

All NATMAC Representatives

6 May 2010
DAP/EAPC/MC/SPI&AcID

NATMAC INFORMATIVE LETTER

Dear Assemblies,

SINGLE EUROPEAN SKY MANDATE ON SURVEILLANCE PERFORMANCE AND INTEROPERABILITY REQUIREMENTS (SPI) AND AIRCRAFT IDENTIFICATION (ACID)

At NATMAC 67 we discussed EUROCONTROL's consultation using the EUROCONTROL Notice of Proposed Rule-Making process on the development of Implementing Rules (IRs) for Surveillance Performance and Interoperability requirements (SPI – ENPRM/10-003A) and Aircraft Identification (ACID – ENPRM/10-003B). Consultation closed on 5 May 2010, and the purpose of this letter is to advise you of the CAA's response to EUROCONTROL. Please find this attached.

A workshop presenting the outcomes of the formal consultation is planned for 1 June 2010, and EUROCONTROL expects to submit the Final Report on the mandates to the European Commission (EC) by the end of June 2010. If the proposed legislation is acceptable to the EC, it should then be presented to the Single Sky Committee for approval.

Details of the SPI mandate and the associated consultation package can be found on the EUROCONTROL website at http://www.eurocontrol.int/enprm/public/standard_page/enprm10003.html.

Yours sincerely,

Mark Swan

M Swan
Director of Airspace Policy

Enclosure:

UK Response to SPI IR Formal Consultation
UK Response to ACID IR Formal Consultation

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



Please return this response sheet by **05 May 2010** to:

Mr Jean-Luc GARNIER,
CND Deputy Director
for Single European Sky Implementation,
EUROCONTROL,
Rue de la Fusée, 96,
B – 1130 BRUSSELS,
Belgium

or by E-mail to sesframework@eurocontrol.int

or by fax to +322 729 5190

NOTES FOR THE USE OF THE CONSULTATION RESPONSE SHEET

1. All comments on the associated Consultation material must be made using this response sheet. Comments submitted not using this sheet will be referred back to the originator.
2. As a minimum, Sections 1, 2, 4, 5 and 6 of the Response Sheet Main Page must be completed before returning the response.
3. Formal comments are invited on the contents of the draft implementing rule on Surveillance Performance and Interoperability Requirements (Enclosure 1). *Please do **not** submit comments on the justification material (Enclosure 2).*
4. Comments should be as specific as possible, including a reason/explanation for the comment and, where applicable, a proposed replacement text.
5. Each response return must be signed and dated by an appropriate person with the authority to authorise comments on behalf of the stated organisation.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



MAIN PAGE

1. ORGANISATION COMMENTING

Organisation Name:	Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.	
Contact Name: ¹	John Banks	
Contact Address:	CAA House 45-59 Kingsway London WC2B 6TE	
Telephone/Fax:	+44 20 7453 6532	+44 20 7453 6556
E-mail Address:	john.banks@caa.co.uk	

2. GENERAL RESPONSE²

Acceptable without amendment:

Acceptable but would be improved with amendments:

Not acceptable but would be acceptable with amendments:

Not acceptable under any circumstances:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

3. SPECIFIC COMMENTS: See pro forma over page.

4. COMPOSITION OF RESPONSE

This response consists of the following:

This Page **PLUS** (enter number) attached comments sheets.

5. ASSOCIATION OF NAME WITH COMMENTS:

I do **not** agree to my name/organisation being associated with the comments provided.³

6. VALIDATION

Name: Mr A Knill

Position: Hd Surveillance & Spectrum Management, Directorate of Airspace Policy.

Signature: <<original signed>>

Date: 4 May 10

¹ This is the person who is to be contacted directly to discuss or clarify the submitted comments. A single point of contact is requested.

² Show your overall acceptance position **on Enclosure 1** by an 'X' in the appropriate response box.

³ Comments will be published with reference to their source unless a specific request is made **not** to do.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁴

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **of**

Paragraph Reference (Article/Recital etc):

Comment:

As currently defined 'accuracy' is referred to the degree of conformity at the time the data is used. It is only possible to guarantee accuracy at the time the data is processed.

Reason(s) for Comment:

The service provider will be unable to guarantee 'accuracy' on certain data items transferred from their systems as the time at it will be used will not be known.

Proposed Change/Text (where applicable):

Art 2(1) – 'accuracy' means the degree of conformity of the derived value of a data item with its actual value at the time the data is measured, extrapolated or decoded.

⁴ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁵

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

2

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 2(15)
Annex I Para 2.2

Comment:

As currently defined 'horizontal position error' gives rise for confusion as applied in Paragraph 2.2 of Annex I. It is unclear whether the evaluation of the horizontal position accuracy defined in Paragraph 2.2 is intended to include an element due to the latency of the surveillance system regardless of whether the horizontal position is time stamped.

Reason(s) for Comment:

It is unclear whether the evaluation of the horizontal position accuracy defined in Paragraph 2.2 is intended to include an element due the surveillance system latency. If it is not, it is proposed to change the definition of 'horizontal position error' as below.

Proposed Change/Text (where applicable):

Art 2(15) – 'horizontal position error' means the difference between the aircraft's actual 2D position and the 2D position reported at the output of the surveillance system.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁶

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

3

Of

20

Paragraph Reference (Article/Recital etc):

Art 5

Comment:

The UK fully supports the provisions for spectrum protection articulated in Article 5 and would point out that use of military IFF needs to be taken into consideration in respect of spectrum protection.

Art 5(2) appears unnecessarily prescriptive and may not provide optimum levels of spectrum efficiency.

Reason(s) for Comment:

The 1030/1090 MHz radio environment is shared between civil SSR and military IFF and interactions can occur between both which can reduce system availability.

We consider that the provisions of Art 5(1) and 5(3) are sufficient to allow the necessary coordination procedures to be developed that will provide both spectrum efficiency and an environment free from harmful interference.

Proposed Change/Text (where applicable):

Delete Art 5(2).

⁶ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁷

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

4

Of

20

Paragraph Reference (Article/Recital etc):

Art 6(2)

Comment:

The article erroneously refers to Annex IV Part B paragraph 3 item (a) to (x).

Reason(s) for Comment:

Editorial comment

Proposed Change/Text (where applicable):

Amend text in Art 6(2) from 'Annex IV Part B paragraph 3 item (a) to (x)' to 'Annex IV Part B paragraph 2 item (a) to (t)'.

⁷ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁸

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

5

Of

20

Paragraph Reference (Article/Recital etc):

Annex IV Part B

Comment:

Annex IV Part B Para 14 erroneously refers to paragraph 12.

Reason(s) for Comment:

Editorial comment.

Proposed Change/Text (where applicable):

Change text in Annex IV Part B Para 14 from '...paragraph 12...' to '...paragraph 13...'

⁸ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET⁹

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

6

Of

20

Paragraph Reference (Article/Recital etc):

Art 6(2)

Comment:

Transponder maintenance requirements should align with EASA certification material and should be less prescriptive. Further, consideration should be given to whether Art 6(2) is necessary as maintenance requirements are included within EASA certification material.

Reason(s) for Comment:

The requirement for a 2-year maintenance check is at variance with EASA certification material, JAA TGL 13 Rev 1 (to be replaced by EASA AMC 20-18), EASA AMC 20-13 and EASA AMC 20-24. These state only that maintenance tests should include a periodic verification check. The prescriptive approach proposed in the IR will not serve the best interests of industry and innovation.

Proposed Change/Text (where applicable):

Art 6(2) "Operators shall ensure that a check is performed periodically in line with the Design Authority's Instruction for Continued Airworthiness (ICA), and whenever an anomaly is detected....."

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁰

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

It would be of value to provide a maximum extended squitter rate in accordance with ICAO Annex 10.

Reason(s) for Comment:

Assists with the delivery of spectrum protection needs in accordance with Art 5.

Proposed Change/Text (where applicable):

Annex IV Part B – new paragraph “Extended squitter rate shall be in accordance with that permitted in ICAO Annex 10 Volume IV, Fourth edition including amendment 84, paragraph 3.1.2.8.6.4.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹¹

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

8

Of

20

**Paragraph Reference
(Article/Recital etc):**

Annex IV
Part C

Comment:

Current EASA means of compliance for enhanced surveillance only requires that barometric pressure setting should be provided where readily available. It is recommended that EASA be requested to provide the necessary amendment to AMC 20-13 to enable certification of this parameter to be fully delivered.

Reason(s) for Comment:

Barometric pressure setting requirement requires alignment with EASA AMC 20-13 to facilitate certification.

Proposed Change/Text (where applicable):

None

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹²

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

A study is required to establish whether older aircraft that fall within the criteria where the carriage of ADS-B is required are capable of providing the complete data set. If they are not an exemption process may be necessary.

Reason(s) for Comment:

Similar to the EHS exemption available for older aircraft described in Art 12(1), it is likely that some older aircraft will not be able to provide all the ADS-B data required at Annex IV Part B Para 2. Typical examples would be the availability of MCP/FCU selected altitude and barometric pressure setting.

Proposed Change/Text (where applicable):

Depending on the outcome of further study, a new paragraph may be required in Art 12 to read:

“Without prejudice to Article 7, aircraft with a first certificate of airworthiness issued before 10 January 2013 that have either a maximum take off mass in excess of 5700kg or a maximum cruising true airspeed greater than 250 knots that do not have the complete set of parameters detailed in Annex IV part B available on a digital bus on-board the aircraft may be exempted from complying with the requirements of Article 4(8).”

¹² This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹³

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **of**

Paragraph Reference (Article/Recital etc):

Comment:

Annex IV Part A Para 6 calls for a specific equipment MTBF. If this requirement is justified a supporting specification and means of compliance will need to be developed.

Reason(s) for Comment:

Annex IV Part A Para 6 calls for a specific equipment MTBF which does not appear to be required by ICAO Annexes, EUROCAE/RTCA performance specifications or EASA means of compliance.

Proposed Change/Text (where applicable):

No change necessary if published MTBF values are required to deliver the necessary levels of interoperability. Otherwise it is proposed that Para 6 should be deleted.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁴

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

11

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 2

Comment:

The definitions "accuracy", "availability", "continuity", "integrity", "Co-ordinated Universal Time" and "aircraft identification" are considered unnecessary as they are already available in reference documentation.

Reason(s) for Comment:

The definitions are contained in ICAO Doc 9713 'International Civil Aviation Vocabulary'. A reinterpretation of standard terms may lead to ambiguity.

Proposed Change/Text (where applicable):

Delete definitions "accuracy", "availability", "continuity", "integrity", "Co-ordinated Universal Time" and "aircraft identification" from Art 2.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁵

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

12

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 4(5)

Comment:

In view of the demanding timescales, we seek assurance that airframe manufacturers will be in a position to deliver the specified ADS-B capability on all new aircraft with a first certificate of airworthiness issued on or after 10 January 2013.

Reason(s) for Comment:

Whilst supporting the intention of the regulation we would wish to be assured that the proposed timescales are fully achievable.

Proposed Change/Text (where applicable):

None.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁶

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

13

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 3(1) & 3(2)

Comment:

The requirement for ANSPs for establishing separation criteria in airspace under their responsibility should be removed from the Article.

Reason(s) for Comment:

This falls outwith the requirement to deliver performance and interoperability of surveillance for SES.

Proposed Change/Text (where applicable):

Delete Art 3(1)

Change Art 3(2) to read:

“Air navigation service providers shall ensure that systems referred to in Article 1(2) (b) to (d) are deployed as necessary to support the separation minima specified for the airspace under their responsibility.”

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁷

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

14

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 12

Comment:

The SPI IR makes provision for exemptions and applicability. We seek assurance that the exemption process is consistent with the approach used in other EU regulations such as those of EASA.

Reason(s) for Comment:

Consistency of regulation.

Proposed Change/Text (where applicable):

None

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁸

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

Paragraphs 4 and 5 on Annex IV Part A should be combined. Likewise paragraphs 13 and 14 of Part B and 3 and 4 of Part C.

Reason(s) for Comment:

Linkage of these paragraphs will more accurately convey the intended requirement.

Proposed Change/Text (where applicable):

Annex IV

Delete Paragraphs A3, B13, C3

Add the sentence "Other data items may be made available to the transponder." at the beginning of paragraphs A4, B14 and C4.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET¹⁹

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

16

Of

20

**Paragraph Reference
(Article/Recital etc):**

Art 8(3)
Annex VI

Comment:

We do not believe the requirements referred to in Annex VI are safety requirements. Safety requirements can only be defined by the ANSP in relation to the service being provided. Annex VI contains a set of regulatory requirements to be considered during a safety assessment.

Reason(s) for Comment:

Consistency across regulations.

Proposed Change/Text (where applicable):

Change Art 8(3) to read "During the assessments identified in paragraphs 1 and 2, the requirements specified in Annex VI shall be taken into consideration."

Change Annex VI title to read "Requirements referred to in Article 8(3)"

Delete the phrase "shall be considered as safety requirements" in Annex VI paragraphs 2 to 7 inclusive.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET²⁰

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

We wish to make the Commission aware that due to the necessary alignment of international (non-European) equipment programmes and due to other procurement constraints on older aircraft, a small proportion of UK State aircraft will not be compliant with the requirements of Art 7(3) by 1 January 2017. Consequently the UK will be seeking exemptions in accordance with Art 7(4).

Reason(s) for Comment:

Information only.

Proposed Change/Text (where applicable):

None.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET²¹

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

We recommend the deletion of this paragraph.

Reason(s) for Comment:

The data in paragraph 10 cannot be used operationally without a supporting quality indicator. Further, this particular requirement is not included in DO-260B/ED-102A.

Proposed Change/Text (where applicable):

Delete paragraph 10.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET²²

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

19

Of

20

**Paragraph Reference
(Article/Recital etc):**

Annex IV Part B
Paragraphs 13 & 14

Comment:

On the assumption that some aircraft will be exempted from the ADS-B carriage requirements on the basis that they are not technically capable of delivering all the required data, we seek clarification of whether they will be required to cease the transmission of uncertified ADS-B data through modification to their existing avionics equipment.

We would also point out that new generation military IFF systems will be transmitting data via the equivalent of extended squitter and will not subject to the same certification processes as civil aircraft.

Reason(s) for Comment:

A significant number of existing aircraft are already transmitting uncertified ADS-B data and some beneficial use could be made of certain data elements.

Other unsolicited military airborne transmissions will be issued from flights operating under the circumstances detailed in Art 1(3).

Proposed Change/Text (where applicable):

None.

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Surveillance Performance and Interoperability Requirements**

Enclosure 5



COMMENTS SHEET²³

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No.

20

Of

20

Paragraph Reference (Article/Recital etc):

Annex IV Part B
Paragraph 2(s)

Comment:

“Millibars” should more correctly read “hectoPascals.”

Reason(s) for Comment:

Editorial.

Proposed Change/Text (where applicable):

Annex IV Part B Paragraph 2(s) – change “millibars” to read “hectoPascals.”

²³ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Aircraft Identification**

Enclosure 6



Please return this response sheet by **05 May 2010** to:

Mr Jean-Luc GARNIER,
CND Deputy Director
for Single European Sky Implementation,
EUROCONTROL,
Rue de la Fusée, 96,
B – 1130 BRUSSELS,
Belgium

or by E-mail to sesframework@eurocontrol.int

or by fax to +322 729 5190

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: **Draft implementing rule on Aircraft Identification**
Enclosure 6



MAIN PAGE

1. ORGANISATION COMMENTING

Organisation Name:	Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.	
Contact Name: ¹	John Banks	
Contact Address:	CAA House 45-59 Kingsway London WC2B 6TE	
Telephone/Fax:	+44 20 7453 6532	+44 20 7453 6556
E-mail Address:	john.banks@caa.co.uk	

2. GENERAL RESPONSE²

Acceptable without amendment:

Acceptable but would be improved with amendments:

Not acceptable but would be acceptable with amendments:

Not acceptable under any circumstances:

<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>

3. SPECIFIC COMMENTS: See pro forma over page.

4. COMPOSITION OF RESPONSE

This response consists of the following:

This Page **PLUS** (enter number) attached comments sheets.

5. ASSOCIATION OF NAME WITH COMMENTS:

I do **not** agree to my name/organisation being associated with the comments provided.³

6. VALIDATION

Name: Mr A Knill

Position: Hd Surveillance & Spectrum Management, Directorate of Airspace Policy.

Signature: <<original signed>>

Date: 4 May 10

¹ This is the person who is to be contacted directly to discuss or clarify the submitted comments. A single point of contact is requested.

² Show your overall acceptance position on Enclosure 1 by an 'X' in the appropriate response box.

³ Comments will be published with reference to their source unless a specific request is made **not** to do.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft implementing rule on Aircraft Identification

Enclosure 6



COMMENTS SHEET⁴

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

There is a small discrepancy in the definition 'aircraft identification' when compared to the draft SPI IR.

Reason(s) for Comment:

A common definition should be applied across all Regulations.

Proposed Change/Text (where applicable):

Art 2(1) – “aircraft identification means a group of letters, figures or a combination thereof which is either identical to, or the coded equivalent of, the aircraft call sign to be used in air-ground communications, and which is used to identify the aircraft in ground-ground air traffic services communications.”

⁴ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft implementing rule on Aircraft Identification

Enclosure 6



COMMENTS SHEET⁵

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

The conspicuity code selected for the assignment to aircraft whose identity is established using the downlinked aircraft identification should be used solely for that purpose.

Reason(s) for Comment:

In accordance with the justification material the SSR code is assigned for the benefit of any adjacent centres that need conspicuity and situational awareness on those flights where the downlinked aircraft identification has been confirmed as being correct.

Proposed Change/Text (where applicable):

Amend Art 3(6)(c) to read 'a conspicuity code is agreed with other Member States for assignment **solely** to aircraft where individual aircraft identification is established by using downlinked aircraft identification.'

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CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft implementing rule on Aircraft Identification

Enclosure 6



COMMENTS SHEET⁶

Organisation Name: Consolidated UK response on behalf of the Civil Aviation Authority, Ministry of Defence and NATS En-Route Ltd.

Form No. **Of**

Paragraph Reference (Article/Recital etc):

Comment:

There is an implication that there may be occasion to change the downlinked aircraft identification in flight. If this is the case the capability should be included within either this Regulation or the SPI IR.

Reason(s) for Comment:

Not all aircraft have the capability to change the downlinked aircraft identification in flight.

Proposed Change/Text (where applicable):

If there is a requirement to be able to change the downlinked aircraft identification in flight it should be a requirement of this Regulation or the SPI IR. Further, to aid clarity the term 'service provider' in Art 7(6) should be replaced with 'air traffic service provider'.

If there is not a requirement to be able to change the downlinked aircraft identification in flight the words 'unless requested by the service provider' should be deleted from the text of Art 7(6).

⁶ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.