulary. **Justification:** Such a lexicon would ensure consistency of understanding and application of the terms and abbreviations used within aviation-related EU regulatory material by the EU, its agencies, Member States and industry alike. **Proposed Text:** A compendium of all definitions that appear in regulatory material 'parented' by the EASA Basic Regulation (as amended).	
565	(General Comments)	0	General comment Reference Regulation 2016/1377 (and replacement text adopted by Single Sky Committee) **Paragraph No: Annex I(2), Annex I(57), ATM/ANS.OR.A.010 'Application for a limited certificate',** **Comment:** Regulation 2016/1377 (and successor replacement text adopted by Single Sky Committee in December 2016) defines 'aerial work' as meaning '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'. The use of the term 'aerial work' within the ATM Common Requirements Regulation does not appear to align with the use of the term 'Specialised operation" (any operation other than commercial air transport where the aircraft is used for specialised activities such as agriculture, construction, photography, surveying, observation and patrol, aerial advertisement) in the Ops Regulation (EU) No 965/2012 (as amended) e.g. SPO.GEN.005. 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 the ATM Common requirements regulation to replace 'aerial work' with 'specialised operations'. **Justification:** Consistency with other EU regulation. **Proposed Text:** Delete Annex I (2) and insert new Annex I(95A): "Specialised operation" means any operation other than commercial air transport where the aircraft is used for specialised activities such as agriculture, construction, photography, surveying, observation and patrol, aerial advertisement. Supporting GM is also considered necessary: **GM1 Annex I(95A) Specialised operation** (a) Specialised operations include the following activities: (1) helicopter external loads operations; (2) helicopter survey operations; (3) human external cargo operations; (4) parachute operations and skydiving; (5) agricultural flights; (6) aerial photography flights; (7) glider towing; (8) aerial advertising flights; (9) calibration flights; (10) construction work flights, including stringing power line operations, clearing saw operations; (11) oil spill work; (12) avalanche mining operations; (13) survey operations, including aerial mapping operations, pollution control activity; (14) news media flights, television and movie flights; (15) special events flights, including such as flying display and competition flights; (16) aerobatic flights; (17) animal herding, animal rescue flights and veterinary dropping flights; (19) scientific research flights (other than those under Annex II to Regulation (EC) No 216/2008); (20) cloud seeding; and (21) sensational flights: flights involving extreme aerobatic manoeuvres carried out for the purpose of allowing the persons on board to experience zero gravity, high G-forces or similar sensations.	
566	(General Comments)	0	General comment Reference Regulation 2016/1377 (and replacement text adopted by Single Sky Committee) Annex IV **Paragraph No:** ATS.OR.300 **Comment:** SERA Art 2(116) defines 'safety-sensitive personnel' as meaning 'persons who might endanger aviation safety if they perform their duties and functions improperly including, but not limited to, crew members, aircraft maintenance personnel and air traffic controllers'. Its supporting GM states that 'safety-sensitive personnel' may also include aerodrome operations personnel, rescue and firefighting personnel, aerodrome maintenance personnel and other personnel allowed unescorted access on the movement area. There is no similar requirement in ATS.OR.300, the psychoactive substance abuse context instead being limited to air traffic	

			controllers. Consideration of other safety-critical ATM roles is warranted. Given Annex XIII 'Part-PERS' and the emphasis within NPA 2016-09 on FISO and AFISO functions, it is not clear why NPA 2016-09 does not propose to include these within the scope of ATS.OR.300. Indeed, consideration should be given to widening the scope of parts of ATS.OR.300 to capture all ATS personnel as proposed. **Justification:** Consistency with other EU legislation; enhanced aviation safety; consistent personnel requirements. **Proposed Text:** **Section 3 — Specific human factors requirements for air traffic ~~control~~ service providers** **ATS.OR.300 Scope** This section establishes the requirements to be met by the air traffic ~~control~~ service provider with regard to human performance in order to: (a) prevent and mitigate the risks ~~that~~ to air traffic ~~control~~ service provision ~~is~~ that are attributable to the problematic use of psychoactive substances ~~provided~~ by air traffic ~~controllers~~ service personnel ~~with problematic use of psychoactive substances~~; (b) prevent and mitigate the negative effects of stress on air traffic ~~controllers~~ service personnel to ensure the safety of air traffic; (c) prevent and mitigate the negative effects of fatigue on air traffic controllers to ensure the safety of air traffic. **ATS.OR.305 Responsibilities of air traffic ~~control~~ service providers with regard to the problematic use of psychoactive substances by air traffic ~~controllers~~ service personnel** (a) An air traffic ~~control~~ service provider shall develop and implement a policy, with related procedures, in order to ensure that the problematic use of psychoactive substances does not affect the provision of air traffic ~~control~~ services. (b) Without prejudice to provisions laid down in Directive 95/46/EC of the European Parliament and of the Council[1] and to the applicable national legislation on testing of individuals, the air traffic ~~control~~ service provider shall develop and implement an objective, transparent and non-discriminatory procedure for the detection of cases of problematic use of psychoactive substances by air traffic ~~controllers~~ service personnel. This procedure shall take into account provisions laid down in point ATCO.A.015 of Regulation (EU) No 2015/340. The procedure in point (b) shall be approved by the competent authority. [1] Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (OJ L 281, 23.11.1995, p. 31).	
598	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Paragraph No:** 1.1.2 definition of 'Aerodrome flight information service'. **Comment:** By deleting the text referring to the provision of an alerting service, the proposed amendment to the definition of aerodrome flight information service (FIS) implies that aerodrome FIS is being established as a separate ATS alongside air traffic control (ATC) service, FIS, air traffic advisory service and an alerting service. However, aerodrome FIS is only an aspect of FIS in the same way that an aerodrome control service is part of an ATC service. The UK CAA considers it essential that aerodrome FIS is not	

			presented as an ATS in its own right in order to avoid confusion amongst ATS providers and airspace users, and to avoid inadvertent contradiction of ICAO Annex 11 and PANS-ATM. **Justification:** In accordance with ATS.TR.110(a)(3), aerodrome FIS means the provision of FIS and alerting service to aerodrome traffic; therefore the extant definition should be retained. **Proposed Text:** Amend to read: 'Aerodrome flight information service (AFIS)' means flight information service **and alerting service for aerodrome traffic at an aerodrome** provided at an aerodrome by an ATS provider designated in accordance with Article 8(1) of Regulation (EC) No 550/2004;	
600	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Paragraph No:** 1.1.2 definition of 'Aeronautical telecommunication station' **Comment:** The definition of an 'Aeronautical telecommunication station' refers to the aeronautical telecommunication service; however, this latter term is not defined within EASA's regulatory framework. **Justification:** For consistency with ICAO Annex 10 Vol II and within the European regulatory context, propose to transpose the ICAO definition of an 'Aeronautical telecommunication station' **Proposed Text:** Add new definition: "***Aeronautical telecommunication service.*** **A telecommunication service provided for any aeronautical purpose.**"	
602	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Paragraph No:** 1.1.2 definition of 'Aircraft proximity'. **Comment:** EASA have correctly transposed a majority of the definition of 'aircraft proximity' contained within PANS-ATM but have omitted the text from the 4th sub-paragraph related to where a risk of aircraft proximity was not determined; no rationale for this omission is included within the text of NPA 2016-09(A). EASA should clarify their rationale for omitting the PANS-ATM text, or should transpose the text as indicated below. **Justification:** Consistency with source ICAO Doc 4444 PANS-ATM text. **Proposed Text:** Add sub-paragraph (d): "**(d) Risk not determined. The risk classification of an aircraft proximity in which insufficient information was available to determine the risk involved, or inconclusive or conflicting evidence precluded such determination.**"	
604	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Paragraph No:** 1.1.2 definition of 'Change-over point'. **Comment:** See Regulation (EU) 923/2012 Standardised European Rules of the Air Article 2(51) GM1. This GM, which is sourced from a note to the definition in Annex 11, has not been included within the proposed Part-ATS provisions. The definition and its accompanying GM were not affected by Regulation (EU) 1185/2016 (SERA Part C). UK CAA invites EASA to clarify the reason for omitting the GM currently contained in GM1 Article 2(51) of Regulation (EU)	

			923/2012, or transpose the text from SERA. **Justification:** Consistency with ICAO Annex 11 and Reg (EU) 923/2012.	
608	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Paragraph No:** 1.1.2 Omission of a definition for 'UNICOM' **Comment:** EASA propose to introduce the term UNICOM through GM2 Article 3(1b)a, GM3 ATS.OR.125(a) and GM1 ATS.TR.115 and refer to the concept within GM1 to the definition of 'aerodrome flight information service'; however, a definition of the term UNICOM is not defined within the proposed amendments to Annex 1. In introducing this new and unique concept of UNICOM within the EU regulatory framework, a definition of the term requires development. **Justification:** Consistency and clarity.	
952	1.1.2. Amendments to Annex I — Definitions	4 - 14	**Page No:** 7 **Paragraph No:** 1.1.2 definition of 'Controlled aerodrome'. **Comment:** Through Part-ATS, EASA propose to amend the definition of 'controlled aerodrome' currently contained within Regulation (EU) 923/2012 Article 2(57) by deleting the final 8 words of the definition, "regardless whether or not a control zone exists." It is noteworthy that this amendment was introduced following the conclusion of the work of RMG.0464 to develop Part-ATS and the Aerodrome FIS thematic meeting held by EASA on 17 March 2016. EASA's rationale for the amendment to the definition of 'controlled aerodrome' is contained in NPA 2016-09(a) (page 15) and describes the need to align with Regulation (EC) 550/2004 and the provision of ATS within specific airspace blocks. However, the proposed amendment does not provide clarity on the airspace associated with or designated to a 'controlled aerodrome'. **Justification:** Clarity is required within the definition of 'controlled aerodrome' regarding the airspace associated with or designated to a 'controlled aerodrome'. **Proposed Text:** Amend to read: "'Controlled aerodrome' means an aerodrome at which ATC service is provided to aerodrome traffic **within the designated airspace associated with such aerodromes**;"	
611	1.1.3. Amendments to Annex IV — Subpart A — Section 1 - ATS.OR.120	15	**Paragraph No:** ATS.OR.120(a) **Comment:** EASA has not accurately transposed the intent of ICAO Annex 11 2.21.1 in that the proposal within Part-ATS removes the flexibility that was included therein. The original ICAO Annex 11 text states that "…arrangements shall be made, **where necessary**, between meteorological and air traffic services authorities for air traffic services personnel." **Justification:** Consistency with ICAO Annex 11. **Proposed Text:** Amend to read: "(a) To ensure that aircraft receive the most up-to-date meteorological information for aircraft operations, the ATS provider shall arrange, **as necessary**, with the meteorological services	

			provider for ATS personnel:"	
612	1.1.3. Amendments to Annex IV — Subpart A — Section 1 - ATS.OR.140	16	**Paragraph No:** ATS.OR.140 **Comment:** ATS.OR.140 does not specify the nature or purpose of the report referred to, or to whom the report should be made. This issue was raised with EASA at their Part-ATS consultation workshop on 30 November 2016 and EASA stated their belief that the ATS provider's role was to discern, through their SMS, the purpose of the report and the reporting mechanism. Given EASA's statement at the 30 November workshop, the UK CAA invites EASA to develop GM to provide clarity on the intent of ATS.OR.140. **Justification:** Clarity of EU regulatory materials.	
619	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.400	17	**Paragraph No:** ATS.OR.400(b) **Comment:** ATS.OR.400(b) includes the term 'very remote'. However, this term can have specific meaning in a risk analysis context; for instance 'extremely remote' (a term which could be viewed as roughly analogous to 'very remote') has been associated with a failure rate of $1x10^{-7}$ to $1x10^{-9}$ events per flight hour (ICAO Doc 9859 – Safety Management Manual). Consequently, the use of such a term within EU regulatory materials could introduce confusion. Acknowledging that the text of ATS.OR.400(b) is aligned with that of its source (PANS-ATM 8.3.1), the UK CAA invites EASA to clarify what is meant by 'very remote' and to develop clarifying GM. **Justification:** Clarity of EU Regulatory materials.	
623	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.405 1.2. Amendments to the SERA Regulation (draft Opinion) - (7) SERA.14095	17 - 18 51 - 52	**Paragraph No:** ATS.OR.405 and SERA.14095 **Comment:** The UK CAA wishes to propose additional wording in the proposed ATS.OR.405 which would introduce sufficient flexibility to permit the conduct of emergency training on 121.5 MHz. The UK is unique in the world in the way in which it delivers ATS on the emergency channel (121.5 MHz). The task of monitoring 121.5 MHz and responding to aircraft in distress or emergency within UK airspace is vested in a single, centralised cell (the Distress and Diversion (D&D) Cell) located within the Swanwick ACC which is manned by controllers and support staff 24 hours a day, 365 days per year. The purpose of establishing this facility on 121.5 MHz was to reduce workload at individual area control sector working positions and at civil aerodromes within D&D's area of coverage; to mitigate the risk of airspace infringement, particularly in the vicinity of the London TMA; and to mitigate the risk of Prolonged Loss of Communication incidents affecting commercial air transport. In order to conduct training for D&D Cell staff and to familiarise flight crews with the service provided by D&D, the UK has filed a difference against ICAO Annex 10 Volume V 4.1.3.1.1. Research undertaken by the UK CAA indicates that the 5-year average of training events per day on 121.5 MHz reaches a peak of 4.5 events per day during the summer and a low of 1.8 events per day during the winter. Experience indicates that the average RTF occupancy for each event is 42 seconds, which equates to a 5-year average peaking at 189 seconds per day during the summer and 76 seconds during the winter. Whilst acknowledging that a concentration of events can occur at weekends, it is reasonable to argue that the conduct of practice emergencies on 121.5 MHz has limited impact upon others users of 121.5 MHz. Moreover, given that the D&D Cell has access to multiple transmitter and receiver sites around the UK,	

			the recognition and handling of genuine emergencies is not affected and the provision of “a clear channel between aircraft in distress or emergency” and the D&D Cell is assured. **Justification:** Threats posed by the loss of ability to conduct emergency training on 121.5 MHz are: · a reduced familiarity of pilots in the procedures for the use of the emergency channel; · a loss of ‘live’ training opportunities for D&D Cell staff; · an increased severity of airspace infringement incidents if pilots are unfamiliar with the procedures for use of 121.5 MHz and thus do not monitor the frequency or do not contact the D&D Cell in the event of being in a state of distress or emergency; and, · an increased probability of LOC-I and CFIT recreational aviation accidents as a result of reduced familiarity in pilots of the benefits posed by the use of 121.5 MHz leading them not to contact the D&D Cell. **Proposed Text:** The UK CAA proposes flexibility to conduct training on 121.5 MHz through the following amendment to ATS.OR.405(a) and SERA.14095 and the development of an additional appendix to Article 3 of the ATM/ANS Common Requirements Regulation as follows: ATS.OR.405 “(a) **Except where otherwise approved by the Member State**, the emergency channel (121.500 MHz) shall be used only for genuine emergency purposes, as broadly outlined in the following, to provide: …” and: **Appendix XX to Article 3 and SERA.14095(a)(7) Very High Frequency (VHF) emergency channel** “USE OF VHF EMERGENCY CHANNEL FOR TRAINING Member States shall ensure that, where the emergency channel (121.500 MHz) is used for training purposes, such activities are limited to the extent necessary to achieve their aim, in order to reduce the impact upon aircraft in distress or emergency.”	
629	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.410	18	**Paragraph No:** ATS.OR.410(a) **Comment:** The UK CAA interprets the intent of ATS.OR.410(a) as referring to the provision of a FIS from a FIC; however, the text is not explicit in this regard. Without amendment, the text could be misinterpreted as being applicable to aerodrome FIS units. The UK CAA proposes refinement to ATS.OR.410(a) to highlight that it relates to the provision of flight information service from a flight information centre. **Justification:** Accuracy and completeness of EU regulatory material. **Proposed Text:** Amend to read: “(a) The ATS provider shall ensure, to the practicable extent and as approved by the competent authority, that air–ground communication facilities enable two-way communications to take place between a **FIC** providing flight information service and appropriately equipped	

			aircraft flying anywhere within the flight information region." **Paragraph No:** ATS.OR.410(a) **Comment:** The UK CAA interprets the intent of ATS.OR.410(a) as referring to the provision of a FIS from a FIC; however, the text is not explicit in this regard. Without amendment, the text could be misinterpreted as being applicable to aerodrome FIS units. The UK CAA proposes refinement to ATS.OR.410(a) to highlight that it relates to the provision of flight information service from a flight information centre. **Justification:** Accuracy and completeness of EU regulatory material. **Proposed Text:** Amend to read: "(a) The ATS provider shall ensure, to the practicable extent and as approved by the competent authority, that air–ground communication facilities enable two-way communications to take place between a **FIC** providing flight information service and appropriately equipped aircraft flying anywhere within the flight information region."	
630	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.410	18	**Paragraph No:** ATS.OR.410(b) **Comment:** ATS.OR.410(b) states that "…operating within the airspace defined as in ATS.TR.110(a)(3) or, when such airspace is not defined, in the vicinity of the aerodrome." However, ATS.TR.110(a)(3) does not define airspace, it describes a "portion of airspace associated with such aerodrome flight information service aerodromes." The UK CAA believes that it is necessary to remove the direct link between airspace and the provision of the aeronautical mobile service by incorporating within the text an association between the provision of air-ground communication facilities and appropriately equipped aircraft operating as aerodrome traffic. This would enable a direct link to the Annex I definition of 'aerodrome traffic' which would imply a coverage requirement for the air-ground communication facilities, without being prescriptive about the airspace associated with such operations. **Justification:** Clarity of regulatory requirement. **Proposed Text:** The UK CAA proposes the following amendment to ATS.OR.410(b): "(b)… two-way communications to take place between an AFIS unit and appropriately equipped aircraft operating **as aerodrome traffic**…"	
632	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.410 1.3. Draft decision (PART-ATS) - GM1 ATS.OR.410(a)	18 62	**Paragraph No:** ATS.OR.410, point (b) and GM1 ATS.OR.410(a) **Comment:** ATS.OR.410(b) states that "The ATS provider shall ensure to the practicable extent and as approved by the competent authority, that air–ground communication facilities enable direct, rapid, continuous and static-free two-way communications..." Whilst the UK CAA is broadly content with the transposition of the recommendation in Annex 11, 6.1.2.2 to rule status within the EU Regulatory framework, we are concerned at the inconsistent use of the phrase "direct, rapid, continuous and static-free two-way communications" in OR, AMC and GM. As an example, the phrase appears within ATS.OR.410(b) but is contained as GM to ATS.OR.410(a); no rationale is provided within NPA 2016-09(a) for this inconsistency.	

			We note that there are further similar inconsistencies against other requirements. The UK CAA believes that these inconsistencies need to be resolved, or, that their purpose should be clarified by EASA. **Justification:** Consistency within EU Regulatory materials.	
954	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.420 1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.425	18 18 - 19	**Paragraph No:** ATS.OR.420(a) and ATS.OR.425(a) **Comment:** ATS.OR.420(a) and ATS.OR.425(a) state that "The ATS provider shall ensure that air–ground communication facilities enable…static-free two-way communications …". However, the ATS provider cannot exercise any form of control over the natural environment and the existence of certain sources of static, thus stating that the air-ground communication "shall be static-free", places an impossible requirement upon the ATS provider. Moreover, the wording of ATS.OR.420(a) and ATS.OR.425(a) is inconsistent with other instances of this phrase contained within the ATS.OR where the text is appended with the phrase "to the practicable extent" or similar. Finally, the inclusion of this phrase within ATS.OR.420(a) and ATS.OR.425(a) is inconsistent with its appearance elsewhere within AMC and GM. The UK CAA believes that these inconsistencies need to be resolved, or, that their purpose should be clarified by EASA. **Justification:** Consistency within EU Regulatory materials.	
955	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.435	19 - 21	**Paragraph No:** ATS.OR.435(a)(1)(i) **Comment:** ATS.OR.435(a)(1)(i) could be misinterpreted as meaning that the ATS provider is not required to provide ground-ground communications facilities where the FIC and ACC are co-located. As an example, an FIC and ACC could be co-located at the same facility but could be operating within different operations rooms and thus would require ground-ground communications to permit liaison and coordination. Whilst acknowledging that the risk of misinterpretation originates within the source text (ICAO Annex 11, 6.2.2.1.1), the UK CAA believes that the text requires amendment in order to mitigate this risk. **Justification:** Mitigate the risk of misinterpretation. **Proposed Text:** The UK CAA proposes the following amendment to ATS.OR.435(a)(1)(i): "(i) the area control centre, unless **incorporated**;"	
958	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.450	22	**Paragraph No:** ATS.OR.450, point (a) **Comment:** See also comment by UK CAA on ATS.TR.305, point (c). Given the emphasis that EASA have placed upon the development of AFIS related provisions, the UK CAA believes that a requirement exists to develop an AFIS provision that is equivalent to ATS.OR.450, point (a). Whilst acknowledging that we would not wish to introduce a disproportionate requirement upon aerodrome FIS providers by mandating the provision of two-way radiotelephony communication facilities, it would be appropriate to introduce sufficient flexibility for an aerodrome FIS provider to determine the requirement for such facilities.	

Justification: Enhance safety on the aerodrome manoeuvring area.

Proposed Text: The UK CAA proposes the following additional text which is derived from AMC1 ATS.OR.450, point (a), GM1 ATS.OR.450(a) and the EUROCONTROL Manual of Aerodrome FIS paragraph 4.2.2.3:

ATS.OR.4XX Communications for the management of vehicles other than aircraft on manoeuvring areas at AFIS aerodromes

The ATS provider shall determine the requirements for communications for the management of vehicles on the manoeuvring area at AFIS aerodromes.

AMC1 ATS.OR.4XX Communications for the management of vehicles other than aircraft on manoeuvring areas at AFIS aerodromes

(a) When the ATS provider determines that communications by a system of visual signals is adequate, or in the case of radiotelephony communication failure, the signals hereunder should have the meaning indicated therein:

Light signal from AFIS unit	Meaning
Green flashes	Permission to cross landing area or to move onto taxiway
Steady red	Stop
Red flashes	Move off the landing area or taxiway and watch out for aircraft
White flashes	Vacate manoeuvring area in accordance with local instructions

(b) In emergency conditions, or if the signals in point (a) are not observed, the signal given hereunder should be used for runways or taxiways equipped with a lighting system and should have the meaning indicated therein.

Light signal from AFIS unit	Meaning
Flashing runway or taxiway lights	Vacate the runway and observe the tower for light signal

GM1 to ATS.OR.4XX Communications for the management of vehicles other than aircraft on manoeuvring areas at AFIS aerodromes

When the ATS provider determines that two-way radiotelephony communication facilities are required, all vehicles employed on the manoeuvring area should be capable of maintaining two-way communication with the aerodrome FIS unit, except when the vehicle is only occasionally used on the manoeuvring area and is:

(1) accompanied by a vehicle with the required communications capability; or,

			(2) employed in accordance with a pre-arranged plan established with the aerodrome FIS unit.	
960	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.460	22 - 23	**Paragraph No:** ATS.OR.460, point (a)(1) **Comment:** ATS.OR.460 point (a)(1) refers to the retention of "recordings of communications channels, as specified in ATS.OR.400(b)"; however, the reference is erroneous and should refer the reader to ATS.OR.400 points (c) and (d). **Justification:** Accuracy. **Proposed Text:** The UK CAA proposes the following amended text for ATS.OR.460 point (a)(1): "(1) recordings of communications channels, as specified in **ATS.OR.400(c) and (d)**;"	
961	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.460	22 - 23	**Paragraph No:** ATS.OR.460, point (a)(2) **Comment:** ATS.OR.460 point (a)(2) refers to the retention of "recordings of data and communications, as specified in ATS.OR.435(c)(3), (4) and (5)"; however, the reference is erroneous and should only refer the reader to ATS.OR.435(c)(3) and (5). **Justification:** Accuracy **Proposed Text:** The UK CAA proposes the following amended text for ATS.OR.460(a)(2): "(2) recordings of data and communications, as specified in ATS.OR.435(c)(3) **and (5)**;"	
962	1.1.3. Amendments to Annex IV — Subpart A — Section 4 - ATS.OR.465	23	**Paragraph No:** ATS.OR.465 **Comment:** The Agency is requested to explain the apparent inconsistency between the proposed requirement to retain 'environment recording' for at least the last 24-hours of operation and the proposed requirement (ATS.OR.460) to retain all other recordings of data and communications for at least 30-days. The Agency is also requested to explain the rationale for the different regulatory approach taken with regards to 'environment recording' and other forms of recordings of data and communications. ATS.OR.400(b) and (c), ATS.OR.435(c)(3) and (5), ATS.OR.440(g) and ATS.OR.450 specify the requirements for recording, whilst ATS.OR.460 specifies the requirement for the retention of that data; whereas ATS.OR.465 combines both a requirement for the recording and specifies the requirement for the retention of that data. Notwithstanding the UK CAA's additional comments (submitted against NPA 2016-09 A) on the proposed ATS.OR.465, should this provision continue to be viewed as a requirement, for the purposes of consistency, its retention criteria should be incorporated within ATS.OR.460. **Justification:** Clarification of regulatory intent.	
963	1.1.3. Amendments to Annex IV — Subpart A —	24 - 25	**Paragraph No:** ATS.OR.515, point (f) **Comment:** ATS.OR.515(f) refers to the height of 'cloud base' being	

	Section 5 - ATS.OR.515		assessed by instrumented means; however, the term 'cloud ceiling' is defined within the EU Regulatory framework - the term 'cloud base' is not. The UK CAA requests EASA to clarify the meaning of the term 'cloud base'. **Justification:** Clarity of EU Regulatory materials.	
1261	1.1.3. Amendments to Annex IV — Subpart A — Section 5 - ATS.OR.515	24 - 25	**Paragraph No:** ATS.OR.515(g) **Comment:** ATS.OR.515(g) is inconsistent with MET.OR.235(b). The latter states that "An aerodrome meteorological office shall… prepare wind shear warnings for aerodromes where wind shear is considered a factor…" This implies that some form of assessment is required to be undertaken to determine the requirement for information on wind shear to be provided. The text proposed in ATS.OR.515(g) would obviate the requirement for such an assessment to be made and the UK CAA considers this to place a disproportionate requirement upon ATS providers. **Justification:** Consistency within EU Regulatory materials. **Proposed Text:** The UK CAA proposes that ATS.OR.515(g) is amended to read as follows: "(g) At those aerodromes where wind shear is considered a factor, the ATS provider shall ensure that aerodrome control tower and AFIS units are supplied with information on wind shear which could adversely affect aircraft on the approach or take-off paths or during circling approach, and aircraft on the runway during the landing roll or take-off run."	
967	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.105	27	**Paragraph No:** ATS.TR.105, point (b) **Comment:** See also subsequent comment by UK CAA on ATS.TR.105 point (b). The concept of an air traffic advisory service is not included within the Annex 11 text on Divisions of the ATS but is incorporated within Chapter 9 of PANS-ATM on FIS and Alerting Service. However, the tone and content of the text indicates that an air traffic advisory service is considered by ICAO to be distinct from FIS in that it is provided with the objective of making "information on collision hazards more effective than it would be in the mere provision of flight information service". As such, the UK CAA believes that air traffic advisory service and FIS should be described separately within ATS.TR.105. **Justification:** Clarity of EU Regulatory materials **Proposed Text:** The UK CAA proposes that ATS.TR.105 point (b) is amended to read as follows: "(b) The air traffic advisory service: the provision of an advisory service to IFR flights in advisory airspace, or on advisory routes (class F airspace), in order to accomplish the objectives established in point (d) of ATS.TR.100;"	
968	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.105	27	**Paragraph No:** ATS.TR.105 point (b) **Comment:** A number of proposed provisions within Part-ATS imply that aerodrome FIS is a distinct ATS to be considered alongside ATC service, FIS, air traffic advisory service and alerting service. The UK CAA acknowledges that this was not EASA's intent in drafting Part-	

			ATS. However, we consider that it is important to emphasise that 'Aerodrome FIS' as presented in this NPA is **not** a separate ATS but is FIS provided at an aerodrome. As such, an amendment to ATS.TR.105 and the development of some additional GM would serve to provide this clarity. The UK CAA is not proposing a sub-division of FIS into 'en-route' and 'aerodrome' (as with the sub-division of ATC service) as FIS is provided to all aircraft in receipt of an ATC service. Rather, we believe that it would be beneficial to identify the 3 'operational environments' in which FIS is provided, which should also highlight the importance of information provided by aerodrome FIS providers in preventing collisions involving aircraft on the manoeuvring area. Therefore the UK CAA proposes a new ATS.TR.105 point (c) detailing FIS which incorporates material from ATS.TR.300 and supporting GM derived from EUROCONTROL's Manual of Aerodrome FIS. Should this proposal be accepted, it would render GM2 ATS.TR.105(b) Divisions of the ATS redundant. **Justification:** Clarity and accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to ATS.TR.105 point c which assumes that the UK CAA's proposed amendment to ATS.TR.105(b) has been accepted: "(c) The Flight Information Service (FIS): to accomplish the objective in point (d) of ATS.TR.100, this service being provided as follows: (1) to all aircraft which are likely to be affected by the information and which are provided with ATC service; (2) to en-route traffic in the FIR where ATC service is not required. (3) to aerodrome traffic at those aerodromes where the competent authority determines that the provision of aerodrome control service is not justified, or is not justified on a 24-hour basis." The following GM is proposed: **"GMXX ATS.TR.105(c)(3) Divisions of the ATS** AERODROME FLIGHT INFORMATION SERVICE Aerodrome Flight Information Service is the term used to describe the provision of information useful for the safe and efficient conduct of aerodrome traffic at those aerodromes where the competent authority determines that the provision of aerodrome control service is not justified, or is not justified on a 24-hour basis. As such, the provision of an aerodrome Flight Information Service may, in addition to accomplishing the objective in point (d) of ATS.TR.100, assist in accomplishing the objective in point (b) of ATS.TR.100."	
969	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.110	27	**Paragraph No:** ATS.TR.110, point (a)(3) **Comment:** ATS.TR.110 point (a)(3) states that "Aerodrome flight information service (AFIS) units shall be established to provide flight information service and alerting service at AFIS aerodromes..." However, this appears to be inconsistent with the definition of aerodrome FIS proposed by EASA and with ATS.TR.105 point (b) which states that the purpose of the FIS is to achieve only objective (d) within ATS.TR.100 and thus excludes the provision of an alerting	

			service and the accomplishment of objective (e) of ATS.TR.100. The UK CAA believes that the text presented in ATS.TR.110 point (a)(3) is appropriate with regards to the provision of an alerting service by AFIS units and has proposed consequential amendments to the definition of 'aerodrome FIS' and ATS.TR.105 point b. **Justification:** Consistency of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that the current definition of 'aerodrome FIS' should be retained as follows: 'Aerodrome flight information service (AFIS)' means flight information service and alerting service for aerodrome traffic at an aerodrome provided at an aerodrome by an ATS provider designated in accordance with Article 8(1) of Regulation (EC) No 550/2004; The UK CAA further proposes the following amendment to ATS.TR.105 which assumes that the UK CAA's proposed amendment to ATS.TR.105(b) has been accepted: "(c) The Flight Information Service (FIS): to accomplish the objective in point (d) of ATS.TR.100, this service being provided as follows: (1) to all aircraft which are likely to be affected by the information and which are provided with ATC service; (2) to en-route traffic in the FIR where ATC service is not required. (3) to aerodrome traffic at those aerodromes where the competent authority determines that the provision of aerodrome control service is not justified, or is not justified on a 24-hour basis." The following GM is proposed: **"GMXX ATS.TR.105(c)(3) Divisions of the ATS** AERODROME FLIGHT INFORMATION SERVICE Aerodrome Flight Information Service is the term used to describe the provision of information useful for the safe and efficient conduct of aerodrome traffic at those aerodromes where the competent authority determines that the provision of aerodrome control service is not justified, or is not justified on a 24-hour basis. As such, the provision of an aerodrome Flight Information Service may, in addition to accomplishing the objective in point (d) of ATS.TR.100, assist in accomplishing the objective in point (b) of ATS.TR.100."	
970	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.110	27	**Paragraph No:** ATS.TR.110 point (a)(3) **Comment:** ATS.TR.110 point (a)(3) states that "Aerodrome flight information service (AFIS) units shall be established… within the portion of airspace associated with such aerodromes." The UK CAA believes that the proposed text would benefit from refinement through deletion of the term 'portion'. **Justification:** Refinement of EU Regulatory materials. **Proposed Text:** The UK CAA proposes ATS.TR.110 point (a)(3) is amended to read:	

			"(3) Aerodrome flight information service (AFIS) units shall be established to provide flight information service and alerting service at AFIS aerodromes and within the airspace associated with such aerodromes."	
971	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.115	27 - 28	**Paragraph No:** ATS.TR.115 point (b)(6) **Comment:** ATS.TR.115 point (b)(6) is not consistent with ICAO Annex 10 Vol II 5.2.1.7.1.2 in that it states that a Flight Information Service shall be identified by the use of the RTF callsign 'INFORMATION'. This inconsistency from the source ICAO text could cause confusion amongst flight crews. Whilst acknowledging that the abbreviation 'AFIS' appears in the encode section of ICAO Doc 8400 PANS-ABC, the UK CAA would argue that the abbreviation is not 'generally understood by aeronautical personnel' in accordance with Annex 10 Vol II 5.2.1.6.2.2. The UK CAA believes that, in part, EASA's rationale for this proposal was to better highlight to flight crews the different nature of the ATS being provided. However, this points to a lack of knowledge and understanding by flight crews which should be addressed through improved training, examination and assessment, rather than through the introduction of a difference to ICAO which is unlikely to achieve EASA's proposed outcome. Finally, the use of a callsign that is unique to the provision of aerodrome FIS appears to try to establish it as an ATS that is separate from FIS (see UK CAA comments on the proposed amendment to the definition of aerodrome FIS and ATS.TR.105 point (b)). The UK CAA does not support the proposal to introduce "AFIS" as the RTF callsign for aerodrome FIS units. See also additional UK CAA comment on ATS.TR.115(b) **Justification:** Consistency of EU Regulatory materials with source ICAO text.	
973	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.115	27 - 28	**Paragraph No:** ATS.TR.115 point (b) **Comment:** EASA have not completely transposed ICAO Annex 10 Vol II 5.2.1.7.1.2 in that the following names of unit or service available have been omitted: ARRIVAL DEPARTURE RADAR PRECISION HOMER DELIVERY APRON DISPATCH RADIO Of particular concern is the omission of the RTF callsigns 'ARRIVAL', 'DEPARTURE' and 'RADAR' which can assist pilots in differentiating between surveillance and non-surveillance environments. This is particularly useful in uncontrolled airspace when in receipt of a FIS and being able to determine whether or not the FIS is supplemented by surveillance based information. Knowing the ATS environment in which the pilot is operating can affect their decision making process on the conduct of their flight. No rationale has been provided for this incomplete transposition. Whilst acknowledging that the RTF callsigns "PRECISION" and "HOMER" may not be required within the EU Regulatory framework, the UK CAA wish to propose that EASA transpose additional elements of the content of ICAO Annex 10 Vol II	

			5.2.1.7.1.2. See also UK CAA comment on GM1 ATS.TR.115(b). **Justification:** Incomplete transposition of source ICAO text. **Proposed Text:** The UK CAA proposes that ATS.TR.115 point (b) is amended to read as follows: (b) The name of the ATS units shall be complemented by one of the following, as appropriate: (1) area control centre — CONTROL; (2) approach control — APPROACH; (3) approach control radar arrivals — ARRIVAL; (4) approach control radar departures – DEPARTURE; (5) aerodrome control — TOWER; (6) surface movement control — GROUND; (7) radar (in general) – RADAR; (8) flight information service — INFORMATION; (9) clearance delivery – DELIVERY; (10) apron control – APRON; (11) company dispatch – DISPATCH; and (12) aeronautical station – RADIO.	
974	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.135	29	**Paragraph No:** ATS.TR.135 point (b) **Comment:** ATS.TR.135 point (b) states that “The transition level shall be located at least 300 m (1 000 ft) above the transition altitude to permit the transition altitude and the transition level to be used concurrently in cruising flight, with vertical separation ensured.” As such, ATS.TR.135 is related to ATS.TR.210 point (c)(1) regarding the vertical separation minimum of a “nominal 300 m (1 000 ft)”. Consequently, for the purposes of consistency, ATS.TR.135 point (b) should be amended to reflect the ‘nominal’ nature of the 300 m (1 000 ft) which is to be established between the transition altitude and the transition level. There are additional detailed, technical arguments related to the importance of the inclusion of the term ‘nominal’ which the UK CAA would be pleased to present separately to the Agency but which were not considered appropriate to be included within our consultation response. **Justification:** Consistency of EU Regulatory materials with source ICAO text and flexibility of application in all ATS environments. **Proposed Text:** The UK CAA proposes the following amendment to ATS.TR.135 point (b): “(b) The transition level shall be located, at a **nominal, at least** 300 m (1 000 ft) above the transition altitude to permit the transition altitude and the transition level to be used concurrently in cruising flight, with vertical separation ensured.”	
976	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.140	29	**Paragraph No:** ATS.TR.140, point (b)(1) **Comment:** ATS.TR.140(a) precludes the possibility that Member States may not establish minimum flight altitudes; or could imply a requirement for Member States to establish minimum flight altitudes when there is no perceivable safety benefit in doing so. However, this is addressed in the original PANS-ATM text (4.10.3.2) which states that “ATC units shall, *when circumstances warrant it*, determine the lowest usable flight level or levels for the whole or parts of the control area for which they are responsible, use it when assigning flight levels and pass it to pilots on request.” The italicised	

			text above has not been transposed into ATS.TR.140 point (b)(1) which may cause a safety issue where Member States do not establish minimum flight altitudes. The UK CAA strongly advocates the transposition of the source ICAO text without amendment. **Justification:** Incomplete transposition of source ICAO text without justification.	
977	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.145	29 - 30	**Paragraph No:** ATS.TR.145 point (d) **Comment:** ATS.TR.145(d) states that "A QNH altimeter setting shall be included in the descent clearance when first cleared -**at** an altitude below the transition level". The UK CAA believes that the inclusion of the word 'at' is a typographical error. Moreover, ATS.TR.145 point (d) goes on to state "…in approach clearances or clearances to enter the traffic circuit, *and in taxi clearances for departing aircraft except when it is known that the aircraft has already received the information in a directed transmission.*" The UK CAA believes that the italicised text could be misinterpreted as a condition ("except when it is known that…") that is able to be applied to all instances where a QNH altimeter setting is passed to an aircraft. However, the condition only applies to "taxi clearances for departing aircraft." Whilst acknowledging that the text presented in ATS.TR.145 point (d) is transposed directly from PANS-ATM 4.10.4.5 – which thus poses the same possibility of misinterpretation – the UK CAA proposes that this is an opportunity to resolve this safety issue. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that ATS.TR.145 point (d) is amended to read as follows: "(d) A QNH altimeter setting shall be included in the descent clearance when first cleared to an altitude below the transition level, in approach clearances or clearances to enter the traffic circuit, and, except when it is known that the aircraft has already received the information in a directed transmission, in taxi clearances for departing aircraft."	
979	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.160	30 - 31	**Paragraph No:** ATS.TR.160 point (b)(3) **Comment:** The use of the term "in possession" in ATS.TR.160 point (b)(3) suggests a level of cognitive processing, awareness and understanding on the part of the controller which cannot be assured by the ATS provider. Consequently, it would be more appropriate to state that controllers were "at all times provided with full and up-to-date information." Whilst acknowledging that the text is transposed directly from PANS-ATM text 8.6.8.1, the UK CAA proposes that this is an opportunity to resolve the inappropriate utilisation of this verb. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes ATS.TR.160 point (b)(3) is amended to read: "(3) controllers are at all times provided with full and up-to-date information regarding:"	
981	1.1.4.	30 -		

	Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.160	31	**Paragraph No:** ATS.TR.160 point (b)(3)(i) and (iii) **Comment:** In using the phrase "**the** necessary temperature correction", in ATS.TR.160 points (b)(3)(i) and (iii), incorrectly pre-supposes that a temperature correction is necessary. It would be more appropriate for ATS.TR.160 points (b)(3)(i) and (iii) to refer to "**any** necessary temperature correction". Furthermore, no AMC or GM has been provided within the NPA on a methodology to determine any necessary temperature correction to be applied by controllers. EASA is invited to provide clarification on the methodology to be used by ATS providers to determine any necessary temperature correction. If it is not possible to provide such clarification, EASA is invited to indicate whether they have any intention to develop such methodology. **Justification:** Accuracy and completeness of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to ATS.TR.160 points (b)(3)(i) and (iii): "(i) established minimum flight altitudes within the area of responsibility, including **any** necessary temperature correction; ... (iii) established minimum altitudes applicable to procedures based on tactical vectoring, including **any** necessary temperature correction."	
983	1.1.4. Amendments to Annex IV — Subpart B — Section 1 - ATS.TR.160	30 - 31	**Paragraph No:** ATS.TR.160 point (e) **Comment:** Section 1 is related to the general provision of ATS; however, ATS.TR.160 point (e) relates specifically to the provision of an ATC service based on ATS surveillance. Set alongside ATS.TR.160 points (a) to (d), point (e) appears incongruous. Moreover, GM to this provision (GM1 ATS.TR.160(e)) relates to the provision of a FIS based on ATS surveillance. Where this text has been transposed from PANS-ATM into SERA.7002, given that the purpose of SERA is to provide a rule-set to pilots, it is appropriate to provide both pieces of text within the same rule to inform pilots' expectations on the provision of traffic avoidance. However, the purpose of Part-ATS is to provide a rule-set for ATS providers and as such, how traffic avoidance is effected in uncontrolled and controlled airspace is of equal importance. Consequently, the UK CAA is of the view that it is more appropriate to associate the text from GM1 ATS.TR.160(e) as AMC to ATS.TR.305(b)(2)) and for ATS.TR.160(e) to be deleted and placed as a new provision within Section 2. See also later comment on GM1 ATS.TR.160(e) by UK CAA. **Justification:** Consistency and accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that ATS.TR.160(e) be deleted and inserted as a new provision within section 2 as detailed below. The UK CAA further proposes that GM1 ATS.TR.160(e) should be deleted and, following minor amendment, be inserted as AMC to ATS.TR.305(b)(2): **"ATS.TR.2XX Collision Hazard Information Based on ATS Surveillance** When an identified controlled flight is observed to be on a conflicting path with an unknown aircraft, deemed to constitute a collision hazard, the pilot of the controlled flight shall, whenever practicable:	

			(1) be informed of the unknown aircraft, and, if the pilot so requests or if the situation so warrants in the opinion of the controller, avoiding action shall be suggested; and (2) be notified when the conflict no longer exists." **"AMCXX ATS.TR.305(b)(2) Collision Hazard Information Based on ATS Surveillance** When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should: (1) be informed of the conflicting aircraft and, if the pilot requests or if, in the opinion of the controller/FIS officer, the situation warrants, traffic avoidance advice should be suggested; and (2) be notified when the conflict no longer exists."	
985	1.1.4. Amendments to Annex IV — Subpart B — Section 2 - ATS.TR.200	32	**Paragraph No: ATS.TR.200** **Comment:** At present, the UK permits elements of an ATC service to be provided outside controlled airspace by air traffic controllers. Historically, the UK's stance has been that the requirement for controlled airspace was required to be proven based on the nature of the operation and its associated risks. This stance was supported by the UK's codification of ICAO FIS requirements through the development and application of ATS outside controlled airspace and the performance-based safety oversight by the competent authority. Consequently, from the UK's perspective, Part-ATS represents a paradigm-shift in ATS provision and the application of the airspace classification system. The UK CAA supports the principle that ATC service is provided by air traffic controllers within controlled airspace and aspires to move towards this position. However, implementation of these provisions represents a significant challenge – specifically in terms of our operations within uncontrolled airspace – which we believe will require considerable time to bring to a conclusion. The UK CAA assesses that this implementation period will extend well beyond the traditional timescales applied by EASA and the Commission for transitional arrangements, given the need to address and mitigate structural, procedural and resource impacts. As such, the UK CAA seeks to engage further with the Agency and the Commission to determine how that transition can be safely managed. **Justification:** UK implementation of Part-ATS proposals concerning the provision of air traffic services in uncontrolled airspace represents a significant challenge which the UK CAA believes will require considerable State, Competent Authority and industry resource to bring to a conclusion. The impacts and potential ways forward cannot yet be definitively identified nor costed; however the cost impacts are currently considered to be considerable. Transition must be undertaken in a safe and efficient manner and cannot be undertaken in haste; hence the UK CAA's firm belief that an extended transition period is required in this regard.	
988	1.1.4. Amendments to Annex IV — Subpart B — Section 2 -	40 - 41	**Paragraph No:** ATS.TR.260 point (e) **Comment:** ATS.TR.260 point (e) refers to 'air traffic conditions' but it is not clear as to what this term means and its inclusion is not consistent with the source ICAO PANS-ATM text (7.2.2). Traffic	

	ATS.TR.260		complexity, task complexity, traffic density, airspace density and/or complexity, airspace classification considerations are all factors that could be interpreted as forming part of 'air traffic conditions'. Whilst the UK CAA can see the benefit of including 'air traffic conditions' as one of the considerations in runway selection, we believe that EASA should provide GM to better explain what is meant by this term. **Justification:** Clarity and completeness of EU Regulatory materials.	
991	1.1.4. Amendments to Annex IV — Subpart B — Section 3 - ATS.TR.305	42 - 43	**Paragraph No:** ATS.TR.305 points (b) and (c) **Comment:** ATS.TR.305 point (c)(3) includes a provision permitting aerodrome FIS to include "the provision of information concerning… messages, including clearances, received from other ATS units to relay to aircraft", whereas this is not incorporated within point (b). The UK CAA believes that this provision should be extended to all FIS providers who may be required to relay messages and particularly clearances from other ATS units and thus be incorporated within ATS.TR.305 point (b). **Justification:** The effect of not extending ATS.TR.305 point (c)(3) to all FIS providers could be to increase the workload of controllers at ACCs and the associated RTF occupancy. As an example, FIS officers at FICs can currently negotiate an airways joining clearance through ground-ground communications (either voice-communications or data link) on behalf of aircraft receiving a FIS in uncontrolled airspace. If the scope of ATS.TR.305 point (b) is not extended, these aircraft would be required to contact the ACC sector directly on the ATS frequency in use to negotiate an airways joining clearance, leading to increased controller workload and RTF occupancy. **Proposed Text:** The UK CAA proposes that ATS.TR.305 points (b) and (c) are amended to read as follows: "(b) Flight information service provided to flights shall include, in addition to that outlined in point (a), the provision of information concerning: (1) weather conditions reported or forecast at departure, destination and alternate aerodromes; (2) collision hazards, to aircraft operating in airspace Classes C, D, E, F and G; (3) for flight over water areas, in so far as practicable and when requested by a pilot, any available information such as radio call sign, position, true track, speed, etc., of surface vessels in the area. (4) messages, including clearances, received from other ATS units to relay to aircraft." "(c) AFIS provided to flights shall include, in addition to relevant items outlined in points (a) and (b), the provision of information concerning: (1) collision hazards to aircraft and vehicles operating on the manoeuvring area; (2) the runway in use;"	
994	1.1.4. Amendments to Annex IV — Subpart B —	42 - 43	**Paragraph No:** ATS.TR.305 point (c)(1) **Comment:** The UK CAA's comments on ATS.TR.305(c) should be	

	Section 3 - ATS.TR.305		read in conjunction with our response to the consultation question posed by EASA in NPA 2016-09(a). In relation to the provision of information to flights on the manoeuvring area, ATS.TR.305(c) point (1) is aligned with the principle detailed in Circular 211. Specifically, that information is provided to pilots in order for them to "decide on the course of action to be taken to ensure separation from other aircraft, ground vehicles and obstacles." However, Circular 211 does not include guidance on the management of the aerodrome operating environment and the movement of persons and/or vehicles on the manoeuvring area. This omission is addressed within paragraph 4.2.2.1 of EUROCONTROL's Manual of Aerodrome FIS. The UK CAA considers it noteworthy that EASA acknowledge in NPA 2016-09(a) that the EUROCONTROL Manual resulted from "an extensive consultation process" with "affected European stakeholders" but then appear to contradict this by not incorporating within Part-ATS at least the flexibility to utilise these provisions. The UK CAA considers that the ability to manage the aerodrome operating environment, by requiring the movement of persons and vehicles on the manoeuvring area to be authorised by the aerodrome FIS unit, is critical to the maintenance of safety at AFIS aerodromes. Active management of the aerodrome operating environment permits the aerodrome FIS officer to provide the pilot with detailed information, enhancing the pilot's ability to discharge their responsibilities with regards to the avoidance of collisions. As such, the UK CAA proposes additional AMC and GM to ATS.TR.305(c) point (1) which would enable competent authorities to specify measures which would reflect the intent of paragraph 4.2.2.1 of EUROCONTROL's Manual of Aerodrome FIS. **Justification:** The UK CAA considers that the risk of a ground collision accident is significantly increased by the ability of persons and vehicles to gain unauthorised access to the manoeuvring area. **Proposed Text:** The UK CAA proposes the following AMC and GM to ATS.TR.305(c) point (1): **"AMC1 ATS.TR.305(c)(1) Scope of flight information service** ENTRY TO THE MANOEUVRING AREA – GROUND VEHICLES AND PERSONS Where specified by the competent authority, the movement of persons or vehicles including towed aircraft on the manoeuvring area should be subject to authorisation by the AFIS unit." **"GM1 to AMC1 ATS.TR.305(c)(1) Scope of flight information service** ENTRY TO THE MANOEUVRING AREA – GROUND VEHICLES AND PERSONS Persons, including drivers of all vehicles, should be required to obtain authorisation from the AFIS unit before entry to the manoeuvring area. Notwithstanding such an authorisation, entry to a runway or runway strip or change in the operation authorized should be subject to a further specific authorisation by the AFIS unit."	
999	1.1.4. Amendments to Annex IV — Subpart B — Section 3 - ATS.TR.305	42 - 43	**Paragraph No:** ATS.TR.305(c) point (1) **Comment:** Through the Air Navigation Order 2016, in specific circumstances, the UK permits aerodrome FIS officers to pass instructions to aircraft on the apron and manoeuvring area. These	

circumstances are specified in the manual of ATS provided by the UK CAA to aerodrome FIS providers, complemented by local instructions and safety assurance activities and approved and overseen by the competent authority through the ANSP certification/designation processes. EASA state in NPA 2016-09(a) that "the authority given to aerodrome FIS units to issue instructions…to aircraft on the ground… is neither compliant with the FIS principles and requirements established in Annex 11, nor with Article 3(1) of Regulation (EU) 2015/340". However, the UK CAA strongly believes that the removal of such authority would pose a significant safety concern and as such, we would not support such a retrograde step.

The Agency argues in NPA 2016-09(a) that it reviewed 234 occurrence reports for events reported at 22 aerodromes where aerodrome FIS is provided over a 5 year period. One of the conclusions reached by the Agency was that the most frequent type of occurrence reported at those AFIS aerodromes were near collisions and runway incursions. However, EASA's analysis did not detail:

· whether the role of the aerodrome FIS officer was causal or contributory to these incidents;
· the involvement of aircraft, persons and vehicles in the incident;
· whether FIS officers at these aerodromes were permitted to pass any form of instruction to aircraft, persons or vehicles.

Furthermore, whilst EASA acknowledge that their own "safety risk analysis shows that there is no impelling safety driver to regulate AFIS", they state their belief that "several occurrences are linked indirectly or directly to the current AFIS requirements" and that "harmonisation may have helped in some circumstances." However, the Agency provides no detail on how these occurrences were linked to the current AFIS requirements; whether the 'current AFIS requirements' referred to are those contained within ICAO Circular 211, EUROCONTROL's Manual of Aerodrome FIS or national requirements; or how harmonisation of such requirements may have been able to mitigate the severity or likelihood of these occurrences. Consequently, We believe that EASA's analysis as presented is incomplete and does not provide a sufficient basis of evidence upon which to draw conclusions.

The UK CAA has undertaken its own analysis of near collision and runway incursion occurrences at AFIS aerodromes during the period from 1 October 2006 to 30 September 2016. During this period, 58 collision related events and 218 runway incursion events were recorded; none were caused by or contributed to by aerodrome FIS officers. In a significant majority of the 218 recorded runway incursion events, the actions of the aerodrome FIS officer, utilising their authority to issue instructions to aircraft on the manoeuvring area, prevented a more serious incident from occurring. As such, the UK has a clear safety argument supporting the permission given to an aerodrome FIS officer to issue instructions to aircraft on the manoeuvring area, based upon the need to mitigate:

· the complexity of traffic patterns at many AFIS aerodromes resulting, typically, from the aerodrome having been designed and built for military purposes in the 1940s and then being passed into civil ownership some years later.
· the risk of ground collision associated with pilot human error and limited cockpit visibility on the ground.

			The UK CAA acknowledges that alternative mitigations exist to address these safety risks; for example, through the provision of ATC service, management of the type and volume of activity undertaken at the aerodrome and through adaptation of the physical aerodrome environment. However, the UK CAA believes that such measures would either be disproportionate or would pose a significant economic disbenefit to industry. It should be borne in mind that the UK has established a competitive environment for the provision of ATM/ANS. In regards to those aerodromes within the UK where aerodrome FIS is currently provided, ATC service is not considered to be required to manage airborne aerodrome traffic; only the provision of instructions to aerodrome traffic on the manoeuvring area. However, at present, within the bounds of EASA's statement in NPA 2016-09(a), the provision of such a level of service would require an individual to have completed the 'common core content' and to have an 'Aerodrome Control Visual' or 'Aerodrome Control Instrument' rating with the associated endorsements. A requirement to gain such a licence would be disproportionate and would pose a significant financial disbenefit to the ATS provider. The UK CAA also consider it noteworthy that the licensing of FIS officers is considered outside the scope of the Basic Regulation by the Commission and has thus been confirmed as remaining an area of national competency.7 However, these technical provisions have an implicit impact upon this competency. By constraining the scope of aerodrome FIS, EASA have proposed provisions which conflict with and contradict national licensing policy. In regards to those mitigations which would seek to manage the type and volume of activity undertaken at an AFIS aerodrome, or adapt the physical aerodrome environment, either course of action could have a negative effect on the ability of the aerodrome to generate revenue, whilst the latter would have direct cost implications. Given the competitive environment in which ATM/ANS are provided within the UK, any course of action which leads UK ANSPs to face increased costs or a reduction in their ability to generate revenue would be seen as a significant concern to the UK CAA. Notwithstanding the UK CAA's additional comments on the questions posed by EASA in NPA 2016-09(a), we wish to engage with the Commission and EASA to jointly explore options to develop EU Regulatory materials and national licensing policy to permit the authority vested in UK aerodrome FIS officers to continue. **Justification:** Maintain level of aerodrome safety at UK AFIS aerodromes.	
1004	1.1.4. Amendments to Annex IV — Subpart B — Section 3 - ATS.TR.305	42 - 43	**Paragraph No:** ATS.TR.305 point (c)(2) **Comment:** The UK CAA wishes to highlight their strong support for the current wording of ATS.TR.305 point (c)(2) and the associated GM1. However, we are concerned by our perception of an inconsistency between the provision and comments from EASA in NPA 2016-09(a) that "in no circumstances are [AFIS units] authorised to undertake actions related to the provision of ATC, such as…selecting the runway to be used for take-off and landing at the aerodrome, which should remain a prerogative of the pilots." As such, the UK CAA requests EASA to clarify that ATS.TR.305 point (c)(2) and the associated GM1 are drafted correctly. Notwithstanding	

			the UK CAA's later comments specifically related to the wording of GM1 ATS.TR.305(c)(2), we would not wish to see any further fundamental amendment to the provisions as drafted within NPA 2016-09(b). **Justification:** UK CAA seeks clarification from EASA on a perceived inconsistency between comments made by the Agency in NPA 2016-09(a) and the provisions drafted within NPA 2016-09(b).	
1010	1.1.4. Amendments to Annex IV — Subpart B — Section 4 - ATS.TR.415 1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.415	48 188	**Paragraph No:** ATS.TR.415 and AMC1 ATS.TR.415 **Comment:** The UK CAA perceives that there is an inconsistency between the text of ATS.TR.415 and its associated AMC. ATS.TR.415 describes that "…the ATS unit(s) aware of the emergency shall plot the flight of the aircraft involved on a chart or other appropriate tool", whereas the associated AMC states that "The progress of an aircraft in emergency should be monitored and (whenever possible) plotted on the situation display…" As such, AMC1 does not illustrate a means of compliance with ATS.TR.415 as the 2 bodies of text relate to different forms in which plotting may take place. UK CAA requests EASA to clarify how ATS units are to "plot the flight of the aircraft involved on a chart". See also UK CAA comment on AMC1 ATS.TR.160(d)(7) relating to the plotting of aircraft positions. **Justification:** Clarity of EU regulatory materials.	
1021	1.3. Draft decision (PART-ATS) - GM2 to Article 3(1b)(a)	52 - 53	**Paragraph No:** GM2 to Article 3(1b)(a) Determination of the need for ATS **Comment:** The second sentence contains a typographical error – "Such UNICOM stations may be established in **an** airspace where Member States have decided that flight information service will be provided, but there is no requirement for mandatory two-way radio communication." **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** UK CAA proposes that GM2 Article 3(1b)(a) is amended to read: "Such UNICOM stations may be established in airspace where Member States have decided that flight information service will be provided, but there is no requirement for mandatory two-way radio communication."	
1024	1.3. Draft decision (PART-ATS) - GM1 to the definition of 'decision altitude'	54	**Paragraph No:** GM1 to the definition of 'decision altitude'. **Comment:** The title of GM1 to the definition of 'decision altitude' is incorrect in that the definition of 'decision altitude' proposed is, in reality, the definition of both 'decision altitude' and 'decision height'. Consequently, the title of the associated GM needs to be amended to reflect its true association. **Justification:** Accuracy of EU regulatory materials. **Proposed Text:** UK CAA proposes that the tile of 'GM1 to the definition of 'decision altitude' is amended to read as follows:: "**GM1 to the definition of 'decision altitude' (DA) or 'decision height' (DH)**"	

1026	1.3. Draft decision (PART-ATS) - AMC6 ATS.OR.110	56	**Paragraph No:** AMC6 ATS.OR.110 **Comment:** AMC6 ATS.OR.110 refers to an AFIS officer and thus infers that an AFIS officer is distinct from a FIS officer. Regulation (EU) 2015/340 draws no distinctions between licensed air traffic controllers; it is the ratings issued to the controller that distinguishes the controlling discipline in which they operate. In the same way, whilst cognisant that equivalent rulemaking activity on the licensing of FIS officers has not yet taken place, it is reasonable to argue that an individual providing a FIS is a FIS officer, irrespective of the discipline in which they operate; be that aerodrome or 'en-route'. Consequently, the UK CAA sees no need to draw a distinction between a FISO and an aerodrome FISO by applying a separate title to them. UK CAA requests that EASA amend all references to 'AFIS officer' made within Part-ATS to either FIS officer, or, where provisions apply solely to the aerodrome context, 'aerodrome FIS officer'. **Justification:** Consistency of EU Regulatory materials.	
1028	1.3. Draft decision (PART-ATS) - GM3 ATS.OR.125(a)	57	**Paragraph No:** GM3 ATS.OR.125(a) **Comment:** The opening sentence in GM3 ATS.OR.125(a) states that "The arrangements established as outlined in GM2 to Article 3(1b)…" However, the UK CAA believes the reference to be incorrect and that it should refer to GM2 to Article 3(1b)(a) relating to UNICOM. **Justification:** Accuracy **Proposed Text:** The UK CAA proposes the following amendment to GM3 ATS.OR.125(a): "The arrangements established as outlined in GM2 to Article 3(1b)**(a)**…"	
1030	1.3. Draft decision (PART-ATS) - GM2 ATS.OR.135	57 - 59	**Paragraph No:** GM2 to ATS.OR.135 **Comment:** Whilst ATS.OR.135 relates to all ATS providers, GM 2 is only applicable to ATC service providers. Whilst cognisant that the proposed text remains true to the source ICAO material, the UK CAA believes that some of the detail may be useful to providers of FIS. Consequently, the UK CAA requests that EASA develop text on contingency arrangements for providers of FIS. **Justification:** Clarity of guidance to providers of FIS.	
1032	1.3. Draft decision (PART-ATS) - GM4 ATS.OR.135	59 - 60	**Paragraph No:** GM4 ATS.OR.135 **Comment:** GM4 ATS.OR.135 Contingency arrangements provides a reference to a EUROCONTROL document as the source of the GM. The UK CAA requests EASA to confirm that they have received guarantees from EUROCONTROL that the document will continue to be maintained. Moreover, the GM contains a hyperlink to a EUROCONTROL document. The UK CAA is concerned that the target content of hyperlinks is liable to amendment and that, therefore, the accuracy of the regulatory material itself may be prejudiced. The UK CAA proposes that the hyperlink is deleted and only a reference made to the EUROCONTROL document. **Justification:** Consistency and accuracy of EU Regulatory materials.	

1033	1.3. Draft decision (PART-ATS) - AMC1 ATS.OR.145(a)	60	**Paragraph No:** AMC1 ATS.OR.145(a) **Comment:** Given that Part-ATS provides for the utilisation of an ATS surveillance system by FIS officers, much of the content of AMC1 ATS.OR.145(a) is applicable not just to the provision of ATC service but also to FIS. However, no similar provisions exist to regulate the provision of FIS using an ATS surveillance system. The UK CAA proposes that EASA develop bespoke regulatory material for providers of FIS, where such provision is supplemented by the use of an ATS surveillance system. **Justification:** Consistency and harmonisation of ATS provision amongst Member States and clarity of EU Regulatory intent for providers of FIS.	
1034	1.3. Draft decision (PART-ATS) - GM1 ATS.OR.145(a)	60	**Paragraph No:** GM1 ATS.OR.145(a) **Comment:** GM1 ATS.OR.145(a) states that “Human Factors principles should be considered when establishing the provisions and procedures stipulated in ATS.TR.145(a)”; however, it provides no further guidance on this matter to detail these principles, nor in which way they should be considered. PANS-ATM includes a number of notes which refer to a variety of guidance documents on Human Factors, for example 13.4.1.3 Note 2 which states that “*Guidance material on Human Factors principles can be found in the* Human Factors Training Manual *(Doc 9683),* Human Factors Digest No. 8 — Human Factors in Air Traffic Control *(Circular 241)*, *and* Human Factors Digest No. 11 — Human Factors in CNS/ATM Systems *(Circular 249).* Whilst acknowledging the age of these publications, the absence of any detailed guidance on the Human Factors principles referred to in GM1 ATS.OR.145(a) weakens the value of the GM itself. In other areas of Part-ATS there are GM which refer the reader to specific documents which can be utilised to access specific information. The UK CAA proposes that EASA should identify more recent documents relating to Human Factors principles which could be referred to within the GM. **Justification:** Ensuring the value of EU regulatory materials.	
1035	1.3. Draft decision (PART-ATS) - GM1 ATS.OR.150(a)	61	**Paragraph No:** GM1 ATS.OR.150(a) **Comment:** GM1 ATS.OR.150(a) provides a reference to a EUROCONTROL document as the source of the GM. The UK CAA requests EASA to confirm that they have received guarantees from EUROCONTROL that the document will continue to be maintained. Moreover, the GM contains a hyperlink to a EUROCONTROL document. The UK CAA is concerned that the target content of hyperlinks is liable to amendment and that, therefore, the accuracy of the regulatory material itself may be prejudiced. The UK CAA proposes that the hyperlink is deleted and only a reference made to the EUROCONTROL document. **Justification:** Consistency and accuracy of EU Regulatory materials.	
1045	1.3. Draft decision (PART-ATS) - AMC1 ATS.OR.400(a)	62	**Paragraph No:** AMC1 ATS.OR.400(a) **Comment:** AMC1 ATS.OR.400(a) states that “Direct pilot-controller communications should be established prior to the provision of ATS surveillance services…”; however, the UK CAA believes that this text is equally applicable to the provision of FIS by FIS officers. See also subsequent comment on AMC1 ATS.OR.400(a).	

			Justification: Consistency and harmonisation of ATS provision amongst Member States and clarity of EU Regulatory intent for providers of FIS. **Proposed Text:** The UK CAA proposes the following amendment to AMC 1 ATS.OR.400(a): "Direct, two-way pilot-controller**/FIS officer** communications should be established prior to the provision of ATS surveillance services…"	
1047	1.3. Draft decision (PART-ATS) - AMC1 ATS.OR.400(a)	62	**Paragraph No:** AMC1 ATS.OR.400(a) **Comment:** AMC1 ATS.OR.400(a) states that "Direct pilot-controller communications should be established prior to the provision of ATS surveillance services…". The term 'established' is inconsistent with other references within EU Regulatory materials to the establishment of pilot-controller/FIS officer communications. A precedent is set within, for example, SERA.8015 and SERA.8035, where the phrase ''establish two-way communications' is utilised. Moreover, establishing communications between a pilot and a controller/FIS officer for the purposes of the provision of ATS surveillance services requires 'two-way communications'. AMC1 ATS.OR.400(a) could be misinterpreted as meaning that 'two-way communications' are not required. Acknowledging that this inconsistent use of terminology is contained within the source ICAO text, the UK CAA believes that EASA should seek to resolve such inconsistencies in order to successfully transpose these provisions into the EU Regulatory framework. **Justification:** Clarity and consistency **Proposed Text:** The UK CAA proposes the following amendment to AMC 1 ATS.OR.400(a): "Direct, **two-way** pilot-controller/FIS officer communications should be established prior to the provision of ATS surveillance services…"	
1050	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.105(b)	65	**Paragraph No:** AMC1 ATS.TR.105(b), point (a) **Comment:** In transposing the original PANS-ATM text (9.1.4.1.1), EASA have not correctly transposed its intent. PANS-ATM states that "The objective of the air traffic advisory service is to make information on collision hazards more effective than it would be in the mere provision of flight information service". However, by using the word "may" in the transposed text, it suggests that the objective of the air traffic advisory service is optional; this is not the case. It is the provision of an air traffic advisory service which is optional. **Justification:** Accuracy of EU Regulatory materials **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.105(b), point (a): "(a) The air traffic advisory service within airspace class F **is** provided with the objective of making information on collision hazards more effective than it would be in the mere provision of flight information service."	
1053	1.3. Draft decision (PART-ATS) - GM2 ATS.TR.105(b)	66	**Paragraph No:** GM2 ATS.TR.105(b) **Comment:** Notwithstanding the UK CAA's comments and proposals in relation to ATS.TR.105(b), the text of GM2 excludes the provision	

			of a FIS alongside an ATC service and is thus inconsistent with ATS.TR.300(a)(1). Should EASA determine not to adopt the UK CAA's proposal in relation to ATS.TR.105(b), EASA should amend GM2 ATS.TR.105(b) to include a reference to the provision of FIS alongside ATC service as detailed in ATS.TR.300(a)(1). Moreover, the wording of GM2 reinforces the UK CAA's perception that Part-ATS appears to define aerodrome FIS as a separate FIS. Finally, the text of GM2 includes two typographical errors; specifically, "Flight information service includes flight information service provided for the en-route traffic in the FIR and AFIS provided to the aerodrome traffic at specified aerodromes." **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** Should EASA determine not to adopt the UK CAA's proposal in relation to ATS.TR.105(b), the UK CAA proposes that GM2 ATS.TR.105(b) is amended to read as follows: "Flight information service includes flight information service provided to all aircraft provided with ATC service, flight information service provided to en-route traffic in the FIR and flight information service provided to aerodrome traffic at specified aerodromes."	
1109	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.115	67	**Paragraph No:** GM1 ATS.TR.115, point (b) **Comment:** GM1 ATS.TR.115 point (b) states that "the name of the aeronautical station should be complemented by the suffix 'UNICOM'". However, this is inconsistent with ICAO Annex 10 Vol II 5.2.1.7.1.2 which states that an aeronautical station not involved in the provision of an ATS, clearance delivery, apron control or company dispatch shall use the RTF callsign 'RADIO'. The UK CAA acknowledges the development of the concept of 'UNICOM' within the European context but proposes that, in order to maintain the greatest consistency with ICAO, the Annex 10 Vol II RTF callsign "RADIO" should be used, rather than create a bespoke European difference. Particularly given that the assignation of the RTF callsign 'UNICOM' may cause flight crews to consider that the European 'UNICOM' concept was identical to that used in the USA. **Justification:** Consistency of EU Regulatory materials with source ICAO text. **Proposed Text:** The UK CAA proposes the following amendment to GM1 ATS.TR.115 point (b): "(b) the name of the aeronautical station should be complemented by the suffix **'RADIO'**."	
1110	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.140(b)	67	**Paragraph No:** GM1 ATS.TR.140(b) **Comment:** The original text from Note 1 to PANS-ATM 4.10.3.2 states that "*Unless otherwise prescribed by the State concerned,* the lowest usable flight level is that flight level which corresponds to, or is immediately above, the established minimum flight altitude." The preamble text in italics is key to this sentence as, without it, GM1 ATS.TR.140(b) is incorrect for those States with a raised transition altitude that is defined for ATM/Airspace management purposes, rather than due to terrain. In order to be correct, the original PANS-ATM text should be fully transposed. **Justification:** Accuracy of EU Regulatory materials.	

			Proposed Text: The UK CAA proposes that GM1 ATS.TR.140(b) is amended to read as follows: "Unless otherwise prescribed by the competent authority, the lowest usable flight level is that flight level which corresponds to, or is immediately above, the established minimum flight altitude."	
1112	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.160	70	**Paragraph No:** GM1 ATS.TR.160 **Comment:** GM1 ATS.TR.160 implies that safety nets such as conflict alert and minimum safe altitude warning can improve capacity and efficiency of the ATC service. However, the ATS surveillance service is "provided directly by means of an ATS surveillance system" which definition does not include safety nets. Whilst acknowledging that the text is transposed directly from PANS-ATM 8.4.1, the UK CAA proposes that the text presented is erroneous. Moreover, given the content of ATS.TR.160, the GM itself appears superfluous, although the UK CAA acknowledges that there may be an opportunity to draft additional GM on the approval by the competent authority of the processes and procedures associated with the use of safety nets. As such, in order to ensure the accuracy of GM1 and its correct alignment with ATS.TR.160 we propose an amendment to GM1 ATS.TR.160. Furthermore, the UK CAA requests EASA to consider the development of alternative, or additional GM on the approval by the competent authority of the processes and procedures associated with the use of safety nets. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that GM1 ATS.TR.160 is amended to read as follows: "Information derived from ATS surveillance systems should be used to the extent possible in the provision of ATC service in order to improve capacity and efficiency as well as to enhance safety."	
1114	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(a)	70 - 72	**Paragraph No:** AMC1 ATS.TR.160(a) **Comment:** Through the publication of CAP 774 UK Flight Information Services, the UK has detailed its method of compliance with ICAO Annex 11 and PANS-ATM in relation to the provision of FIS. In accordance with Regulation (EU) 923/2012 (SERA) Article 8, these additional measures complement the ICAO Standard without constituting a difference to it. As such, air traffic controllers licensed in accordance with Regulation (EU) 340/2015 are permitted to provide vectors to aircraft in receipt of a FIS in uncontrolled airspace under certain conditions specified within CAP 774. The UK CAA would wish that the provisions detailed within CAP 774 continue to be viewed as falling within the remit of SERA Article 8 and, in future, Article 3(2) of the Regulation laying down common requirements for service providers and the oversight in ATM/ANS. That said, the UK CAA has identified differences in the wording of SERA Article 8 and Article 3(2) of the common requirements regulation and seeks clarification from EASA that they have the same material intent. **Justification:** Clarification of EU regulatory materials is sought to enable the UK CAA to fully determine its position in relation to AMC1 ATS.TR.160(a).	
1115	1.3. Draft decision (PART-ATS) - AMC1	70 - 72	**Paragraph No:** AMC1 ATS.TR.160(a), point (b)(5)	

	ATS.TR.160(a)		**Comment:** AMC1 ATS.TR.160(a) point (b)(5) states that "the position indications presented on a situation display may be used to… provide flight path monitoring of other pilot-interpreted approaches". However, a pilot-interpreted approach is not defined within the EU Regulatory framework and could therefore be interpreted as meaning any approach flown by the pilot that is not a radar approach; for example, a visual approach requires the pilot to interpret information from the PAPI/VASI. The UK CAA proposes amended text for clarification and to assist understanding. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.160(a), point (b)(5): "(5) provide flight path monitoring of other pilot-interpreted **instrument approach procedures;**"	
1118	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(a)	70 - 72	**Paragraph No:** AMC1 ATS.TR.160(a), point (c)(1)(v) **Comment:** The wording of AMC1 ATS.TR.160(a), point (c)(1)(v) excludes the possibility that an ATS surveillance system may be used to provide navigation assistance to special VFR flights. Accepting that AMC1 ATS.TR.160(d)(3)(b) (transposed from PANS-ATM 8.10.1.1.2) states that "Special VFR flights should not be vectored unless special circumstances, such as emergencies, dictate otherwise"; this does not exclude the provision of navigation assistance as vectoring and navigation assistance are distinct. The UK CAA requests EASA to clarify whether AMC1 ATS.TR.160(a), point (c)(1)(v) should extend the use of an ATS surveillance system to the provision of navigation assistance to special VFR flights. **Justification:** Clarity of EU Regulatory materials.	
1119	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(a)	70 - 72	**Paragraph No:** AMC1 ATS.TR.160(a), point (d)(1) **Comment:** AMC1 ATS.TR.160(a), point (d)(1) permits a FIS officer to provide "suggestions or advice regarding avoiding action"; however, AMC1 ATS.TR.160(a), point (d) excludes the utilisation of an ATS surveillance system by FIS Officers to provide vectoring. Given that "suggestions or advice regarding avoiding action" are offered to pilots as vectors or levels, the UK CAA requests EASA to clarify what form such "suggestions or advice" should take. Moreover, the term avoiding action is not defined within the EU Regulatory framework and implies a form of executive instruction being passed by the FIS officer. The term 'traffic avoidance advice' is defined and better reflects the advisory nature of the information provided to the pilot by the FIS officer. It is also worth highlighting that AMC1 ATS.TR.160(a), point (d)(1) is inconsistent with SERA.6001 and ATS.TR.305(b). SERA.6001 details, inter alia, whether flights are separated and the availability of traffic avoidance advice; however SERA.6001 (f) and (g) and the related Appendix 4 do not specify that traffic avoidance advice is available in class F and class G airspace. Moreover, ATS.TR.305 point (b) only stipulates that information is provided to aircraft operating in airspace Classes C, D, E, F and G on 'collision hazards'; it does not stipulate the provision of traffic avoidance advice. Whilst cognisant that these issues exist within the original ICAO text, the UK CAA believes that it is important to resolve the potentially misleading use of terminology and the inconsistencies identified above in order to	

			correctly transpose these requirements into the EU Regulatory framework. The UK CAA has proposed text below to address the misleading use of un-defined terminology within ATS.TR.160(a), point (d)(1) and requests EASA to address the inconsistencies identified above. **Justification:** Clarity and accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC1 ATS.TR.160(a), point (d)(1) is amended to read as follows: "(1) information regarding any aircraft observed to be on a conflicting path with the identified aircraft and traffic avoidance advice;"	
1122	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(b)(2)	73	**Paragraph No:** AMC1 ATS.TR.160(b)(2), point (c) **Comment:** Given that the text of AMC1 ATS.TR.160(b)(2) is applicable to all ATS personnel who provide an ATS surveillance service, the text should apply to FIS officers in addition to controllers. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.160(b)(2)(c): "(c) assessments of controller**/FIS officer** workloads, taking into account different aircraft capabilities, and sector capacity; and"	
1125	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(c)	73	**Paragraph No:** AMC1 ATS.TR.160(c) **Comment:** Given that the text of AMC1 ATS.TR.160(c) is applicable to all ATS personnel who provide an ATS surveillance service, the text should apply to FIS officers in addition to controllers. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.160(c): "The controller/**FIS officer** should immediately inform an aircraft which has previously been informed that it is provided with ATS surveillance service when, for any reason, the service is interrupted or terminated."	
1127	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(1)	73 - 75	**Paragraph No:** AMC1 ATS.TR.160(d)(1), point (d) **Comment:** AMC1 ATS.TR.160(d)(1), point (d) appears to permit FIS officers to issue changes of heading in order to permit the identification of an aircraft, in that it does not limit the provision to be undertaken by controllers alone. The UK CAA requests EASA to clarify whether they intend to permit FIS officers to issue changes of heading in order to permit the identification of an aircraft. **Justification:** Accuracy and consistency of EU Regulatory materials.	
1130	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.160(d)(1)	76	**Paragraph No:** AMC2 ATS.TR.160(d)(1) **Comment:** AMC2 ATS.TR.160(d)(1) states that "Where an ATS surveillance system is used in surface movement control, the controller/AFIS officer…" Whilst acknowledging that the procedures detailed in AMC2 ATS.TR.160(d)(1) are applicable to a FIS officer,	

			the use of the term 'surface movement control' is inconsistent with EASA's statement in NPA 2016-9(a) that the authority for Aerodrome FIS units to issue instructions to aircraft on the ground "is neither compliant with the FIS principles and requirements established in Annex 11, nor with Article 3(1) of Regulation (EU) 2015/340." The UK CAA requests EASA to clarify whether they intend FIS officers to be able to provide a 'surface movement control' function at aerodromes. **Justification:** Consistency of EU Regulatory materials.	
1131	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.160(d)(1)	77	**Paragraph No:** GM1 ATS.TR.160(d)(1), point (c) **Comment:** GM1 ATS.TR.160(d)(1), point (c) seems to relate to the observation by an "accepting controller/FIS officer" of a squawk/transmit IDENT feature and points the reader to points (b)(7) and (b)(8) of AMC3 ATS.TR.160(d)(1). However, (b)(9) of AMC3 ATS.TR.160(d)(1) relates to the use of the squawk/transmit IDENT feature. As such, the UK CAA believe that the reference to points (b)(7) and (b)(8) is erroneous and that reference should be made instead to point (b)(9). **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM1 ATS.TR.160(d)(1)(c): "(c) The use of procedures in point **(b)(9)** of AMC3 ATS.TR.160(d)(1) requires prior coordination between the controllers/FIS officers, since the indications to be observed by the accepting controller/FIS officer are of short duration."	
1132	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(3)	78 - 79	**Paragraph No:** AMC1 ATS.TR.160(d)(3), point (a)(1) **Comment:** AMC1 ATS.TR.160(d)(3)(a)(1) states that "when an aircraft is given its initial vector diverting it from a previously assigned route, *the pilot should be informed what the vector is to accomplish* and, when practicable, the limit of the vector should be specified (e.g. to ... position, for ... approach)" A requirement to specify the purpose of such a vector would cause an unacceptable increase in RTF loading, particularly in a busy TMA environment where aircraft are routinely vectored diverting it from a SID/STAR for positioning/sequencing/separation. The UK CAA proposes that the sentence structure is amended such that both the reason for and the limit of the vector are provided 'when practicable'. **Justification:** Moderate controller workload and RTF occupancy. **Proposed Text:** The UK CAA proposes that AMC1 ATS.TR.160(d)(3), point (a)(1) is amended to read as follows: "(1) when an aircraft is given its initial vector diverting it from a previously assigned route, when practicable, the pilot should be informed what the vector is to accomplish and the limit of the vector should be specified (e.g. to ... position, for ... approach);"	
1133	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(3)	78 - 79	**Paragraph No:** AMC1 ATS.TR.160(d)(3), point (a)(3) **Comment:** Point (a)(3) of AMC1 ATS.TR.160(d)(3) states that "controlled flights should not be vectored into uncontrolled airspace	

			except in the case of emergency or in order to circumnavigate adverse meteorological conditions". However, given that a FIS is provided in uncontrolled airspace and that this ATS excludes the provision of vectors and instructions, additional guidance is required to explain how the flight may be returned to controlled airspace at a later stage. The UK CAA seeks clarification from EASA on the status of the controlled flight and which ATS is applicable should the aircraft be vectored into uncontrolled airspace. Whilst cognisant that this issue exists within the source PANS-ATM text (8.6.5.1(d)), the UK CAA considers it important for this short-fall to be addressed. **Justification:** Accuracy of EU Regulatory materials.	
1135	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(3)	78 - 79	**Paragraph No:** AMC1 ATS.TR.160(d)(3), point (c) **Comment:** AMC1 ATS.TR.160(d)(3), point (c) states that "In terminating vectoring of an aircraft, the controller should instruct the pilot to resume own navigation, giving the pilot the aircraft's position and appropriate instructions, as necessary, …" The UK CAA argues that the provision of the pilot's position on the completion of vectoring is not always required (for example within an RNAV environment) and could cause an unacceptable increase in RTF loading, particularly in a busy TMA environment where aircraft are routinely vectored diverting it from a SID/STAR for positioning/sequencing/separation. The UK CAA proposes a minor amendment to the structure of the sentence such that the aircraft's position is provided 'as necessary'. It may also be appropriate to develop GM to this amended provision, based upon the text of GM1 ATS.TR.235(a)(5), to highlight that the pilot of an IFR flight "may be unable to determine the aircraft's exact position in respect of obstacles in this area and consequently the altitude which provides the required obstacle clearance." **Justification:** Moderate controller workload and RTF occupancy. **Proposed Text:** The UK CAA proposes that AMC1 ATS.TR.160(d)(3), point (c) is amended to read as follows: "(c) In terminating vectoring of an aircraft, the controller should instruct the pilot to resume own navigation, giving the pilot, as necessary, the aircraft's position and appropriate instructions in the form prescribed in point (b)(2) of AMC1 ATS.TR.160(d)(2), if the current instructions had diverted the aircraft from a previously assigned route."	
1137	1.3. Draft decision (PART-ATS) - GM1 to AMC2 ATS.TR.160(d)(3)	80	**Paragraph No:** GM1 to AMC2 ATS.TR.160(d)(3), point (b) **Comment:** The first sentence of point (b) contains a typographical error. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM1 to AMC2 ATS.TR.160(d)(3)(b): "(b) When clearance for the approach is issued, aircraft **are** expected to…"	
1139	1.3. Draft decision (PART-ATS) - GM3 to AMC2 ATS.TR.160(d)(3)	81 - 82	**Paragraph No:** GM3 to AMC2 ATS.TR.160(d)(3), point (b) **Comment:** The use of the term "in possession" in GM3 to AMC2 ATS.TR.160(d)(3) point (b) suggests a level of cognitive processing,	

			awareness and understanding on the part of the controller which cannot be assured by the ATS provider. Consequently, it would be more appropriate to state that controllers should be provided with information. Whilst acknowledging that the text is transposed directly from PANS-ATM text 8.9.6.1.2, the UK CAA proposes that this is an opportunity to resolve the inappropriate utilisation of this verb. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM3 to AMC2 ATS.TR.160(d)(3): "(b) Controllers conducting radar approaches should be **provided with** information regarding the obstacle clearance altitudes/heights established for the types of approach to be conducted."	
1141	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(6)	84 - 85	**Paragraph No:** AMC1 ATS.TR.160(d)(6), point (d)(2) **Comment:** AMC1 ATS.TR.160(d)(6) point (d)(2) uses the term 'instantaneously' to describe the speed with which communications should be established. However, the term 'instantaneously' has not been defined within the EU Regulatory framework and is therefore open to interpretation which could lead to confusion and lack of consistency amongst Member States. Whilst acknowledging that the text of AMC1 ATS.TR.160(d)(6) point (d)(2) is aligned with that of its source (PANS-ATM 8.7.4.2(c)), the latter document included a note describing the term 'instantaneous' which has not been transposed by EASA. The UK CAA requests EASA to transpose the note to PANS-ATM 8.7.4.2(c) as GM in order to provide clarity on the term 'instantaneously'. **Justification:** Clarity of EU Regulatory materials.	
1142	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.160(d)(6)	84 - 85	**Paragraph No:** AMC1 ATS.TR.160(d)(6), point (d)(5) **Comment:** The final sentence of point (d)(5) of AMC1 ATS.TR.160(d)(6) appears to contain a transposition error. The original PANS-ATM 8.7.4.4(e) text states "…Thereafter, the aircraft should be instructed to change over to the appropriate channel and from that point is the responsibility of the accepting controller." which appears more correct. **Justification:** Accuracy and clarity of EU Regulatory materials and harmonisation with ICAO. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.160(d)(6) point (d)(5): "…"…Thereafter, the aircraft should be instructed to change over to the appropriate channel and from that point **is** the responsibility ~~is~~ of the accepting controller."	
1145	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.160(d)(6)	85	**Paragraph No:** GM1 ATS.TR.160(d)(6) **Comment:** GM1 ATS.TR.160(d)(6) provides a reference to a EUROCONTROL document as the source of the GM. The UK CAA requests EASA to confirm that they have received guarantees from EUROCONTROL that the document will continue to be maintained. **Justification:** Consistency and accuracy of EU Regulatory materials.	
1146	1.3. Draft	86	**Paragraph No:** AMC1 ATS.TR.160(d)(7)	

	decision (PART-ATS) - AMC1 ATS.TR.160(d)(7)		**Comment:** AMC1 ATS.TR.160(d)(7) states that "In the event of complete failure of the ATS surveillance system…the controller should plot the positions of all aircraft already identified." However, no additional GM is provided to explain what actions are required to affect this The UK CAA requests EASA to clarify what it anticipates controllers to do in order to comply with this AMC. **Justification:** Clarification of content of EU Regulatory materials.	
1149	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.160(e)	88	**Paragraph No:** GM1 ATS.TR.160(e) **Comment:** See also UK CAA comments on ATS.TR.160(e). GM1 ATS.TR.160(e) states that "When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should: (a) be informed as to the need for collision avoidance action to be initiated, and if so requested by the pilot or if, in the opinion of the air traffic controller, the situation warrants, a course of avoiding action should be suggested…" Whilst acknowledging that the issue exists in PANS-ATM (8.8.2.2) and has been transposed into SERA, the UK CAA believes that this text is incorrect. When observed to be on a conflicting path with another aircraft, an identified IFR flight operating outside controlled airspace would be provided with traffic information and, if so requested by the pilot or if, in the opinion of the air traffic controller/FIS officer, the situation warranted, a course of traffic avoidance advice would be suggested. The use of the term 'collision avoidance action' in GM1 ATS.TR.160(e), point (a) is inconsistent with elsewhere within Part-ATS where the terms 'traffic avoidance advice' and 'avoiding action' are used (see comment by UK CAA on AMC1 ATS.TR.160(a), point (d)(1)). The term 'collision avoidance action' is not defined within the EU Regulatory framework and implies some form of executive instruction being passed in uncontrolled airspace. The term traffic avoidance advice is defined and better reflects the advisory nature of the information provided to the pilot in uncontrolled airspace. It is also worth highlighting that AMC1 ATS.TR.160(a), point (d)(1) is inconsistent with SERA.6001 and ATS.TR.305(b). SERA.6001 details, inter alia, whether flights are separated and the availability of traffic avoidance advice; however SERA.6001 (f) and (g) and the related Appendix 4 do not specify that traffic avoidance advice is available in class F and class G airspace. Moreover, ATS.TR.305(b) only stipulates that information is provided to aircraft operating in airspace Classes C, D, E, F and G on 'collision hazards'; it too does not stipulate the provision of traffic avoidance advice. Whilst cognisant that these issues exist within the original ICAO text, the UK CAA believes that it is important to resolve the potentially misleading use of terminology and the inconsistencies identified above in order to correctly transpose these requirements into the EU Regulatory framework. Finally, the use of the term 'air traffic controller' in GM1 ATS.TR.160(e), point (a) is inconsistent with the use of the term 'controller' elsewhere within Part-ATS. Moreover, by excluding FIS officers, this provision introduces a further inconsistency with AMC1 ATS.TR.160(a) point (d)(1) which permits FIS officers to use the information displayed on a situation display to provide traffic	

			avoidance advice. The UK CAA believes that the text of this GM should be applicable to FIS officers. However, this links to the earlier comments made by the UK CAA's on AMC1 ATS.TR.160(a) point (d)(1). Specifically that AMC1 ATS.TR.160(a), point (d)(1) permits a FIS officer to provide "suggestions or advice regarding avoiding action"; however, AMC1 ATS.TR.160(a), point (d) excludes the utilisation of an ATS surveillance system by FIS Officers to provide vectoring. Given that "suggestions or advice regarding avoiding action" are offered to pilots as vectors or levels, the UK CAA requests EASA to clarify what form such "suggestions or advice" should take. **Justification:** Clarity, consistency and accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that GM1 ATS.TR.160(e) should be deleted and, following minor amendment, proposes that it should be established as AMC to ATS.TR.305(b)(2) as detailed below. This would support the UK CAA's proposal to delete ATS.TR.160(e) and to insert it as a new requirement within Section 2. **"AMC XX ATS.TR.305(b)(2) Collision Hazard Information Based on ATS Surveillance** When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should: (1) be informed of the conflicting aircraft and, if the pilot requests or if, in the opinion of the controller/FIS officer, the situation warrants, traffic avoidance advice should be suggested; and (2) be notified when the conflict no longer exists."	
1151	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.205(c)	88 - 89	**Paragraph No:** AMC1 ATS.TR.205(c) points (b) and (c) **Comment:** Given recent advances in remote ATS provision and systems to augment visual observation, Part-ATS poses an opportunity to improve and 'future-proof' the text originating from PANS-ATM 7.1.1.2. Moreover, the UK CAA perceives that a short-fall has been created in AMC1 ATS.TR.205(c) by the incomplete transposition of PANS-ATM 7.1.1.2 in that no reference has been included to the development and use of procedures for the control of aerodrome traffic. **Justification:** Consistency of EU regulatory materials with source ICAO text and 'future-proofing' of text. **Proposed Text:** The UK CAA proposes that AMC1 ATS.TR.205(c) points (b) and (c) are amended to read as follows: "b) Aerodrome controllers should maintain a continuous awareness on all flight operations on and in the vicinity of an aerodrome as well as on vehicles and personnel on the manoeuvring area. (c) Controller awareness of aerodrome traffic should be maintained, as far as practicable, by visual observation (either directly or via electro-optical means), augmented in low visibility conditions by an ATS surveillance system, when available. Aerodrome traffic should be controlled in accordance with procedures approved by the competent authority."	

1153	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(a)(3)	89 - 90	**Paragraph No:** AMC1 ATS.TR.210(a)(3), point (c) **Comment:** Amendment 7 to PANS-ATM introduced a note to the text transposed in point (c) stating that "Cancellation of any speed control instruction does not relieve the flight crew of compliance with speed limitations associated with airspace classifications as specified in Annex 11 — Air Traffic Services, Appendix 4"; this latter Annex 11 text having already been transposed as SERA.6001 Appendix 4. The UK CAA proposes that this note is included as GM to AMC 1 ATS.TR.210(a)(3). **Justification:** Consistency of EU Regulatory materials with source ICAO text. **Proposed Text:** The UK CAA proposes the following additional GM to AMC1 ATS.TR.210(a)(3) point (c): "**GMXX AMC1 ATS.TR.210(a)(3)** This GM refers to provisions in point (c) of AMC1 ATS.TR.210(a)(3). Cancellation of any speed control instruction does not relieve the flight crew of compliance with speed limitations associated with airspace classifications as specified in SERA.6001 Classification of airspaces, Appendix 4."	
1154	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(a)(3)	89 - 90	**Paragraph No:** AMC1 ATS.TR.210(a)(3) point (g) **Comment:** It was discussed during RMG.0464 that the text proposed in point (g) is correct for cruising at or above FL250. However, research undertaken within the UK on when aircraft transition in the descent from mach number to IAS indicates that IAS may be used up to FL290. An ANSP confirmed during RMG.0464 that the use of IAS up to FL290 had not been notified to them as an issue by aircraft operators. The UK CAA proposes a minor amendment to the text of point (g) to permit flexibility within the provision to permit the use of IAS up to FL290. **Justification:** Research undertaken within the UK has indicated that aircraft do not operate in strict adherence to the text proposed in point (g) in all flight regimes; thus it would be appropriate to permit some flexibility within the provision. **Proposed Text:** The UK CAA proposes that AMC1 ATS.TR.210(a)(3) point (g) is amended to read as follows: "(g) Except where approved otherwise by the competent authority, at levels at or above 7 600 m (FL 250), speed adjustments should be expressed in multiples of 0.01 Mach; at levels below 7 600 m (FL 250), speed adjustments should be expressed in multiples of 20 km/h (10 kt) based on indicated airspeed (IAS)."	
1156	1.3. Draft decision (PART-ATS) - GM2 to AMC1 ATS.TR.210(a)(3)	90	**Paragraph No:** GM2 to AMC1 ATS.TR.210(a)(3) **Comment:** Whilst cognisant that the error exists within the source PANS-ATM material (Note 2 to 4.6.1.6), GM2 appears to be missing a word. **Justification:** Accuracy of EU Regulatory materials **Proposed Text:** The UK CAA proposes the following amendment to GM2 to AMC1 ATS.TR.210(a)(3): "When an aircraft is heavily loaded and at a high level, its ability to	

			change speed may, in **some** cases, be very limited."	
1158	1.3. Draft decision (PART-ATS) - GM1 to AMC4 ATS.TR.210(a)(3)	92 - 93	**Paragraph No:** GM1 to AMC4 ATS.TR.210(a)(3) point (c) **Comment:** GM1 has been transposed incorrectly and appears to be missing a word. **Justification:** Accuracy of EU Regulatory materials **Proposed Text:** The UK CAA proposes the following amendment to GM1 to AMC4 ATS.TR.210(a)(3) point (c): "(c) ATS units should normally hold aircraft **at** a designated holding fix."	
1161	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.210(a)(3)	94	**Paragraph No:** AMC6 ATS.TR.210(a)(3) point (a) **Comment:** The UK CAA's comments on AMC6 ATS.TR.210(a)(3) point (a) should be read in conjunction with our response to the consultation question posed by EASA in NPA 2016-09(a). Using the flexibility permitted in PANS-ATM 6.5.7.1, the UK issue EAT when a delay of 20 mins or more is expected. Given the high density/high complexity nature of TMA operations in the UK, it has been determined that, at times, it is not feasible for an ATS unit to determine an EAT and transmit it to the aircraft for a delay of less than 20 mins; to do so would significantly increase controller workload and RTF loading. Particularly, given the UK's position in relation to mainland Europe and the Atlantic and the need for interaction between UK ANSPs and ACCs in adjacent FIR/UIR to pass EATs. The UK would propose to retain the flexibility included within PANS-ATM. **Justification:** Consistency of EU regulatory materials with source ICAO text. Moderation of controller workload and RTF occupancy. **Proposed Text:** The UK CAA proposes the following amendment to AMC6 ATS.TR.210(a)(3) point (a): "(a) The appropriate ATS unit should determine an expected approach time for an arriving aircraft that will be subjected to a delay of 10 minutes or more, **or such other period as has been determined by the competent authority."**	
1162	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.210(a)(3)	94	**Paragraph No:** AMC6 ATS.TR.210(a)(3) point (b) **Comment:** Given the UK's position in relation to mainland Europe and the Atlantic it is often the case that an aircraft commences its initial descent from cruising level whilst within an adjacent FIR/UIR. Consequently, given that EAT can expect to change, a requirement to provide EAT "not later than at the commencement of…initial descent from cruising level' would cause increased workload associated with passing EAT to ACC in adjacent FIR/UIR. Moreover, the wording of this latter part of point (b) seems better placed as GM, given that it indicates a preference, rather than a requirement. **Justification:** Moderation of controller workload and RTF occupancy. **Proposed Text:** The UK CAA proposes that AMC6 ATS.TR.210(a)(3) point (b) is amended and the later part placed in GM, as follows: "(b) The expected approach time should be transmitted to the aircraft as soon as practicable."	

			"GM1 to AMC6 ATS.TR.210(a)(3) Operation of ATC service EXPECTED APPROACH TIME The expected approach time should preferably be transmitted to the aircraft not later than at the commencement of its initial descent from cruising level."	
1165	1.3. Draft decision (PART-ATS) - AMC12 ATS.TR.210(a)(3)	98	**Paragraph No:** AMC12 ATS.TR.210(a)(3) point (a)(6) **Comment:** Point (a)(6) requires the aerodrome control tower to pass the correct time to aircraft prior to taxiing for take-off, unless it is known to have already been received by that aircraft. The UK CAA would argue that this requirement is an anachronism, particularly in a European aviation context, and that it would have a negative impact upon RTF occupancy, particularly at aerodromes within busy TMA environments. Moreover, we do not believe that point (a)(6) matches the intent of SERA.3401(d)(1) which states that "Aerodrome control towers shall, prior to an aircraft taxiing for take-off, provide the pilot with the correct time, unless arrangements have been made for the pilot to obtain it from other sources." Point (a)(6) would require the controller to know that the pilot of the aircraft has received the time which is not possible unless stated by the pilot; whereas SERA.3401(d)(1) only requires the controller to know that arrangements are in place for the pilot to obtain the time for themselves. The UK CAA believes that the requirement proposed at point (a)(6) is an anachronism and should be deleted, with the onus placed upon the pilot to request the correct time from the controller if needed. However, if EASA consider that the requirement in point (a)(6) is necessary, then the UK CAA requests EASA to amend the provision such that it reflects the intent of SERA.3401(d)(1). **Justification:** Consistency of European Regulatory materials and moderation of RTF occupancy effects.	
1166	1.3. Draft decision (PART-ATS) - AMC13 ATS.TR.210(a)(3)	99	**Paragraph No:** AMC13 ATS.TR.210(a)(3) point (b) **Comment:** AMC13 ATS.TR.210(a)(3) point (b) states that "When a taxi clearance contains a taxi limit beyond a runway, it should contain an explicit clearance to cross or an instruction to hold short of that runway." The UK CAA argue that, in order to ensure the safeguarding of the runway, taxi clearances in these cases should contain either an explicit clearance to cross, or an instruction to taxi to a specific runway holding point. The UK CAA does not advocate the use of instructions to hold short of a runway as this would leave to the pilot's discretion the exact point at which they would hold short. Moreover, in order to enhance situational awareness, the UK CAA considers that any clearance to cross a runway in-use should be issued on the same frequency as that utilised for the issue of take-off and landing clearances on that runway. **Justification:** Enhance situational awareness and mitigate the risk of runway incursion. **Proposed Text:** The UK CAA proposes the following amendment to AMC13 ATS.TR.210(a)(3) point (b) and additional GM to this provision as follows: "(b) When a taxi clearance contains a taxi limit beyond a runway, it should contain an explicit clearance to cross or an instruction to hold short of the runway **at a corresponding holding point**."	

			"**GMXX to AMC13 ATS.TR.210(a)(3) Operation of ATC service** TAXI CLEARANCE ACROSS A RUNWAY-IN-USE When issuing a crossing instruction of a runway-in-use to a taxiing aircraft, controllers should ensure that the crossing instruction is issued on the same frequency as that utilised for the issuing of take-off and landing clearances on that runway. Any subsequent instruction to change frequency should be issued to the taxiing aircraft after it has vacated the runway."	
1169	1.3. Draft decision (PART-ATS) - AMC14 ATS.TR.210(a)(3)	100	**Paragraph No:** AMC14 ATS.TR.210(a)(3) point (a) **Comment:** Comment on AMC14 ATS.TR.210(a)(3) point (a) is linked with previous UK CAA comment on AMC13 ATS.TR.210(a)(3) point (b). The UK CAA believes that in order to enhance situational awareness, any clearance to cross a runway in-use should be issued on the same frequency as that utilised for the issue of take-off and landing clearances on that runway. AMC14 ATS.TR.210(a)(3) would permit the issue of such a clearance to be made on the ground controller's frequency and would thus reduce the situational awareness of aircraft utilising the runway-in-use. **Justification:** Enhance situational awareness and mitigate the risk of runway incursion. **Proposed Text:** The UK CAA proposes that AMC14 ATS.TR.210(a)(3) point (a) is amended to read as follows: "For the purpose of expediting air traffic, aircraft may be permitted to taxi on the runway-in-use, provided no delay or risk to other aircraft will result. Where control of taxiing aircraft is provided by a ground controller and the control of runway operations by an aerodrome controller, a clearance to taxi on the runway-in-use should be issued by the aerodrome controller once direct two-way communications between the pilot and the aerodrome controller have been established. Any subsequent instruction to change frequency should be issued by the aerodrome controller to the taxiing aircraft after it has vacated the runway."	
1172	1.3. Draft decision (PART-ATS) - AMC15 ATS.TR.210(a)(3)	100 - 101	**Paragraph No:** AMC15 ATS.TR.210(a)(3) figure 1 **Comment:** Figure 1 in AMC15 ATS.TR.210(a)(3) is sourced from PANS-ATM Figure 7.2. ICAO's ATM Ops Panel has identified that the depiction of runway holding positions in Figure 7.2 in Doc 4444 PANS-ATM was inconsistent with the requirements of Annex 14 Volume I paragraph 3.4.7. Specifically, that Figure 7.2 had not been updated in 1969 when changes were made to runway-holding position standards specified in Annex 14. The ATM Ops Panel and ADOP have agreed to delete Figure 7.2 and thus Part-ATS should reflect this. **Justification:** Consistency of EU regulatory materials with ICAO.	
1174	1.3. Draft decision (PART-ATS) - AMC17 ATS.TR.210(a)(3)	102 - 103	**Paragraph No:** AMC17 ATS.TR.210(a)(3), point (b) **Comment:** The UK CAA perceives a need for additional GM related to AMC17 ATS.TR.210(a)(3), point (b) to highlight the safety risk associated with the possibility that a pilot may misinterpret an ATC clearance as a take-off clearance. **Justification:** Mitigate the risk of misinterpretation. **Proposed Text:** The UK CAA proposes the following additional GM	

			to AMC17 ATS.TR.210(a)(3) point (b): "**GMXX to AMC17 ATS.TR.210(a)(3) Operation of ATC service** AERODROME CONTROL — TAKE-OFF CLEARANCE If an ATC clearance could be confused by the pilot with a ground movement instruction or a take-off clearance, the delivery of the ATC clearance should commence with the phrase "after departure" to ensure clarity."	
1175	1.3. Draft decision (PART-ATS) - AMC17 ATS.TR.210(a)(3)	102 - 103	**Paragraph No:** AMC17 ATS.TR.210(a)(3) point (d) **Comment:** The UK CAA seeks clarification from EASA on whether it considers that it is appropriate for aircraft in the HEAVY or SUPER HEAVY wake turbulence categories to be issued with a clearance for immediate take-off. The UK CAA is concerned that such a clearance could result in aircraft in these wake turbulence categories using a greater throttle setting than might be considered normal for taxiing or entry to the runway. **Justification:** Safety.	
1177	1.3. Draft decision (PART-ATS) - AMC18 ATS.TR.210(a)(3)	103	**Paragraph No:** AMC18 ATS.TR.210(a)(3) **Comment:** A typographical error has been introduced in transposition from the original PANS-ATM text (7.10.2). PANS-ATM states that "… a clearance to land *shall* not be issued until…", whereas AMC18 ATS.TR.210(a)(3) states that "… a clearance to land is not be issued until." **Justification:** Consistency and accuracy of EU regulatory materials with ICAO. **Proposed Text:** The UK CAA proposes the following amendment to AMC18 ATS.TR.210(a)(3): "The aerodrome control tower may clear an aircraft to land when there is reasonable assurance that the separation of landing aircraft and preceding landing and departing aircraft using the same runway established in AMC8 ATS.TR.210(d)(2)(i), or the separation prescribed in accordance with AMC9 ATS.TR.210(c)(2)(i) for reduced runway separation minima between aircraft using the same runway, will exist when the aircraft crosses the runway threshold, provided that a clearance to land **should** not be issued until a preceding landing aircraft has crossed the runway threshold. To reduce the potential for misunderstanding, the landing clearance should include the designator of the landing runway.	
1178	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.210(a)(3)	103	**Paragraph No:** GM1 ATS.TR.210(a)(3), point (b) **Comment:** Points (a) and (c) of GM1 ATS.TR.210(a)(3) are transposed directly from PANS-ATM 7.7.2; however, point (b) does not appear to have been sourced from PANS-ATM and appears, in part, to duplicate the intent of the last sentence to point (a). Consequently, the UK CAA does not believe that point (b) adds any additional value to this GM and proposes its deletion. **Justification:** Point (b) duplicates the intent of the final sentence of point (a) and is thus of nugatory value.	
1179	1.3. Draft decision (PART-ATS) - GM2 ATS.TR.210(a)(3)	103	**Paragraph No:** GM2 ATS.TR.210(a)(3) **Comment:** The final sentence of GM2 ATS.TR.210(a)(3) contains a typographical error that has been introduced through the	

			transposition process. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM2 ATS.TR.210(a)(3): "When so instructed by the controller, pilots should obtain approval prior to turning on to any of the aerodrome traffic circuit legs. When extending an aerodrome traffic circuit leg, pilots should report to ATC as soon as there is a risk that ~~the~~ visual contact with the runway cannot be maintained."	
1180	1.3. Draft decision (PART-ATS) - AMC21 ATS.TR.210(a)(3)	107 - 108	**Paragraph No:** AMC21 ATS.TR.210(a)(3) **Comment:** Through the process of transposing BEA Safety Recommendation FRAN-2013-044 into AMC21 ATS.TR.210(a)(3), the intent of AMC21 appears to be inconsistent with that of the original safety recommendation. The original BEA Safety Recommendation states that "*ICAO define standards and recommended practices (SARPS) or procedures for air navigation services (PANS) so that air traffic controllers, except where necessary for safety reasons, do not give instructions that are in contradiction with the published missed-approach procedure; and that, when necessary, the instructions are announced to crews as early as possible during the approach*." The UK CAA proposes a minor amendment below to restore the original intent of the Safety Recommendation. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC21 ATS.TR.210(a)(3) is amended to read as follows: "Except where necessary for safety reasons, when issuing instruction for a missed approach to flight conducting an instrument approach procedure, the controller should adhere to the published missed approach procedure. When any modification to the published missed approach procedure is required for safety reasons, the modification should be issued by the controller as soon as practicable."	
1182	1.3. Draft decision (PART-ATS) - GM2 ATS.TR.210(c)(1)	110 - 111	**Paragraph No:** GM2 ATS.TR.210(c)(1) point (a) **Comment:** The final sentence of GM2 ATS.TR.210(c)(1) point (a) contains a typographical error that has been introduced through the transposition process. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM2 ATS.TR.210(c)(1) point (a): "(a) An aircraft may **be** cleared to a level previously occupied by another aircraft after…"	
1185	1.3. Draft decision (PART-ATS) - AMC3 ATS.TR.210(c)(2)	113 - 114	**Paragraph No:** AMC3 ATS.TR.210(c)(2) point (a)(3) **Comment:** AMC3 ATS.TR.210(c)(2) point (a)(3) refers to a requirement to "verify *frequently* the actual aircraft positions with the predicted positions." However, the term 'frequent' can have specific meaning in a risk analysis context; for instance it has been quantitatively defined as being an event that occurs every $1x10^{-3}$ flight hour (ICAO Doc 9859 – Safety Management Manual).	

			Consequently, the use of such a term within EU regulatory materials could introduce confusion. Acknowledging that the text of AMC3 ATS.TR.210(c)(2) point (a)(3) is aligned with that of its source (PANS-ATM 5.11.1.1(c)), the UK CAA requests EASA to clarify what is meant by 'frequent' and requests EASA to develop additional GM to provide this clarification. **Justification:** Clarity of EU Regulatory materials.	
1186	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(c)(2)	116 - 119	**Paragraph No:** AMC1 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) **Comment:** AMC1 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) both refer to a "frequent determination of position and speed". However, the term 'frequent' can have specific meaning in a risk analysis context; for instance it has been quantitatively defined as being an event that occurs every $1x10^{-3}$ flight hour (ICAO Doc 9859 – Safety Management Manual). Consequently, the use of such a term within EU regulatory materials could introduce confusion. Acknowledging that the text of AMC1 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) are aligned with that of its source (PANS-ATM 5.4.2.2.1.1 (b) and 5.4.2.2.1.2 (b)), the UK CAA requests EASA to clarify what is meant by 'frequent' and requests EASA to develop additional GM to provide this clarification. **Justification:** Clarity of EU Regulatory materials.	
1187	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.210(c)(2)	119 - 123	**Paragraph No:** AMC2 ATS.TR.210(c)(2)(i) **Comment:** AMC2 ATS.TR.210(c)(2)(i) defines a separation standard and includes references to GNSS positions and distances; however, the standard does not define the required navigation specification (i.e. PBN standard) that is required to support that standard. In order to determine separations standards based on GNSS derived positions and distances, a suitable navigation specification standard must be defined in order to ensure not only that position information is suitably accurate, but also that the aircraft's navigational performance is sufficiently accurate to ensure containment within the tolerances of VOR/DME based separations. Therefore, the provisions detailed within Part-ATS cannot safely be implemented in isolation but are dependent upon the navigation specification mandated for the airspace under consideration where GNSS derived positions and distances are used to determine a separation standard. The UK CAA requests EASA to amend the AMC to include the navigation specification that supports the separation standard detailed within the AMC. **Justification:** In order to safely implement separation standards based on GNSS derived positions and distances, particularly in non-surveillance environments, Member States must mandate a suitable PBN standard for the airspace in which the separation standards are to be used. As this AMC defines the separation standard, the associated navigation specification must also be defined. This will enable Member States to select and mandate the correct navigation standard for airspace within which this AMC is to be used.	
1188	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.210(c)(2)	119 - 123	**Paragraph No:** AMC2 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) **Comment:** AMC2 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) both refer to a "frequent determination of position and speed". However, the term 'frequent' can have specific meaning in a risk analysis context; for instance it has been quantitatively defined as being an event that occurs every $1x10^{-3}$ flight hour (ICAO Doc 9859 – Safety	

			Management Manual). Consequently, the use of such a term within EU regulatory materials could introduce confusion. Acknowledging that the text of AMC2 ATS.TR.210(c)(2)(i) points (a)(2) and (b)(2) are aligned with that of its source (PANS-ATM 5.4.2.2.2.1 (b) and 5.4.2.2.2.2(b)) the UK CAA requests EASA to clarify what is meant by 'frequent' and requests EASA to develop additional GM to provide this clarification. **Justification:** Clarity of EU Regulatory materials.	
1189	1.3. Draft decision (PART-ATS) - AMC3 ATS.TR.210(c)(2) 1.3. Draft decision (PART-ATS) - AMC4 ATS.TR.210(c)(2)	123 - 126 126 - 127	**Page No:** 123 to 126 and 126 to 127 **Paragraph No:** AMC3 ATS.TR.210(c)(2)(i) and AMC4 ATS.TR.210(c)(2)(i) **Comment:** Cognisant that civil aircraft may utilise the DME information from a TACAN beacon, EASA are requested to clarify whether the reference to the use DME in AMC3 ATS.TR.210(c)(2)(i) and AMC4 ATS.TR.210(c)(2)(i) includes the use of DME information from a TACAN beacon **Justification:** Clarification of EU Regulatory materials.	
1190	1.3. Draft decision (PART-ATS) - AMC3 ATS.TR.210(c)(2) 1.3. Draft decision (PART-ATS) - GM1 to AMC3 ATS.TR.210(c)(2)	123 - 126 127 - 128	**Page No:** 123 to 126 and 127 to 128 **Paragraph No:** AMC3 ATS.TR.210(c)(2)(i) and GM1 AMC3 ATS.TR.210(c)(2)(i) **Comment:** AMC3 ATS.TR.210(c)(2)(i) and its associated GM define a separation standard and include references to GNSS positions and distances; however, the standard does not define the required navigation specification (i.e. PBN standard) that is required to support that standard. In order to determine separations standards based on GNSS derived positions and distances, a suitable navigation specification standard must be defined in order to ensure not only that position information is suitably accurate, but also that the aircraft's navigational performance is sufficiently accurate to ensure containment within the tolerances of VOR/DME based separations. Therefore, the provisions detailed within Part-ATS cannot safely be implemented in isolation but are dependent upon the navigation specification mandated for the airspace under consideration where GNSS derived positions and distances are used to determine a separation standard. The UK CAA requests EASA to amend the AMC to include the navigation specification that supports the separation standard detailed within the AMC. **Justification:** In order to safely implement separation standards based on GNSS derived positions and distances, particularly in non-surveillance environments, Member States must mandate a suitable PBN standard for the airspace in which the separation standards are to be used. As this AMC defines the separation standard, the associated navigation specification must also be defined. This will enable Member States to select and mandate the correct navigation standard for airspace within which this AMC is to be used.	
1192	1.3. Draft decision (PART-ATS) - AMC4 ATS.TR.210(c)(2)	126 - 127	**Paragraph No:** AMC4 ATS.TR.210(c)(2)(i) **Comment:** AMC4 ATS.TR.210(c)(2)(i) defines a separation standard and includes references to GNSS positions and distances; however, the standard does not define the required navigation specification (i.e. PBN standard) that is required to support that standard. In order to determine separations standards based on GNSS derived positions and distances, a suitable navigation specification standard	

			must be defined in order to ensure not only that position information is suitably accurate, but also that the aircraft's navigational performance is sufficiently accurate to ensure containment within the tolerances of VOR/DME based separations. Therefore, the provisions detailed within Part-ATS cannot safely be implemented in isolation but are dependent upon the navigation specification mandated for the airspace under consideration where GNSS derived positions and distances are used to determine a separation standard. The UK CAA requests EASA to amend the AMC to include the navigation specification that supports the separation standard detailed within the AMC. **Justification:** In order to safely implement separation standards based on GNSS derived positions and distances, particularly in non-surveillance environments, Member States must mandate a suitable PBN standard for the airspace in which the separation standards are to be used. As this AMC defines the separation standard, the associated navigation specification must also be defined. This will enable Member States to select and mandate the correct navigation standard for airspace within which this AMC is to be used.	
1195	1.3. Draft decision (PART-ATS) - AMC4 ATS.TR.210(c)(2) 1.3. Draft decision (PART-ATS) - GM1 to AMC3 ATS.TR.210(c)(2)	126 - 127 127 - 128	**Paragraph No:** GM1 to AMC3 ATS.TR.210(c)(2)(i) and to AMC4 ATS.TR.210(c)(2)(i) point (d) **Comment:** Point (d) states that "controllers should specifically request GNSS-derived distance"; however, no RTF phraseology has been proposed to support this GM. Such RTF phraseology is located in PANS-ATM 12.3.1.10. Whilst the UK CAA understands that it is EASA's intent to transpose the RTF phraseologies contained within PANS-ATM Chapter 12 as part of a SERA maintenance task which will be initiated in 2017, given that Part-ATS proposes to amend SERA, we believe that it would be appropriate for such transposition to occur through Part-ATS. **Justification:** Consistency of EU Regulatory materials with ICAO text and the provision of AMC and/or GM to the provisions already proposed through Part-ATS.	
1197	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.210(c)(2)	128 - 130	**Paragraph No:** AMC6 ATS.TR.210(c)(2)(i) point (b)(2) **Comment:** AMC6 ATS.TR.210(c)(2)(i) point (b)(2) refers to a "simultaneous RNAV distance readings from the aircraft at frequent intervals to..". However, the term 'frequent' can have specific meaning in a risk analysis context; for instance it has been quantitatively defined as being an event that occurs every $1x10^{-3}$ flight hour (ICAO Doc 9859 – Safety Management Manual). Consequently, the use of such a term within EU regulatory materials could introduce confusion. Acknowledging that the text of AMC6 ATS.TR.210(c)(2)(i) point (b)(2) is aligned with that of its source (PANS-ATM 5.4.2.5.5(b)) the UK CAA requests EASA to clarify what is meant by 'frequent' and requests EASA to develop additional GM to provide this clarification. **Justification:** Clarity of EU Regulatory materials.	
1199	1.3. Draft decision (PART-ATS) - GM1 to AMC6 ATS.TR.210(c)(2)	130 - 131	**Paragraph No:** GM1 to AMC6 ATS.TR.210(c)(2)(i) point (a) **Comment:** GM1 to AMC6 ATS.TR.210(c)(2)(i) point (a) refers to 'air–ground communicators'; however, this term is not defined within the EU Regulatory framework. Acknowledging that the text of GM1 to AMC6 ATS.TR.210(c)(2)(i) point (a) is aligned with that of its	

			source (PANS-ATM 5.4.2.5.3), the UK CAA requests EASA to clarify the role and responsibilities of 'air–ground communicators', the nature of their relationship with pilots, FIS officers and controllers and their training and licensing requirements **Justification:** Clarity of EU Regulatory materials.	
1201	1.3. Draft decision (PART-ATS) - AMC7 ATS.TR.210(c)(2)	131	**Paragraph No:** AMC7 ATS.TR.210(c)(2)(i) **Comment:** Whilst Figure 34 relates to the text of AMC7 ATS.TR.210(c)(2)(i), it is not referred to within the main body of the text. Moreover, the readability of AMC7 ATS.TR.210(c)(2)(i) would be enhanced by separating the final elements of the sentence into bullet points. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC7 ATS.TR.210(c)(2)(i) is amended to read as follows: "Except as provided in AMC9 ATS.TR.210(c)(2)(i) as regards reduced runway separation minima between aircraft using the same runway, and in ATS.TR.220 as regards time-based wake turbulence separation minima, the aerodrome control tower should not permit a departing aircraft to commence take-off until: (a) the preceding departing aircraft has crossed the end of the runway in use; or (b) has started a turn; or (c) until all preceding landing aircraft are clear of the runway in use. (see Figure 34)"	
1203	1.3. Draft decision (PART-ATS) - AMC8 ATS.TR.210(c)(2)	132	**Paragraph No:** AMC8 ATS.TR.210(c)(2)(i) Whilst Figure 34 relates to the text of AMC8 ATS.TR.210(c)(2)(i), it is not referred to within the main body of the text. Moreover, the readability of AMC8 ATS.TR.210(c)(2)(i) would be enhanced by separating the final elements of the sentence into bullet points. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC8 ATS.TR.210(c)(2)(i) is amended to read as follows: "Except as provided AMC9 ATS.TR.210(c)(2)(i) as regards reduced runway separation minima between aircraft using the same runway, and in ATS.TR.220 as regards time-based wake turbulence separation minima, the aerodrome control tower should not permit a landing aircraft to cross the runway threshold on its final approach until: (a) the preceding departing aircraft has crossed the end of the runway in use; or (b) has started a turn; or (c) until all preceding landing aircraft are clear of the runway in use. (see Figure 34)"	
1205	1.3. Draft decision (PART-ATS) - AMC10 ATS.TR.210(c)(2)	134 - 135	**Paragraph No:** AMC10 ATS.TR.210(c)(2)(i) point (a) **Comment:** Point (a) contains a typographical error in that it describes the application of "an 1-minute separation". **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to	

			AMC10 ATS.TR.210(c)(2)(i) point (a): “(a) The aerodrome controller should apply **a** 1-minute separation …”	
1208	1.3. Draft decision (PART-ATS) - AMC10 ATS.TR.210(c)(2)	134 - 135	**Paragraph No:** AMC10 ATS.TR.210(c)(2)(i) point (c) **Comment:** Point (c) uses the term ‘following’ to describe the second departing aircraft; however, this term is inconsistent with the preceding text on this subject, all of which refers to ‘succeeding aircraft’; AMC9 ATS.TR.210(c)(2)(i) points (f)(1)(i), (f)(1)(ii), (f)(1)(iii), (f)(2)(i), (f)(2)(ii) and (f)(2)(iii) refer. **Justification:** Consistency of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC10 ATS.TR.210(c)(2)(i) point (c): “(c) The controller should apply a 2-minute separation between take-offs when the preceding aircraft is 74 km/h (40 kt) or more faster than the **succeeding** aircraft and both aircraft will follow the same track (see Figure 36).”	
1209	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(c)(2)	136 - 139	**Paragraph No:** AMC1 ATS.TR.210(c)(2)(ii) point (a) **Comment:** AMC1 ATS.TR.210(c)(2)(ii) point (a) states that lateral separation may be applied through the use of “position reports which positively indicate that the aircraft are over different geographic locations as determined visually or by reference to a navigation aid.” Experience indicates that the selection of such geographic locations should be subject to an assessment by the ATS provider and subsequent approval by the competent authority to ensure their appropriateness for the intended use. **Justification:** Safety **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.210(c)(2)(ii) point (a): “By position reports which positively indicate that the aircraft are over different geographic locations as determined visually or by reference to a navigation aid (see Figure 39). **Such geographic locations should be determined by the ATS provider and approved by the competent authority.”**	
1211	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(c)(2)	136 - 139	**Paragraph No:** AMC1 ATS.TR.210(c)(2)(ii), point (b)(1) **Comment:** AMC1 ATS.TR.210(c)(2)(ii) point (b)(1) states that when utilising VOR, “both aircraft are established on radials diverging by at least 15 degrees and at least one aircraft is at a distance of 28 km (15 NM) or more from the facility.” However, this assumes that the VOR is co-located with a DME in order to determine that “at least one aircraft is at a distance of 28 km (15 NM) or more from the facility” and this may not be the case. In order to allow for those occasions where a DME is not co-located with the VOR, a time-based separation should be included as an alternative within the provision. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.210(c)(2)(ii) point (b)(1): “VOR: both aircraft are established on radials diverging by at least	

			15 degrees and at least one aircraft is at a distance of 28 km (15 NM) or more **or, 4 minutes from the facility; whichever is the greater value."**	
1213	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(c)(2)	136 - 139	**Paragraph No:** AMC1 ATS.TR.210(c)(2)(ii) point (b)(2) **Comment:** AMC1 ATS.TR.210(c)(2)(ii) point (b)(2) states that when utilising NDB "both aircraft are established on tracks to or from the NDB which are diverging by at least 30 degrees and at least one aircraft is at a distance of 28 km (15 NM) or more from the facility." However, this assumes that the NDB is co-located with a DME in order to determine that "at least one aircraft is at a distance of 28 km (15 NM) or more from the facility" and this may not be the case. In order to allow for those occasions where a DME is not co-located with the NDB, a time-based separation should be included as an alternative within the provision. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC1 ATS.TR.210(c)(2)(ii) point (b)(2): "NDB: both aircraft are established on tracks to or from the NDB which are diverging by at least 30 degrees and at least one aircraft is at a distance of 28 km (15 NM) or more **or, 4 minutes from the facility; whichever is the greater value**."	
1215	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.210(c)(2)	136 - 139	**Paragraph No:** AMC1 ATS.TR.210(c)(2)(ii) point (b)(3) and (4) **Comment:** AMC1 ATS.TR.210(c)(2)(ii) defines a separation standard and includes references to GNSS positions and distances; however, the standard does not define the required navigation specification (i.e. PBN standard) that is required to support that standard. In order to determine separations standards based on GNSS derived positions and distances, a suitable navigation specification standard must be defined in order to ensure not only that position information is suitably accurate, but also that the aircraft's navigational performance is sufficiently accurate to ensure containment within the tolerances of VOR/DME based separations. Therefore, the provisions detailed within Part-ATS cannot safely be implemented in isolation but are dependent upon the navigation specification mandated for the airspace under consideration where GNSS derived positions and distances are used to determine a separation standard. The UK CAA requests EASA to amend the AMC to include the navigation specification that supports the separation standard detailed within the AMC. **Justification:** In order to safely implement separation standards based on GNSS derived positions and distances, particularly in non-surveillance environments, Member States must mandate a suitable PBN standard for the airspace in which the separation standards are to be used. As this AMC defines the separation standard, the associated navigation specification must also be defined. This will enable Member States to select and mandate the correct navigation standard for airspace within which this AMC is to be used.	
1216	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.220	141	**Paragraph No:** AMC1 ATS.TR.220 **Comment:** The wake turbulence categorisations detailed within AMC1 ATS.TR.220 are widely recognised as being overly restrictive and ICAO has been working with the FAA and EUROCONTROL to develop an amendment to the 'HEAVY/MEDIUM/LIGHT' categorisation	

			within PANS-ATM. Whilst this work has yet to conclude, Europe has developed the RECAT EU schema which has been proposed by France, Germany and the UK to be adopted into ICAO Doc 7030 – EUR SUPP. Given that EASA has confirmed that RECAT EU may be used by States and Air Navigation Service Providers as a basis to update their current schemes, it would seem appropriate to refer to it within Part-ATS. As such, the UK CAA proposes additional GM to ATS.TR.220 relating to RECAT EU. **Justification:** RECAT EU has been recognised by EASA as providing a basis for Member States and Air Navigation Service Providers to update their current wake turbulence schemes. As such, rather than Part-ATS only referring to the now dated 'HEAVY/MEDIUM/LIGHT' categorisation within PANS-ATM, it would seem appropriate to at least refer to RECAT EU. **Proposed Text:** The UK CAA proposes the following additional GM to ATS.TR.220: "**GMXX to ATS.TR.220 Application of wake turbulence separation** The European Wake Turbulence Categorisation and Separation Minima on Approach and Departure (RECAT EU) scheme has been approved by EASA as a basis for Member States and Air Navigation Service Providers to update their current schemes. Guidance on the scheme is available from EUROCONTROL."	
1217	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.220 1.3. Draft decision (PART-ATS) - GM1 to AMC1 ATS.TR.220	141 141	**Paragraph No:** AMC1 ATS.TR.220 to GM1 to AMC1 ATS.TR.220 **Comment:** AMC and GM associated with ATS.TR.220 do not specifically mention wake turbulence separation minima that should be applied in the event of an aircraft 'going around' or executing a 'missed approach'. Whilst acknowledging the difficulties of providing detailed and/or prescriptive guidance in this matter, and the lack of such detail in the original PANS-ATM text, the UK CAA requests EASA to provide clarification on the leader/follower relationship in the event of an aircraft 'going around' or executing a 'missed approach'. **Justification:** Clarity of EU Regulatory materials.	
1218	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.220	141 - 142	**Paragraph No:** AMC2 ATS.TR.220 **Comment:** AMC2 ATS.TR.220 refers to the application of a procedural time based wake turbulence separation; however, the provision of TBS may now be supported by an ATS surveillance system. It would be appropriate to differentiate between these procedural and surveillance based TBS in order to avoid confusion. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to the title of AMC2 ATS.TR.220: "AMC2 ATS.TR.220 Application of wake turbulence separation **PROCEDURAL SEPARATION** – TIME-BASED WAKE TURBULENCE LONGITUDINAL SEPARATION MINIMA — ARRIVING AIRCRAFT"	
1219	1.3. Draft decision (PART-ATS) - AMC3 ATS.TR.220	142 - 144	**Paragraph No:** AMC3 ATS.TR.220 **Comment:** AMC3 ATS.TR.220 refers to the application of a procedural time based wake turbulence separation; however, the provision of TBS may now be supported by an ATS surveillance	

			system. It would be appropriate to differentiate between these procedural and surveillance based TBS in order to avoid confusion. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to the title of AMC3 ATS.TR.220: "AMC3 ATS.TR.220 Application of wake turbulence separation **PROCEDURAL SEPARATION** – TIME-BASED WAKE TURBULENCE LONGITUDINAL SEPARATION MINIMA — DEPARTING AIRCRAFT"	
1220	1.3. Draft decision (PART-ATS) - AMC3 ATS.TR.220	142 - 144	**Paragraph No:** AMC3 ATS.TR.220 point (c)(1) **Comment:** The reference to Figure 44 within AMC3 ATS.TR.220 point (c)(1) is incorrect; Figure 44 only relates to operations from parallel runways, not from a single runway. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC3 ATS.TR.220 point (c)(1): "(1) the same runway ~~(See Figure 44)~~;"	
1221	1.3. Draft decision (PART-ATS) - AMC4 ATS.TR.220	144	**Paragraph No:** AMC4 ATS.TR.220 **Comment:** AMC4 ATS.TR.220 refers to the application of a procedural time based wake turbulence separation; however, the provision of TBS may now be supported by an ATS surveillance system. It would be appropriate to differentiate between these procedural and surveillance based TBS in order to avoid confusion. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to the title of AMC4 ATS.TR.220: "AMC4 ATS.TR.220 Application of wake turbulence separation **PROCEDURAL SEPARATION –** TIME-BASED WAKE TURBULENCE LONGITUDINAL SEPARATION MINIMA — DISPLACED LANDING THRESHOLD"	
1223	1.3. Draft decision (PART-ATS) - AMC4 ATS.TR.220	144	**Paragraph No:** AMC4 ATS.TR.220 points (a)(1) and (2) **Comment:** AMC4 ATS.TR.220 points (a)(1) and (2) include a typographic error in that they refer to "an SUPER aircraft". **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC4 ATS.TR.220 points (a)(1) and (2): "(1) a departing LIGHT or MEDIUM aircraft follows **a** SUPER aircraft arrival; or (2) an arriving LIGHT or MEDIUM aircraft follows **a** SUPER aircraft departure if the projected flight paths are expected to cross."	
1224	1.3. Draft decision (PART-ATS) - AMC5 ATS.TR.220	145 - 146	**Paragraph No:** AMC5 ATS.TR.220 **Comment:** AMC5 ATS.TR.220 refers to the application of a procedural time-based wake turbulence separation. Whilst the UK CAA is cognisant that an opposite direction time-based wake	

			turbulence separation is unlikely to be supported by an ATS surveillance system based tool, we consider that it would be appropriate to highlight within the title of the AMC its procedural nature, in order to maintain consistency with our other proposals on AMC to ATS.TR.220. **Justification:** Clarity of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to the title of AMC5 ATS.TR.220: "AMC5 ATS.TR.220 Application of wake turbulence separation **PROCEDURAL SEPARATION** – TIME-BASED WAKE TURBULENCE LONGITUDINAL SEPARATION MINIMA — OPPOSITE DIRECTION"	
1225	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.220	146	**Paragraph No:** AMC6 ATS.TR.220, Table **Comment:** A typographical error has occurred in the title of column 1 of the table; 'aircraft' is spelt incorrectly. **Justification:** Accuracy of EU Regulatory materials.	
1227	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.220	146	**Paragraph No:** AMC6 ATS.TR.220, point (b) **Comment:** The statement in the right-hand column of the table that wake turbulence separation minima are "not required" between SUPER or HEAVY aircraft and a succeeding SUPER aircraft is misleading, as it does not contain the full context given to it in ICAO TEC/OPS/SEP – 08-0294.SLG 'Wake turbulence aspects of Airbus A380-800 aircraft', dated 08 July 2008. This states that "When a wake turbulence restriction is not required then separation reverts to radar separation minimum as prescribed by the appropriate ATS authority. The recommendation of the ad hoc group (safety case) indicated that no wake constraint exists for the A380-800 either following another A380-800 or a non-A380-800 HEAVY aircraft. The UK CAA requests EASA to amend the text of the right-hand column of the table to state that a wake turbulence separation is not required and to develop GM which replicates the content of ICAO TEC/OPS/SEP – 08-0294.SLG dated 08 July 2008. **Justification:** Accuracy of EU Regulatory materials.	
1228	1.3. Draft decision (PART-ATS) - AMC6 ATS.TR.220	146	**Paragraph No:** AMC6 ATS.TR.220 point (b)(2) **Comment:** AMC6 ATS.TR.220 point (b)(2) refers to a separation of 760 m but the text does not include a conversion within brackets from 760 m to 2 500 ft and is thus inconsistent with preceding text. **Justification:** Accuracy and consistency of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC6 ATS.TR.220 point (b)(2): "2) both aircraft are using the same runway, or parallel runways separated by less than 760 m **(2 500 ft);** or"	
1230	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.230(a)(1)	151	**Paragraph No:** GM1 ATS.TR.230(a)(1)(ii) **Comment:** The UK CAA believes that the title of this GM is incorrect. ATS.TR.230(a)(1)(ii) does not exist; we believe that this should refer to ATS.TR.230(a)(3)(i). **Justification:** Accuracy of EU Regulatory materials.	

			Proposed Text: The UK CAA proposes the following amendment: "GM1 ATS.TR.230**(a)(3)(i)** Transfer of responsibility for control"	
1231	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.235(a)(5)	158 - 159	**Paragraph No:** GM1 ATS.TR.235(a)(5) **Comment:** A number of typographical errors have been introduced within this text which affects its readability. The first sentence is missing the letter 'a' between 'when' and 'controller'. The second sentence is incorrectly transposed from note 1 to PANS-ATM 8.6.5.2 and should read 'in respect to obstacles in this area…'. **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the that GM1 ATS.TR.235(a)(5) is amended to read as follows: "Prescribed obstacle clearance will exist at all times when a controller issues clearances at or above the established minimum flight altitudes. When an IFR flight is being vectored, the pilot may be unable to determine the aircraft's exact position in respect **to** obstacles in this area and consequently the altitude which provides the required obstacle clearance."	
1232	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.255	166 - 167	**Paragraph No:** AMC1 ATS.TR.255 to GM1 ATS.TR.255 **Comment:** Throughout the AMC and GM associated with ATS.TR.255, the text refers exclusively to ILS and MLS; however, the ICAO Europe Parallel Runway Task Force has undertaken work to expand the scope to include Approach Procedure with vertical guidance (APV) and Ground Based Augmentation System (GBAS) Landing System (GLS) instrument approach procedures. The UK CAA requests EASA to consider amendment of the text to 'future-proof' it by removing specific references to ILS/MLS. **Justification:** 'Future-proofing' of EU Regulatory materials.	
1233	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.255	167 - 168	**Paragraph No:** AMC2 ATS.TR.255, point (a) **Comment:** AMC2 ATS.TR.255 point (a) states that "Whenever parallel approaches are carried out, separate controllers should be responsible for the sequencing and spacing of arriving aircraft to each runway." The UK CAA considers that this is an overly restrictive requirement and that there may be circumstances in which it is permissible for a single controller to undertake the task, following a local safety assessment and approval by the competent authority. As such, flexibility should be included within the AMC to permit this. **Justification:** Flexibility and proportionality of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to AMC2 ATS.TR.255 point (a): "(a) Whenever parallel approaches are carried out, **except where approved by the competent authority**, separate controllers should be responsible for the sequencing and spacing of arriving aircraft to each runway."	
1234	1.3. Draft decision (PART-	167 -	**Paragraph No:** AMC2 ATS.TR.255, point (b)(7)	

	ATS) - AMC2 ATS.TR.255	168	**Comment:** When combined with the preamble text at point (b), the wording of AMC2 ATS.TR.255 changes the intent of the original PANS-ATM text (6.7.3.2.3) and states that independent parallel approaches should only be conducted to parallel runways where vectoring is used to intercept the ILS localise course of the MLS final approach track. This precludes the possibility that the aircraft may be following a published arrival and approach procedure that does not require vectoring. Moreover, a minor amendment to the text could introduce a measure of 'future proofing' by removing specific references to the use of ILS/MLS. **Justification:** Accuracy and 'future-proofing' of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC2 ATS.TR.255 point (b)(7) is amended to read as follows: "(7) The final approach course or track is intercepted at an angle not greater than 30 degrees and providing at least 2 km (1.0 NM) straight and level flight prior to the intercept, either by the use of vectoring or a published arrival and instrument approach procedure. The vector or procedure should also enable the aircraft to be established on the final approach course or track in level flight for at least 3.7 km (2.0 NM) prior to intercepting the glide path or specified elevation angle."	
1235	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.255	167 - 168	**Paragraph No:** AMC2 ATS.TR.255 points (b)(8) and (b)(11) **Comment:** AMC2 ATS.TR.255 points (b)(8) and (b)(11) refer to a "300 m (1 000 ft) vertical separation" and as such are related to ATS.TR.210(c)(1) regarding the vertical separation minimum of a "nominal 300 m (1 000 ft)". Consequently, for the purposes of consistency, AMC2 ATS.TR.255 points (b)(8) and (b)(11) should be amended to reflect the 'nominal' nature of the 300 m (1 000 ft) vertical separation. There are additional detailed, technical arguments related to the importance of the inclusion of the term 'nominal' which the UK CAA would be pleased to present separately to the Agency but which were not considered appropriate to be included within our consultation response. Whilst the UK CAA accepts that this lack of consistency exists in the source ICAO text, we believe that this is an oversight that should be addressed by EASA in developing Part-ATS **Justification:** Consistency of EU Regulatory materials with intent of source ICAO text. **Proposed Text:** The UK CAA proposes the following amendments to AMC2 ATS.TR.255 points (b)(8) and (b)(11): "(8) a minimum of **a nominal** 300 m (1 000 ft) vertical separation or... (11) controller ensures that when the **nominal** 300 m (1 000 ft) vertical separation is reduced:"	
1236	1.3. Draft decision (PART-ATS) - AMC2 ATS.TR.255	167 - 168	**Paragraph No:** AMC2 ATS.TR.255 point (c) **Comment:** This comment is linked with that made by UK CAA on AMC2 ATS.TR.255 point (b)(7). The text of AMC2 ATS.TR.255 point (c) would benefit from minor amendment to aid readability. Moreover, AMC2 ATS.TR.255 point (c) includes text that appears to	

			be better placed as GM, rather than AMC. Finally, a minor amendment to the text could introduce a measure of 'future proofing' by removing specific references to the use of ILS/MLS. **Justification:** Readability of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that AMC2 ATS.TR.255 point (c) is amended and a new GM is introduced, as below: "(c) Regarding independent parallel approaches to parallel runways spaced by less than 1 525 m between their centre lines, meteorological conditions can increase final approach course and/or track deviations to the extent that safety may be impaired. The meteorological conditions under which said approaches are to be suspended, should be proposed by the ATS provider and approved by the competent authority." – "**GMXX to AMC2 ATS.TR.255(c) Operations on parallel or near-parallel runways** These meteorological conditions include but are not limited to wind shear, turbulence, downdrafts, crosswind and significant meteorological conditions such as thunderstorms."	
1238	1.3. Draft decision (PART-ATS) - GM6 to AMC2 ATS.TR.255	170	**Paragraph No:** GM6 to AMC2 ATS.TR.255 **Comment:** For consistency with other references to ICAO documents made within Part-ATS, the text should refer to the "**ICAO** Manual on Simultaneous Operations on Parallel or Near-Parallel Instrument Runways (SOIR) (Doc 9643)" **Justification:** Consistency of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM6 to AMC2 ATS.TR.255: "With reference to point (c) of AMC2 ATS.TR.255, guidance material relating to meteorological conditions is contained in the **ICAO** Manual on Simultaneous Operations on Parallel or Near-Parallel Instrument Runways (SOIR) (Doc 9643)."	
1239	1.3. Draft decision (PART-ATS) - GM2 to AMC3 ATS.TR.255	171	**Paragraph No:** GM2 to AMC3 ATS.TR.255 **Comment:** The text of GM2 to AMC3 ATS.TR.255 contains 2 typographical errors. Firstly, no space is included within the title between '255' and 'operations'. Secondly, the text refers to point (a)(3) of AMC2 ATS.TR.255. Point (a)(3) of AMC2 ATS.TR.255 does not exist; the UK CAA believes that this should refer to point (a)(3) of AMC3 ATS.TR.255 **Justification:** Accuracy of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM2 to AMC3 ATS.TR.255: "**GM2 to AMC3 ATS.TR.255 Operations on parallel or near-parallel runways** With reference to point (a)(3) of **AMC3** ATS.TR.255, other equivalent ATS surveillance systems (e.g. ADS-B or MLAT) may be used to provide the services, provided that a performance capability equal to or better than that required can be demonstrated."	
1240	1.3. Draft	172		

	decision (PART-ATS) - GM1 ATS.TR.255		**Paragraph No:** GM1 ATS.TR.255 **Comment:** For consistency with other references to ICAO documents made within Part-ATS, the text should refer to the "**ICAO** Manual on Simultaneous Operations on Parallel or Near-Parallel Instrument Runways (SOIR) (Doc 9643)" **Justification:** Consistency of EU Regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM1 ATS.TR.255: "Guidance material relating to operations on parallel or near-parallel runways is contained in the **ICAO** Manual on Simultaneous Operations on Parallel or Near-Parallel Instrument Runways (SOIR) (Doc 9643)."	
1241	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.270(a)(3)	175	**Paragraph No:** GM1 ATS.TR.270(a)(3) **Comment:** GM1 ATS.TR.270(a)(3) refers to a reported ground visibility at the aerodrome of less than 1 500 m in relation to the issuance of a special VFR clearance; however, this is inconsistent with SERA.5010(b)(2) which states that a visibility of not less than 800 m may be used by pilots of helicopters. The UK CAA requests EASA to clarify the ground visibility criteria for the issuance of a special VFR clearance, particularly for helicopters. **Justification:** Clarity of EU Regulatory materials.	
1242	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.275	175	**Paragraph No:** GM1 ATS.TR.275 **Comment:** The UK CAA believe that where ATS are provided based upon an ATS surveillance system, then pressure-altitude-derived level information should be verified by each suitably equipped ATS unit on initial contact with the aircraft concerned, irrespective of where FIS or ATC service is being provided. Moreover, we see an inconsistency in the inclusion of a provision relating to providers of FIS being incorporated as GM to a provision relating to providers of ATC service. As such, the UK CAA would request that EASA develop a bespoke provision relating to FIS and the verification of pressure-altitude-derived level information. **Justification:** Clarity and consistency of EU regulatory materials.	
1243	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.275(a)	175 - 176	**Paragraph No:** GM1 ATS.TR.275(a) **Comment:** GM1 ATS.TR.275(a) directs controllers to undertake specific actions on identifying erroneous level information, rather than simply providing information to aid understanding and compliance with ATS.TR.275. As such, the UK CAA considers that the text of GM1 ATS.TR.275(a) should be elevated to AMC status. **Justification:** Consistency of content between AMC and GM within EU Regulatory materials.	
1245	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.275(b)	176	**Paragraph No:** AMC1 ATS.TR.275(b), point (a) **Comment:** The text contained within AMC1 ATS.TR.275(b) point (a) duplicates that in AMC1 ATS.TR.275(a) and as such appears to be superfluous. UK CAA proposes that AMC1 ATS.TR.275(b) point (a) is deleted. **Justification:** Removal of superfluous provisions from EU Regulatory	

			materials.	
1246	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.305	178 - 180	**Paragraph No:** AMC1 ATS.TR.305 point (a)(1)(ii) and (iii) **Comment:** The UK CAA seeks clarification from EASA on the difference between 'a general call' and a 'broadcast'? A broadcast is defined in Annex 10 Vol II as 'a transmission of information relating to air navigation that is not addressed to a specific station or stations'; however, the term 'general call' is not defined. Annex 10 Vol II is inconsistent in its use of these terms in that it uses 'general call' as a synonym for 'broadcast' but also, in 7.2.2, suggests that the term 'general call' refers to the words used to call attention to the information which is to be broadcast, for example "ALL STATIONS". Whilst cognisant that PANS-ATM 9.1.3.1.1 introduces this inconsistency, the CAA requests EASA to either clarify the difference between 'a general call' and a 'broadcast', or, where no difference is believed to exist, standardise on one term. **Justification:** Consistency of EU Regulatory materials.	
1247	1.3. Draft decision (PART-ATS) - AMC1 ATS.TR.305	178 - 180	**Paragraph No:** AMC1 ATS.TR.305 point (e) **Comment:** AMC1 ATS.TR.305 point (e) refers to the transmission of SPECI and special reports in the SPECI code form. However, in Europe, there is no requirement to provide SPECI reports and thus the text of point (e) will require amendment. **Justification:** Accuracy of EU Regulatory materials.	
1248	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.305(a)(b)	180	**Paragraph No:** GM1 ATS.TR.305(a);(b);(c) **Comment:** The content of GM1 ATS.TR.305(a);(b);(c) appears to duplicate the intent of GM1 ATS.TR.305(a)(5), yet it lacks the further detail contained in points (a) and (c) to GM1 ATS.TR.305(a)(5) and thus adds nugatory value. Moreover, given the content of ATS.TR.305(a)(5), it appears more relevant to associate the GM with this provision. The UK CAA proposes that GM1 ATS.TR.305(a);(b);(c) should be deleted and that GM1 ATS.TR.305(a)(5) should be retained. **Justification:** Removal of superfluous provisions from EU Regulatory materials.	
1249	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.305(c)(2)	184 - 185	**Paragraph No:** GM1 ATS.TR.305(c)(2) **Comment:** Whilst the wording of GM1 ATS.TR.305(c)(2) indicates that the list of considerations in selecting the runway in use is not exhaustive, the list excludes other relevant considerations which are included in ATS.TR.260. Moreover, EASA has not fully transposed the content of the EUROCONTROL Manual of AFIS paragraph 3.2 on the 'Selection of Runway'. Finally, the presentation of ATS.TR.260 relating to the selection of the runway in use by units providing aerodrome control service allows the reader to more easily assimilate the content. **Justification:** Clarity and readability of EU Regulatory materials. **Proposed Text:** The UK CAA proposes that GM1 ATS.TR.305(c)(2) is amended to read as follows: "**GM1 ATS.TR.305(c)(2) Scope of flight information service** SELECTION OF THE RUNWAY IN USE AT AFIS AERODROMES (a) Normally, an aircraft will land and take off into wind unless safety	

			or other local factors determine that a different direction is preferable. (b) In selecting the runway in use for take-off and landing of aircraft, besides surface wind speed and direction, other relevant factors should be taken into consideration such as: (1) runway configuration; (2) meteorological conditions; (3) instrument approach procedures; (4) approach and landing aids available; (5) aerodrome traffic circuits; (6) airspace considerations; (7) length of runways; (8) other factors indicated in local instructions."	
1250	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.310(g)	185	**Paragraph No:** GM1 ATS.TR.310(g) **Comment:** GM1 ATS.TR.310(g) states that "The ATIS broadcast message should take into consideration human performance" but provides no further guidance on this matter to detail these principles, nor in which way they should be considered. PANS-ATM includes a note which refers to the Human Factors Training Manual *(Doc 9683).* Whilst acknowledging the age of this publication, the absence of any detailed guidance on the Human Factors principles referred to in GM1 ATS.TR.310(g) weakens the value of the GM itself. In other areas of Part-ATS there are GM which refer the reader to specific documents which can be utilised to access specific information. The UK CAA proposes that EASA should identify more recent documents relating to Human Factors principles which could be referred to within the GM. **Justification:** Ensuring the value of EU regulatory materials.	
1251	1.3. Draft decision (PART-ATS) - GM1 ATS.TR.400(b)	186 - 187	**Paragraph No:** GM1 ATS.TR.400(b), point (a) **Comment:** As currently worded, GM1 ATS.TR.400(b) point (a) can be interpreted as meaning that the ATS unit of the FIR or control area are responsible for coordinating the alerting service in all 3 situations described in (a)(1), (a)(2) and (a)(3) simultaneously. The text should read as either option (a)(1) or option (a)(2) or option (a)(3). Whilst cognisant that this error exists within the original PANS-ATM text (9.2.2.2), the UK CAA believes that it should be resolved before transposition into the EU regulatory framework. **Justification:** Clarity of EU regulatory materials. **Proposed Text:** The UK CAA proposes the following amendment to GM1 ATS.TR.400(b) point (a): "(a) When alerting service is required in respect of a flight operated through more than one FIR or control area, and when the position of the aircraft is in doubt, responsibility for coordinating such service should rest with the ATS unit of the FIR or control area: (1) within which the aircraft was flying at the time of last air–ground radio contact; **or**, (2) that the aircraft was about to enter when last air–ground contact was established at or close to the boundary of two FIRs or control areas; **or**, (3) within which the aircraft's intermediate stop or final destination	

			point is located if the aircraft was not: (i) equipped with suitable two-way radio communication equipment; or (ii) under obligation to transmit position reports.”	