



Comment-Response Document (CRD) 2021-05

RELATED NPA: 2021-05 — ED DECISION 2021/014/R — RMT.0476 (SUBTASK 3)

24.11.2021

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1. Summary of the outcome of the consultation

Please refer to Section 2.4 of the Explanatory Note to ED Decision 2021/014/R¹.

¹ <https://www.easa.europa.eu/document-library/agency-decisions>



2. Individual comments and responses

In responding to the comments, the following terminology is applied to attest EASA's position:

- (a) **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.
- (b) **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.
- (c) **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.
- (d) **Not accepted** — EASA does not agree with the comment or proposed change.

(General Comments)

-

comment	8	comment by: <i>LBA</i>
	LBA has no comments	
response	Noted	

comment	12	comment by: <i>IFATCA</i>
	We fully support the decision that clearances and instructions are solely a matter of ATC. These clearances can only be relayed, as stipulated in the upcoming ATS.TR.305. This means that clearances and instructions must continue to be marked as not eligible for use in AFIS/FIS.	
response	Noted	

comment	13	comment by: <i>IFATCA</i>
	While this may be out of scope for this NPA, we propose to introduce UAS-phraseology as soon as possible, for example to establish contact and receive a clearance with/from ATC in a control zone.	
response	Noted Appropriate phraseology for air-ground voice communication between ATS units and UAS pilots will be introduced via RMT.0230 'Introduction of a regulatory framework for the operation of unmanned aircraft systems and for urban air mobility in the European Union aviation system' ² .	

comment	32	comment by: <i>IFATCA</i>
	GENERAL FLIGHT PLAN: IFATCA suggests additional phrases: “*CANCELLING/CLOSING MY FLIGHT PLAN” and “FLIGHT PLAN CANCELLED/CLOSED AT (time)” for FIS/AFIS.	

² <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0230-0>

response	<p>Not accepted</p> <p>As the cancellation and/or closure of flight plans are/is addressed at national level, as stipulated in point SERA.4020, the introduction of the phraseologies for the scenario described in the proposal might unintentionally impact on the existing local practices. Moreover, introducing such phraseologies might support the incorrect perception that a flight plan may be cancelled after departure or closed before landing.</p> <p>In general, it is considered that, when applicable, such communication might be safely undertaken by using plain language as is currently the practice.</p>
comment	<p>95 comment by: <i>LFV Sweden</i></p> <p>LFV Sweden have no comments on the entire proposed amendment 2021-05. Rgds, Peter Rusk Senior ATM Expert LFV, Operations, Safety Department</p>
response	Noted
comment	<p>137 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>Timeline / to short time given for implementation of the AFIS phraseology</p> <p>Sweden is in general positive to a harmonized AFIS phraseology at a common European level as this is beneficial for flight safety as well as for the understanding of AFIS among flight crews and operators, especially when it comes to operations by crews from other member states.</p> <p>However, the time frame in NPA 2021-05 does not seem to a sufficient degree take into account that Sweden today has established standardized rules for AFIS-phraseology in both the Swedish and English language. The Competent Authority will now (due to the tight timeline in this NPA) need to revise national legislation in very short time.</p> <p>Sweden requires language proficiency endorsement in both the Swedish and the English language (for AFIS and ATCO).</p> <p>In addition there are 11 certified ATM/ANS providers (certified according to (EG) 550/2004/(EU) 2017/373), that provides AFIS at 13 airports in Sweden who will be affected by this NPA.</p> <p>Our AFIS providers need to implement this new regulation and the updated national regulation into their management systems / handbooks and thereafter train their AFIS-operators (total number 48) also in an extreme short manner of time.</p> <p>Sweden's opinion is that the timeframe for this NPA is too short. We see difficulties to implement this NPA within the suggested timeframe. Our opinion is that this short timeframe could have a negative effect on the level of flight safety.</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>



comment	<p data-bbox="379 241 432 271">142</p> <p data-bbox="986 241 1380 271">comment by: <i>European Air Cargo</i></p> <p data-bbox="379 300 1388 400"><i>The following comments have been noted in the review of EASA’s NPA 2021-05 (Standardised European rules of the air — Introduction of radiotelephony for the provision of aerodrome flight information service (AFIS) (Subtask 3))</i></p> <p data-bbox="379 443 1388 544">In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESSU will not be able to implement the changes that will be required locally, due to lack of time</p> <p data-bbox="379 551 480 580">Such as:</p> <ul data-bbox="379 586 991 687" style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p data-bbox="379 694 1388 795">The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA’s proposal may adversely affect flight safety.</p> <p data-bbox="379 801 1043 831">Proposal for a new period for introduction is Q3 2022.</p> <p data-bbox="379 873 1388 1043">When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p data-bbox="379 1050 1043 1079">Proposal for a new period for introduction is Q3 2022.</p>
response	<p data-bbox="379 1111 496 1140">Accepted</p> <p data-bbox="379 1146 1388 1247">Considering the publication date of ED Decision 2021/014/R and the time required to ensure the appropriate implementation of its Annex by all affected organisations, the applicability date is set on 1 December 2022.</p>
comment	<p data-bbox="379 1317 432 1346">164</p> <p data-bbox="959 1317 1380 1346">comment by: <i>FLCH Aviation Consult</i></p> <p data-bbox="379 1375 927 1404">A general comment to the NPA as presented:</p> <p data-bbox="379 1447 1388 1509">It's fully understood and acknowledged that FIS/AFIS phraseology is introduced in the EU Regulations</p> <p data-bbox="379 1516 1388 1579">This means that relevant amendments, necessary for that specific purpose, are accepted.</p> <p data-bbox="379 1621 1388 1684">However, all other proposed amendments that are not strictly necessary for inclusion due to the inclusion of FIS/AFIS phraseology, should be avoided/skipped.</p> <p data-bbox="379 1727 1388 1865">The reason for this is a principle objective/aim not to have an EU phraseology section which differs from the ICAO phraseology section, and furthermore that many of the proposed amendments that are not linked to the inclusion of FIS/AFIS phraseology are not considered safety related amendments, rather editorial amendments.</p> <p data-bbox="379 1908 1388 1971">For these editorial amendments EASA should coordinate with ICAO in order to have a uniform, or as uniform as can be, phraseology section.</p>

response	<p>Noted</p> <p>The comment does not specify which elements in the proposed phraseologies are not acceptable, and for what reasons.</p> <p>The existing phraseologies in Appendix 1 AMC1 SERA.14001 are almost entirely based on ICAO PANS-ATM phraseologies; the few additions, including those proposed with NPA 2021-05, are established for consistency with the EU regulatory framework and practices. They also take into account the international developments for specific provisions regarding this service (e.g. the ICAO AFIS Manual).</p>
comment	<p>210 comment by: <i>Danish Civil Aviation and Railway Authority</i></p> <p>We welcomes the introductions of FIS/AFIS phraseology in the EU regulations. It is seen as relevant and necessary for specific purposes.</p> <p>However other proposed amendments that are not strictly necessary due to the inclusion of FIS/AFIS phraseology should be avoided. It is seen as a key principle and aim not to have different EU and ICAO provisions for phraseology. Some of the proposed amendments are not considered safety related amendments and should rather have been coordinated with ICAO in order to achieve a harmonised implementation of changes to phraseology.</p>
response	<p>Noted</p> <p>Please see the response to comment #164.</p>
comment	<p>212 comment by: <i>FFA EUR</i></p> <p>FFA-EUR appreciates the work done by EASA to deliver a set of AFIS RT phraseology, in order to ensure unambiguous air ground communication, thus increasing safety</p>
response	<p>Noted</p>
comment	<p>226 comment by: <i>Fintraffic Air Navigation Services</i></p> <p>As a general comment to the NPA our opinion is that a specified list of approved/non-approved phraseology to be used by AFIS/FIS officers is not necessary.</p> <p>It is important to distinguish the roles and responsibilities between different kinds of ATS services as specified in regulations. All standard phraseology should be common to all airspace users and ATS personnel to be used according to each individual's competency and training. The individual phrases do not need to be categorised between the services in regulatory/AMC level.</p>
response	<p>Noted</p> <p>EASA confirms that it is necessary to determine the applicability of each phraseology to the various ATS. It is underlined that the amended Appendix indicates when each phraseology is applicable to either ATC or FIS/AFIS, or both.</p>
comment	<p>242 comment by: <i>Europe Air Sports</i></p>



response	<p>Europe Air Sports (EAS), the organisation representing sports, recreational and general aviation in Europe, appreciates the efforts by EASA to improve the RT phraseology to increase safety.</p> <p>Noted</p>
comment	<p>249 comment by: <i>Europe Air Sports</i></p> <p>Note: General CRT problem, not related to this particular NPA.</p> <p>We regret to have to report persistent problems in using the CRT commenting tool: Saving of entered text very often leads to an error and the text is unsaved. A logout / login is then required. Sometimes several of these cycles are needed before the comment gets saved. This has continued for several different NPAs.</p>
response	<p>Noted</p> <p>The issue with the CRT (both for this and other NPAs) has been reported to the competent EASA department for investigation and resolution.</p> <p>We sincerely apologise for the inconvenience caused.</p>
comment	<p>279 comment by: <i>FOCA Switzerland</i></p> <p>General remark/Question:</p> <p>EASA does not provide phraseology for the management of the movement of vehicles and persons on the manoeuvring area which the competent authorities are free to prescribe in the context of AFIS (c.f. ATS.TR.305 [f]). FOCA assumes that the phraseology should be determined by the competent authorities which will be free to use certain elements of the ATS phraseologies provided in Appendix I to AMC1 SERA.14001 (incl. phraseologies applicable to ATC only, like e.g. provided in Sections 1.4.7 and 1.4.8). FOCA asks EASA to kindly confirm this understanding or to provide further explanation.</p>
response	<p>Noted</p> <p>EASA confirms that the assumption in the comment is correct, and wishes to underline that the determination of phraseologies for the movement of vehicles and persons on the manoeuvring area in the context of AFIS — but also in the context of aerodrome ATC service — is to be established locally, and that the applicable regulatory framework (see point SERA.14090(a) concerning the use of the term ‘proceed’ instead of the term ‘taxi’) shall be taken into account.</p>

1.1. How this NPA was developed

p. 3

comment	<p>144 comment by: <i>European Air Cargo</i></p> <p>Section 1.1.9</p> <p>The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.</p>
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	<p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	<p>Not accepted</p> <p>With regard to the comment on Section 1.1.9: Not accepted.</p> <p>It must be noted that the phraseologies in the section are exclusively purposed for ATC service provision and communication with controlled flights for specified circumstances (i.e. temporarily suspended delivery of position reports by the pilot). Inasmuch pilot reports would improve the awareness of the FIS, it is considered that phraseologies related to instructions to report points or to stop position reporting would be the prerogatives of ATC. Operating in uncontrolled airspace comes with requirements for pilots to report their actions to raise the necessary awareness to other traffic. It is not exclusively FIS responsibility to provide collision hazard information. Phraseologies for position reporting in general are provided in Section 1.1.10, applicable to both ATC service and flight information service (FIS).</p> <p>With regard to the comment on Section 1.1.15: Noted.</p> <p>It must be noted that an AFIS Officer is not entitled to assign an RNAV procedure, but only to provide information. The context described in the Section is applicable to ATC service only.</p>

1. About this NPA

p. 3

comment	<p>181 comment by: <i>JP DELMAS</i></p> <p>Thank You for the opportunity ot comment this NPA.</p>
response	Noted
comment	<p>215 comment by: <i>AFIS DEPARTMENT</i></p> <p>It is very important for AFIS to have a regulatory framework and a comprehensive set of AFIS RT phraseologies for air–ground voice communications between pilots and ATS</p>
response	Noted

2.1. Why we need to amend the rules - issue/rationale

p. 5

comment	<p>250 comment by: <i>CAA Norway</i></p>
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	<p>CAA Norway appreciate this initiative which is aiming to achieve unambiguous air-ground communication especially for FIS and AFIS. This harmonisation will definitely contribute to even the diversity in Europa, and increase the level of safety overall when the services are provided in a more standardised way and harmonised.</p> <p>This is especially valuable for AFIS and will contribute in a positive way for pilots, thus increasing safety.</p> <p>Norway has (along with our neighbouring countries) a long tradition for providing AFIS and have over the last decades evolved the service to a high level of maturity.</p> <p>With advanced national legislation/requirements related to competence (with periodic evaluation), medical fitness, tools and infrastructure the provision of AFIS in Norway hold a high standard, as do the service in the other Nordic countries.</p> <p>The above mentioned national maturity has over time led to a need for a few national additions to the existing ICAO/EASA procedures/regulations, phraseology included.</p>
response	Noted

2.2. What we want to achieve - objectives	p. 6
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comment	<p>4 comment by: <i>Czech Technical University</i></p> <p>We fully support this proposal; it brings much needed clarifications in the AFIS phraseology.</p>
response	Noted

comment	<p>65 comment by: <i>Skovde Airport</i></p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS Skövde will not be able to implement the changes that will be required locally, due to lack of time.</p> <p>Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA’s proposal may adversely affect flight safety.</p>
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	Proposal for a new period for introduction is Q3 2022.
response	Accepted Please see the response to comment #142.
comment	66 comment by: <i>Skovde Airport</i> When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS. Proposal for a new period for introduction is Q3 2022.
response	Accepted Please see the response to comment #142.
comment	80 comment by: <i>Hagfors Airport</i> In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS XX will not be able to implement the changes that will be required locally, due to lack of time Such as: <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety. Proposal for a new period for introduction is Q3 2022.
response	Accepted Please see the response to comment #142.
comment	81 comment by: <i>Hagfors Airport</i> When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS. Proposal for a new period for introduction is Q3 2022.
response	Accepted Please see the response to comment #142.
comment	96 comment by: <i>AB Dalaflyget</i>



In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESKM will not be able to implement the changes that will be required locally, due to lack of time

Such as:

- review and update of operational manual,
- training of AFISO, and
- simulator training.

The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.

Proposal for a new period for introduction is Q3 2022.

When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.

Proposal for a new period for introduction is Q3 2022.

response Accepted
Please see the response to comment #142.

comment 109 comment by: Hagfors Airport

In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, **ATS ESOH** will not be able to implement the changes that will be required locally, due to lack of time

Such as:

- review and update of operational manual,
- training of AFISO, and
- simulator training.

The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.

Proposal for a new period for introduction is Q3 2022.

response Accepted
Please see the response to comment #142.

comment 110 comment by: Hagfors Airport

When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.

Proposal for a new period for introduction is Q3 2022.

response Accepted
Please see the response to comment #142.



comment	<p>124 comment by: <i>Härjedalen Sveg Airport</i></p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESND will not be able to implement the changes that will be required locally, due to lack of time</p> <p>Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>
comment	<p>125 comment by: <i>Härjedalen Sveg Airport</i></p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>
comment	<p>141 comment by: <i>Hemavan Tärnaby Airport AB</i></p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS Hemavan Tärnaby Airport will not be able to implement the changes that will be required locally, due to lack of time</p> <p>Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted</p>

Please see the response to comment #142.

comment

145

comment by: *European Air Cargo*

The following comments have been noted in the review of EASA's NPA 2021-05 (Standardised European rules of the air — Introduction of radiotelephony for the provision of aerodrome flight information service (AFIS) (Subtask 3))

In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESSU will not be able to implement the changes that will be required locally, due to lack of time

Such as:

- review and update of operational manual,
- training of AFISO, and
- simulator training.

The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.

Proposal for a new period for introduction is Q3 2022.

When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.

Proposal for a new period for introduction is Q3 2022.

response

Accepted

Please see the response to comment #142.

comment

148

comment by: *South Lapland Airport*

In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESNV will not be able to implement the changes that will be required locally, due to lack of time

Such as:

- review and update of operational manual,
- training of AFISO, and
- simulator training.

The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.

Proposal for a new period for introduction is Q3 2022.

response

Accepted

Please see the response to comment #142.

comment

150

comment by: *South Lapland Airport*

response	<p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p> <p>Accepted Please see the response to comment #142.</p>
comment	<p>165 comment by: AB Dalaflyget</p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESKM will not be able to implement the changes that will be required locally, due to lack of time Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted Please see the response to comment #142.</p>
comment	<p>166 comment by: AB Dalaflyget</p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted Please see the response to comment #142.</p>
comment	<p>180 comment by: Lycksele flygplats AB</p> <p>Time to implement</p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS ESNL will not be able to implement the changes that will be required locally, due to lack of time. Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training.

response	<p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p> <p>Accepted</p> <p>Please see the response to comment #142.</p>
comment	<p>182 comment by: <i>Lycksele flygplats AB</i></p> <p>Airspace users</p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>
comment	<p>204 comment by: <i>Pajala Airport</i></p> <p>In the event of a decision on the proposed regulation in accordance with NPA 2021-05 with the effective of date 2022-01-27, ATS Pajala will not be able to implement the changes that will be required locally, due to lack of time</p> <p>Such as:</p> <ul style="list-style-type: none"> • review and update of operational manual, • training of AFISO, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA's proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>
comment	<p>208 comment by: <i>Grafair Flight Management</i></p> <p>Grafair will not be able to implement the changes that will be required, due to lack of time</p> <p>Such as:</p>

response	<ul style="list-style-type: none"> • review and update of operational manual, • training, and • simulator training. <p>The timetable for the change has been compressed, which has resulted in a concern that the implementation in accordance with EASA’s proposal may adversely affect flight safety.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
	<p>Accepted</p> <p>Please see response to comment #142.</p>
comment	<p>209 comment by: <i>Grafair Flight Management</i></p> <p>When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that we will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload for AFISO as well as the risk of misunderstandings as pilots do not have sufficient knowledge of the new standardized phraseology for AFIS.</p> <p>Proposal for a new period for introduction is Q3 2022.</p>
response	<p>Accepted</p> <p>Please see the response to comment #142.</p>

2.3. How we want to achieve it - overview of the proposals	p. 7
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comment	<p>1 comment by: <i>Aaltronav</i></p> <p>“EASA underlines that discussions during the NPA development indicated that this is still a controversial issue, as there are views that pilots of electrically powered aircraft should also use the term ‘MINIMUM FUEL’ instead of ‘MINIMUM ENERGY’ for harmonisation and simplicity purposes.”</p> <p>Directive 2014/94/EU of the European Parliament and of the Council of 22 October 2014 on the deployment of alternative fuels infrastructure (Text with EEA relevance) explicitly defines (‘[f]or the purpose of this Directive’) electricity as an alternative fuel in Article 2.</p> <p>At an international level, so does § 301 of the U.S. Energy Policy Act 1992.</p> <p>Additionally, the term ‘energy’ as used in an aeronautical context encompasses three different kinds of energy: kinetic (speed), potential (altitude) and chemical / electrical (fuel). ‘Minimum energy’ could be misinterpreted as implying that an aircraft is in a dangerously low mechanical energy state, a situation of much more immediate concern.</p>
response	<p>Noted</p> <p>Regulation (EU) No 923/2012 (SERA) includes the definition of ‘minimum fuel’; moreover, point SERA.11012 prescribes the actions to be taken by pilots and air traffic controllers in case of minimum fuel and fuel emergency.</p>



It must be noted that such actions are not directly applicable to the provision of FIS, for which nonetheless shortage of fuel is a relevant contingency, and in particular for AFIS.

Commission Implementing Regulation (EU) 2021/1296, amending Regulation (EU) No 965/2012, was published on 5 August 2021, based on EASA Opinion No 02/2020 resulting from RMT.0573 (see <https://www.easa.europa.eu/document-library/regulations/commission-implementing-regulation-eu-20211296>). It will become applicable on 30 October 2022; EASA is currently finalising the related AMC and GM, which are planned for publication with an ED Decision by 2022/Q1.

With this new Regulation, in the context of Regulation (EU) No 965/2012, the term 'fuel' is replaced by 'fuel/energy' to accommodate operations with aircraft that use energy sources for propulsion other than conventional, hydrocarbon-based fuel. However, this has not led to a proposal to amend the radiotelephony phrases to be used in the given context (in particular to the phrases 'minimum fuel' and 'mayday mayday mayday fuel' to introduce the notion of 'energy').

This decision is justified by the need to ensure safety by the use of standardised phraseology worldwide in a determined contingency situation. EASA will consider any amendment to the currently existing radiotelephony phrases concerning minimum fuel, should ICAO introduce related amendments in the future.

Consequently, the text of the radiotelephony phrase in Section 1.1.3 of Appendix 1 AMC1 14001 remains unchanged, with its applicability extended also to FIS.

comment 201

comment by: IAOPA

7 This was considered particularly for the case of runway operations — one of the most safety-critical segments of aerodrome activities. The envisaged options included 'direct' information phrases like 'RUNWAY XX AVAILABLE FOR TAKE-OFF' and 'WARNING' phrases to be used for safety reasons like, for example, 'RUNWAY OCCUPIED' or 'AIRCRAFT IN SHORT FINAL'.

Even in examples or introductory text, the word Take-Off should not be used unless it has a direct link to the runway operation itself. Advice is to change it to '**RUNWAY XX AVAILABLE FOR DEPARTURE**'.

'AIRCRAFT IN SHORT FINAL' should be '**AIRCRAFT ON SHORT FINAL**'

response Noted

As indicated in the text in Section 2.3 of NPA 2021-05, the phrases 'RUNWAY XX AVAILABLE FOR DEPARTURE' and 'AIRCRAFT IN SHORT FINAL' were used as examples and are not included in Appendix 1 AMC1 SERA.14001.



comment	268	comment by: AESA/DSANA
	<p>We consider that the inclusion of the term MINIMUM ENERGY to indicate the nature of the aircraft propulsion to the ATS would be unnecessary at this moment, and our suggestion is that only MINIMUM FUEL should be considered for simplicity purposes. Anyway, If EASA is still considering necessary the introduction of this term maybe the expression could be supplemented with other extra words (i.e. ELECTRICAL) in order to accentuate the ATCO situational awareness referring to an electric aircraft is present trying to prevent unnespected reactions.</p>	
response	<p>Noted Please see the response to comment #1.</p>	

comment	278	comment by: FOCA Switzerland
	<p>Page 7, “Stakeholders are kindly invited to express their views on the proposal concerning Section 1.1.3 of Appendix 1” (minimum fuel/energy):</p> <p>From an ATS perspective, declaration of “minimum energy” instead of “minimum fuel” would be relevant if the reaction from ATS would be different (e.g. different information to be provided to RCC or local organisations). Provided that there is no difference in the reaction of the ATS unit, “minimum fuel” could be applied for simplicity purposes. Acknowledging the ongoing debate we would like to point out for information, however, that the EC has accepted for the OPS domains [Annex VII (Part-NCO) of Regulation (EU) No 965/2012] that “Sufficient fuel” is replaced by “sufficient electrical energy used for propulsion” and “amount of usable fuel” with “amount of electrical energy used for propulsion”.</p>	
response	<p>Noted Please see the response to comment #1.</p>	

Appendix 1 to AMC1 SERA.14001 General
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p. 9

comment	2	comment by: Bart Bzymek
	<p>Regarding to 1.4.5 Towing procedures</p> <p>add e) TOW AT OWN DISCRETION (similar with START UP PROCEDURES)</p> <p>STAND BY phrase should be used on both as well (1.4.4 c) and 1.4.5 d)</p> <p>Regarding to 1.4.7 Taxi instructions</p> <p>Consideration should be given to the possibility of introducing additional phraseology for the AFIS service regarding aircraft taxiing procedures. At airports where the service is divided during the day between ATC and AFIS, an important element is the use of phraseology attached to the taxiing of aircraft also for the AFIS service. Particular attention should be paid to the period of transfer of responsibilities between individual ATC / AFIS and AFIS / ATC units so that there is no doubt in which location on the maneuvering area a given aircraft is. Likewise, the</p>	



	<p>instructions (information) for clearing the runway for a given taxiway are important for the orderly and safe movement of the maneuvering area.</p> <p>Regarding to 1.4.8 Holding How could we stop an aircraft when it is required ???</p> <p>Regarding to 1.4.10 Preparation for take-off From time to time we need confirmation from pilots about readiness, b) REPORT WHEN READY [FOR DEPARTURE] is very helpfull in this situation.</p>
response	<p>With regard to the comment on Section 1.4.5: Not accepted</p> <p>This phraseology is intended for the control of the towing, in particular to the route along which it will be conducted at the moment the towing is ready to take place, and not about the timing.</p> <p>With regard to the comment on Section 1.4.7: Not accepted</p> <p>Section 2.3 of NPA 2021-05 and GM1 Appendix 1 AMC1 SERA.14001 clarify the principles of applicability of the provided phraseologies to either ATC service or FIS/AFIS.</p> <p>With regard to the comment on Section 1.4.8: Noted</p> <p>It is understood that the comment concerns the provision of AFIS. It is reminded that AFIS units may only issue information to support pilots in making the appropriate decisions for the safe conduct of flights. Requirements concerning the appropriate designation of ATS for the intended operations are provided in Regulation (EU) 2017/373 as amended by Regulation (EU) 2020/469.</p> <p>With regard to the comment on Section 1.4.10: Noted</p>
comment	<p>3 comment by: Czech Technical University</p> <p>1.1.3 Minimum fuel/energy</p> <p>We share the opinion that “MINIMUM FUEL” shall be kept for simplicity; “MINIMUM ENERGY” shall NOT be implemented.</p> <p><i>Rationale:</i></p> <p>“MINIMUM FUEL” is a well-recognized phrase. Since the Avianca Flight 52 crash in 1990, a significant effort has been made to achieve world-wide standardization and proper understanding. The introduction of a new phrase (especially when limited to European region and a certain aircraft type) would void this effort. Pilots may frequently switch between electrically powered and fossil fuel powered aircraft. Two different phrases put additional workload on a pilot (to choose a correct phrase) in a time critical situation. Additionally, the phrase “MAYDAY FUEL” (SERA.11012 (b) and ICAO Doc 4444 15.5.4 Note 3) would have to be changed as well. “MAYDAY ENERGY” sounds very odd and ambiguous: “energy” may refer to kinetic energy (possible speed problem), gravitational potential energy (altitude problem) or even mental energy (exhaustion).</p> <p><i>Trivia:</i></p>

	<p>The Cambridge Dictionary defines ‘fuel’ as ‘a substance that is used to provide heat or power, usually by being burned: ...Plutonium is a fuel used to produce nuclear energy...’</p> <p>An electrochemical cell is a substance that is used to provide heat or power, not by being burned like plutonium. The use of “MINIMUM FUEL” with reference to a battery powered aircraft is actually correct.</p>
response	<p>Accepted</p> <p>Please see the response to comment #1.</p>
comment	<p>5 comment by: AFIS</p> <p>Point 1.4.3 Starting procédures d) and f) Is it "ADVICES" ? or rather "advises"?</p>
response	<p>Noted</p> <p>Please see the response to comment #47.</p>
comment	<p>9 comment by: EASA Focal Point for AustroControl ANSP-issues</p> <p>On page 11, Par. 1.1.4:</p> <p>d) STAND BY FOR (unit call sign)(frequency) and g) Monitor (unit call sign)(frequency)</p> <p><u>Comment by Austro Control:</u> The distinction between the phrases "MONITOR (unit) (frequency)" and "STAND BY FOR (unit) (frequency)" is not fully clear, even after reading the corresponding notes, and there is a need for clarification as to exactly when or under what circumstances the phrases are to be used and how they differ from each other. The note for the phrase "MONITOR" refers to listening to a frequency on which information is broadcasted, which refers to an ATIS or VOLMET frequency. „MONITOR (unit) (frequency)“ is quite irritating though. Does „unit“ here mean a broadcast or an ATS-unit?</p> <p><u>Please, in that case also consider the existing document GM1 SERA.14045(b), in where the same issue might be applied to table S14-4, on page 156:</u></p> <p>It would be desirable to explain in a Guidance Material (GM) or another note by means of an example when to use "MONITOR (unit) (frequency) " and when to use "STAND BY FOR (unit)(frequency)". Also, it should be considered whether the table in SERA.14045 (b) should be adapted so that the phrase "STAND BY FOR" is included there in the same way as "MONITOR".</p>
response	<p>Not accepted</p> <p>The circumstances under which these phraseologies are to be used are described in the associated notes in the ‘Circumstances’ column in the Appendix, which with this proposal have been reorganised for clarity compared to the original ICAO provisions. It is acknowledged that the issue in the comment was raised also to ICAO in the past. Further clarification may be provided by EASA following a concrete outcome from</p>



ICAO, which at the moment is not available. This would include a possible amendment to point SERA.14045(b), which in any case could not be undertaken under the present rulemaking activity, which affects AMC and GM only.

comment 10

comment by: Jz

Page 22 : 1.3.2 S " MAINTAIN OWN SEPARATION;"

for AFIS, would be a discharge and insisting on the fact traffic has to maintain it's own separation as sequencing and separation is not provided by AFIS.

Page 22 : 1.3.3 A "HOLD VISUAL [OVER] (position), (or BETWEEN (two prominent landmarks));"

Would be interesting for AFIS to ask a VFR flight to maintain a position in an area for exemple if the circuit is saturated or in emergency conditions.

page 27 : 1.4.10 B, C, D "REPORT WHEN READY [FOR DEPARTURE];" " ARE YOU READY [FOR DEPARTURE]?;" "ARE YOU READY FOR IMMEDIATE DEPARTURE?"

Would be useful as phrasology for AFIS, not for departure sequencing, but to advise other traffic or departure ATC sector when ac is ready. To help ATC make approach or departure sequence.

Page 28 : 1.4.10 M, N "APPROVED, TAXI TO HOLDING POINT RUNWAY (number), INTERSECTION (designation or name of intersection)" "NEGATIVE, TAXI TO HOLDING POINT RUNWAY (number), INTERSECTION (designation or name of intersection);"

For certain airfield with limited taxi possibilities, if an holding point is for arrivals and another for departures, would help avoid face to face situations.

Page 29 : 1.4.11 E, G "HOLD POSITION, CANCEL TAKE-OFF I SAY AGAIN CANCEL TAKE-OFF (reasons);" "STOP IMMEDIATELY [(repeat aircraft call sign) STOP IMMEDIATELY];"

as here, we are not talking about flying aircraft, situation like a "go around" would be, is less dangerous and would help safety to ask an aircraft to stop departure in case of runway incursion or if smoke/fire is seen, a trafic is crossing the runway axis in the air etc..

Page 31 : 1.4.18 A "GO AROUND;"

Tricky situation for an AFIS, but how about, after 2 or 3 warnings about runway occupied and asking intentions of crew, pilot is tunnelizing and do not realize, to have a last resort tool by asking go around ? wouldn't law and justice say the AFIS did "no assistance to the person in danger" in case of accident ?

response

Not accepted

All the phraseologies mentioned relate to ATC service and not to AFIS.

Section 2.3 of NPA 2021-05 and GM1 Appendix 1 AMC1 SERA.14001 clarify the principles of applicability of the provided phraseologies to either ATC service or FIS/AFIS.

comment 36

comment by: ENAV

1.1.3 MINIMUM FUEL / ENERGY

response	<p>Even though information about the kind of propulsion could be useful, especially if the situation becomes an emergency it should be recognized that non definition for Minimum Energy is available and there is no certainty that the meaning of such word could be correctly interpreted by pilots and ATS.</p> <p>Noted Please see the response to comment #1.</p>
comment	<p>37 comment by: ENAV</p> <p>1.1.9 and 2.1.7 POSITION REPORTING <i>NEXT REPORT AT (significant point)</i> Phraseology daily used also in AFIS.</p> <p><i>c) RESUME POSITION REPORTING.</i> Sometimes pilots request to omit position reports and monitor the frequency, for instance when operating on circuits activity alone in the ATZ. For these situations is necessary to establish a standard phraseology to acknowledge (e.g. "ROGER") or a specific answer. (The same for Section 2.1.7 point d)).</p> <p>Position reporting can be expected when providing FIS. Asking to omit position reports because swapping to NORMAL OPERATIONS REPORT, for example, is a normal procedure in certain areas/routes/conditions. Moreover, asking for a report does not imply an ATC clearance. It should be noted that additional reports are included in FIS as per section 1.1.10.</p>
response	<p>Not accepted</p> <p>Position reports in uncontrolled airspace are an essential means to enable situational awareness for the flights concerned and support the function of FIS and to provide information on collision hazards to other aircraft. The case of flights informing the FIS/AFIS unit that they will omit position reports, when permitted, may be covered by the use of plain language. It is not expected that a Flight Information Centre (FIC) or an AFIS unit undertake to request flights to omit position reports, as this would configure as an instruction which is not within the competence of such units.</p> <p>Please see also the response to comment #144.</p>
comment	<p>38 comment by: ENAV</p> <p>1.1.10 ADDITIONAL REPORTS <i>a) REPORT PASSING (significant point);</i> "REPORT PASSING (<u>or REACHING, or LEAVING</u>) (significant point <u>or level</u>)".</p> <p>In this section should be added the phraseology to ask for the report of other pertinent information</p>
response	<p>Not accepted</p> <p>With regard to the scenario described in the context of the provision of ATC service, appropriate phraseologies are established in Section 1.1.2.</p>

The scenario to which Section 1.1.10 refers to is not applicable to the provision of FIS/AFIS.

The provision of other pertinent information, which may be of a wide variety, is covered by the principle that in the absence of a specified phraseology, plain language is to be used.

comment

39

comment by: ENAV

1.1.15 RNAV

Such kind of phraseology could be needed in case of AFIS units coordinating an IFR departure and needing to forward details to the APP/ACC concerning an aircraft's capabilities.

response

Not accepted

Please see the response to comment #144

comment

40

comment by: ENAV

1.2 ~~Area control~~ En-route air traffic services

No reason for the change; area control centre is defined (see general comment).

response

Not accepted

Please see the response to comment #198.

comment

41

comment by: ENAV

1.2.6 IF CLEARANCES CANNOT BE ISSUED IMMEDIATELY UPON REQUEST

EXPECT CLEARANCE (type of clearance) AT (time).

Such kind of phraseology could be needed in case of AFIS/FIS units coordinating an IFR clearance with an ACC/APP.

Such kind of phraseology has to be implemented also for AFIS. For instance, when AFIU relay the IFR "start-up and clearance" request to ATC unit and this one gives the clearance at a specific time or not before a certain period. The phraseology could be: "FROM (ATC unit) EXPECT CLEARANCE AT (or NOT BEFORE) (time)".

Furthermore has to be considered a standard phraseology in response to IFR "start-up and clearance" request, for example: "ROGER, COORDINATION IN PROGRESS WITH (ATC unit)".

response

Partially accepted

The scenario described is addressed in the newly introduced phraseologies in Section 1.2.10.

comment

42

comment by: ENAV



	<p>1.2.10 RELAYING CLEARANCES, INSTRUCTIONS AND INFORMATION</p> <p>a) (ATC unit) <i>CLEARs</i> (or <i>INSTRUCTs</i>) (or <i>INFORMs</i>) (details of the clearance, instructions, or information);</p> <p>“(ATC unit) <i>CLEARs</i> (or <i>INSTRUCTs</i>) (or <i>INFORMs</i>) (or <u>REQUESTs</u>) (details of the clearance, instructions, information or <u>request</u>)”.</p> <p>If ATC unit amends some parts of the given clearance (e. g. new flight level or squawk) is necessary to provide a standard phraseology, for example: “(ATC unit) <i>RECLEARs</i> see point a)”.</p>
response	<p>Not accepted</p> <p>The scenario described in the comment is considered to be covered by the term ‘INSTRUCTS’.</p>
comment	<p>43 comment by: ENAV</p> <p>1.3 Approach control services-Arrival and departure air traffic services</p> <p>Arrival and departure ATS it is not defined the meaning of approach control service is not controversial the title should be left untouched (see general comment)</p>
response	<p>Not accepted</p> <p>Please see the response to comment #40.</p>
comment	<p>44 comment by: ENAV</p> <p>1.3.2 APPROACH INSTRUCTION</p> <p>k) <i>REPORT RUNWAY [LIGHTS] IN SIGHT</i>;</p> <p>Phraseology daily used also in AFIU, especially for IFR approaching procedures during day and night. Another type of report to implement cloud be: “REPORT FIELD IN SIGHT” (The same for 2.2.4.5 point b)).</p> <p>p) <i>REPORT (significant point); [OUTBOUND, or INBOUND]</i>;</p> <p>As above.</p>
response	<p>Not accepted</p> <p>The use of the information described in the scenario by the AFIS unit is unclear.</p> <p>Section 1.1.10 provides phraseologies for ‘additional reports’, which are considered applicable to FIS.</p>
comment	<p>45 comment by: ENAV</p> <p>1.3.2 APPROACH INSTRUCTIONS</p> <p>Specific reports to be transmitted during an instrument procedure could be needed in case of an AFIS unit providing service at an airport opened to IFR traffic.</p>
response	<p>Not accepted</p> <p>The use by the AFIS unit of the information described in the scenario is unclear.</p> <p>Section 1.1.10 provides phraseologies for ‘additional reports’, which are considered applicable to FIS.</p>

comment	<p>46 comment by: ENAV</p> <p>1.3.3 HOLDING CLEARANCES Holding instructions over a visual reporting point might be issued, for example, when a unit providing FIS is coordinating traffic with an APP. This kind of instructions could be relayed to the aircraft on behalf of the APP should the traffic situation require it.</p>
response	<p>Noted Section 1.2.10 provides the phraseologies for the relay of instructions and clearances by ATC units, including holding clearances.</p>
comment	<p>47 comment by: ENAV</p> <p>1.4.3 STARTING PROCEDURES</p> <p><i>d) ATC ADVICES START-UP APPROVED</i> This form is not clear and may cause misunderstanding, better to use: "START-UP APPROVED BY (ATC unit)" or "(ATC unit) CLEARS YOURS START-UP". It is unclear; what ATC refers to in the phrase Start-up time procedures should be implemented where necessary to avoid congestion and excessive delays on the manoeuvring area or when warranted by air traffic flow management (ATFM) regulations. Start-up time procedures should be contained in local instructions and should specify the criteria and conditions for determining when and how start-up times shall be calculated and issued to departing flights. Once "the criteria and conditions for determining when and how start-up times shall be calculated and issued to departing flights" there is no exercise of ATC in approving the start-up ; furthermore there may be no ATC that advice at all.</p> <p><i>f) ATC ADVICES START-UP AT (time)</i> As above adding "AT (time)".</p> <p><i>g) EXPECT START-UP AT (time);</i> g) Phraseology useful also in AFIU. The form could be: "<u>FROM (ATS unit)</u> EXPECT START-UP AT (<u>or NOT BEFORE</u>) (time)".</p>
response	<p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>Avoiding congestion or delays on the manoeuvring area might be a justification for introducing start-up procedures at an aerodrome. It is rather unusual to have that as part of an AFIS aerodrome, as complexity and capacity should justify the implementation of aerodrome control. For ATFM introduced requirements, adherence to the CTOT is a pilot responsibility, in particular for uncontrolled aerodromes.</p>

When start-up clearances issued by ATC units for peculiar local scenarios are relayed to aircraft by AFIS units, the phraseologies established in Section 1.2.10 are to be used.

GM1 Appendix 1 to AMC1 SERA.14001 is also relevant.

The text of Section 1.4.3 is amended compared to the proposal in NPA 2021-05, and consequently the phraseologies therein are only applicable to aerodrome ATC service.

comment

48

comment by: ENAV

1.4.4 Pushback procedures

b) PUSHBACK APPROVED;

this is unclear, on the apron even the ATC does not pursue the objective of air traffic control service the AFIS

Pushback approval is not an ATC clearance/instruction

response

Noted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

Should the complexity of operations on the movement area dictate the establishment of pushback procedures, Member States should consider the establishment of appropriate aerodrome control, and apron management functions should be given.

Following thorough consideration, EASA confirms that pushback instructions are only applicable to the voice communication between pilots and ATC service. Consequently, Section 1.4.4 is amended to reflect the aforementioned scope of applicability.

comment

49

comment by: ENAV

1.4.5 Towing procedures

b) TOW APPROVED VIA (specific routing to be followed);

see comment at 1.4.4 b)

response

Noted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

When the complexity of operations on the movement area dictates the establishment of towing procedures, beyond the simple notification to the AFIS unit,



Member States should consider the establishment of appropriate aerodrome control and apron management functions.

EASA confirms that towing instructions are only applicable to the voice communication between pilots and ATC service. Specifically, it is reminded that the safety concerns about operations on the manoeuvring area should be addressed by FIS through the timely provision of clear and concise information.

comment

50

comment by: ENAV

1.4.7 TAXI PROCEDURES

In this section there is no trace of phraseology to be used in AFIU.

e) TAXI TO HOLDING POINT [number] [RUNWAY (number)] VIA (specific route to be followed) [TIME (time)] [HOLD SHORT OF RUNWAY number] (or CROSS RUNWAY number));

Phraseology useful also in AFIU.

i) TAXI VIA RUNWAY (number);

Phraseology useful also in AFIU

o) BACKTRACK;

Phraseology normally used also in AFIS.

response

Noted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide its services according to the principles and provisions established for that service.

Taxi instructions and clearances belong clearly and unambiguously to aerodrome ATC service. Specifically, it is reminded that the safety concerns about operations on the manoeuvring area should be addressed by FIS through the timely provision of clear and concise information.

When the complexity of operations on the manoeuvring area dictates the establishment of taxi procedures to ensure safety of operations, beyond the simple notification to the AFIS unit, Member States should consider the establishment of appropriate aerodrome control functions.

comment

51

comment by: ENAV

1.4.8 HOLDING

#b) HOLD POSITION;

Even for AFIU there are borderline situations closely related to safety where is necessary to say “HOLD POSITION [TRAFFIC (information)]”. For instance, when an aircraft is vacating runway and another one is taxiing in converging direction without giving priority, or when an aircraft at the Holding Point (HP) starts to line up while another aircraft is on final for the same runway. In those cases where the maneuver made by pilot could affect the safety, this phraseology could be useful.

“Note. – This phraseology must be used only for safety reasons.”



response

Not accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

Specifically, it is reminded that the safety concerns about operations on the manoeuvring area should be addressed by FIS through the timely provision of clear and concise information.

comment

52

comment by: ENAV

1.4.10 PREPARATION FOR TAKE-OFF**b) REPORT WHEN READY [FOR DEPARTURE];**

Phraseology normally used also in AFIS, in particular: “REPORT READY TO TAXI”, “REPORT READY FOR DEPARTURE”, “REPORT READY TO COPY [ATC CLEARANCE]”. Therefore, this phraseology must be provided.

f) LINE UP [AND WAIT];

Phraseology useful also in AFIU, for instance when the aircraft at the RHP is ready for departure but the runway is still occupied. In fact, in this situation such phraseology



permits an expedite flow of traffic without causing delays when an aircraft is vacating runway with others waiting at the holding point.

m) APPROVED, TAXI TO HOLDING POINT RUNWAY (number), INTERSECTION (designation or name of intersection);

a standard phraseology should be considered for AFIS

o) ADVISE ABLE TO DEPART FROM RUNWAY (number), INTERSECTION (designation or name of intersection);

Useful phraseology in order to know if an aircraft is able to depart from an intermediate intersection, due for example a temporary unavailability of the taxiway which lead at the starting point of the runway.

p) TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES;

p) As above.

q) LINE UP AND WAIT RUNWAY (number), INTERSECTION (name of intersection), (essential local traffic information);

See point f).

Page 28: information on the runway status

Delete the word "Status"

v) NO REPORTED TRAFFIC RUNWAY (number)

runway free have been adopted and used years ago. there is no rational for the change; what is of a major importance is the definition of the criteria and responsibility (what are the conditions for RWY FREE?).

"AFISOs shall provide information to departing and arriving aircraft that the runway is free when no aircraft, vehicles or other obstructions are on the runway or closer to the runway than a distance specified by the appropriate authority. "

The above quote is from EC AFIS Manual and should be at least AMC in SERA (so that both pilots and ATS personnel knows the exact meaning of the safety sensitive phrase.

NO REPORTED TRAFFIC RUNWAY may cause misunderstanding, better to use: "RUNWAY (number) FREE"

The same applies for 1.4.14 point c) NO REPORTED TRAFFIC RUNWAY (number); and 1.4.19 point j) NO REPORTED TRAFFIC RUNWAY (number).

In case of helicopters operating on helipad: "HELIPAD [(direction)] FREE "

To report the absence of traffic on the Runway (different from the condition of "runway free") something like "no traffic on the runway" should be used. AFIS is provided through visual surveillance so the reference to "reported" traffic is unclear.

response

Partially accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member



State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning 'information on the actual use on the runway', which is included in Section 2.3 of NPA 2021-05.

Concerning comments to points (b), (f), (m), (o), (p), and (q): Not accepted.

The recommended phraseologies and scenarios envisaged are suitable only for the control of the traffic on the manoeuvring area.

Concerning comments to points (v) and (w): After thorough consideration, points (v) and (w) are removed from Section 1.4.10, as well as point (c) from Section 1.4.14, as they already appear in Section 1.4.19. In this way, it is clarified that they apply to any situation where the information on the actual use of the runway is necessary (e.g. for take-off and/or landing in the AFIS context). Section 1.4.19 is amended by introducing a description of the circumstances, and a related note, to emphasise under which circumstances such phraseologies are to be used. This includes the indication that information concerns 'information on the actual use on the runway' instead of 'runway status'.

comment

53

comment by: ENAV

1.4.11 TAKE-OFF CLEARANCE

i) CLEARED FOR TAKE-OFF [FROM (location)] (present position, taxiway, final approach and take-off area, runway and number);

Phraseology very useful also in AFIU considering the frequent presence of helicopters.

response

Not accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

Take-off clearances belong clearly and unambiguously to aerodrome ATC service, and not to AFIS.

comment

54

comment by: ENAV

1.4.14 IN THE CIRCUIT

In presence of several aircraft in traffic circuit it may happen that pilots request their number in the approach; this kind of information is not foreseen for AFIU.

response

Noted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS



unit provide its services according to the principles and provisions established for that service.

In the context of the provision of AFIS, it is expected that information about the position of other aircraft in circuit is provided. Assigning numbers in the circuit is regarded an ATC service action.

comment

55

comment by: ENAV

1.4.16 LANDING CLEARANCE

h) CLEARED LOW PASS [as in f]);

Even in AFIU low pass are allowed and not only for visual inspection purposes, so a standard phraseology must be provided, for example: "See 1.4.10 point v)" or "LOW PASS AT OWN DISCRETION, WIND (direction and speed) (units)".

A low pass could be requested for safety reasons like checking the landing gear. Phraseology should give an AFIS the chance to manage such a request with something like " LOW PASS AT OWN DISCRETION ".

response

Not accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

In the context of the provision of AFIS, it is expected that the pilot declare their intentions with regard to the use of the runway. Should a specific circumstance occur, like the mentioned check of the landing gear, the situation may be communicated between the AFISO and the pilot by using plain language, as allowed by point SERA.14001.

comment

56

comment by: ENAV

1.4.18 MISSED APPROACH

a) GO AROUND;

Every AFIU encounters the event of a go around. AFIS phraseology could be implemented to ensure a correct response to such operation.

response

Not accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.

In the context of the provision of AFIS, the pilot decides the course of actions, to which the timely provision of information by the AFIS unit contributes.

comment

57

comment by: ENAV



	<p>1.4.19 Information to aircraft <i>j) NO REPORTED TRAFFIC RUNWAY (number).</i> See comment to 1.4.10 v).</p>
response	<p>Not accepted Please see the response to comment #52.</p>
comment	<p>58 comment by: ENAV</p> <p>1.4.20 RUNWAY VACATING AND COMMUNICATIONS AFTER LANDING The related phraseology to contact the GROUND is reported as available for FIS too. It seems improbable to have an AFIS managing the air side and a GROUND managing the land side. <i>b) WHEN VACATED CONTACT GROUND (frequency);</i> In case of more than one taxiway to vacate runway, pilots not familiar may request detailed information. The form could be “VACATE VIA (identification of taxiway) <i>c) EXPEDITE VACATING;</i> Even AFIU in particular circumstances needs to adopt this phraseology to maintain a safe and expedite flow of traffic, for instance when a landed aircraft has to vacate the runway while another one is on final. <i>g) AIR-TAXI TO (or VIA) (location or routing as appropriate) [CAUTION (dust, blowing snow, loose debris, taxiing light aircraft, personnel, etc.)];</i> Phraseology useful also in AFIU.</p>
response	<p>Partially accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>The phraseologies in points (a) and (b) are only applicable to ATC service, as the suffix ‘GROUND’ indicates the unit/service that provides surface movement control and, therefore, cannot be provided at AFIS aerodromes (see point (b)(7) of point ATS.TR.115 in Regulation (EU) 2020/469. The subject phraseologies have been amended accordingly.</p> <p>The phraseology in point (b) is already applicable to the provision of ATC service and is transposed unchanged from the ICAO PANS-ATM phraseology. It relates to change of frequency after vacation of the runway. The proposed amendment instead is purposed to introduce an instruction on the routing on the manoeuvring area, which is not in line with the title of Section 1.4.20 ‘Runway vacating and communications after landing’.</p> <p>Concerning the comments on points (c) and (g), the scenarios belong exclusively to the provision of ATC service, being phraseologies for the issuance of instructions.</p>
comment	<p>59 comment by: ENAV</p> <p>2.1.6 SPEED CONTROL</p>

response	<p>a) REPORT SPEED; Phraseology used also in AFIS.</p> <p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>It is not understood in which context information on aircraft speed could be utilised by the AFIS units. Such information normally supports the provision of separation between aircraft, which is an exclusive ATC service function.</p>
comment	<p>60 comment by: ENAV</p> <p>2.3.15 LEVEL DISCREPANCY</p> <p>The possibility to highlight the discrepancy between cleared and displayed level should be left to a unit providing FIS/AFIS too. These units could be relaying ATC clearances on behalf of an ATC unit.</p>
response	<p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in the context of aerodrome operations, either in the context of an aerodrome or en-route. When a Member State selects the provision of FIS, it is expected that the FIS or AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>While it is acknowledged that FIS/AFIS units may relay clearances and instructions issued by ATC units to aircraft, such units are not regarded to be responsible for monitoring the execution of such clearances and instructions.</p>
comment	<p>61 comment by: ENAV</p> <p>6.1 ATFM</p> <p>All the phraseology mentioned in this section is used also in AFIS.</p> <p>An AFIS unit should be given the possibility to communicate to an aircraft the cancellation of start-up when CTOT has expired or requested too late/too early. It is self-evident it would occur because of ATFM measures and only after coordination between ATC units/FIS units, it shouldn't be intended as a clearance issued by the AFIS unit.</p>
response	<p>Not accepted</p> <p>Adherence to the calculated take-off time (CTOT) is the pilot's responsibility, in particular at uncontrolled aerodromes. AFIS units are not responsible for the monitoring of adherence to ATFM measures issued by ATC units and relayed to pilots, nor to deny start-up clearances. Should the scenario described occur, pilots should consider coordinating with the AFIS units and, in this case, the phraseologies in Section 1.2.10 'Relaying clearances, instructions and information' would apply.</p>

comment	<p>62 comment by: ENAV</p> <p>REMARK: As the purpose of this NPA is to standardize the FIS phraseology, another important gap to rule is the AFIS phraseology with ground vehicles and personnel. In fact, many AFIU work together with Aerodrome Operators whom manage aprons and make runway inspections. For these reasons is clear that also this sector needs to be regulated. The only document mentioning these procedures is the same used for this NPA: AFIS Manual, Eurocontrol.</p>
response	<p>Noted Please see the response to comment #279.</p>
comment	<p>63 comment by: ENAV</p> <p>REMARK: 1.4.4 Typing error: "ATC or FIS" instead of only "ATC" in description.</p>
response	<p>Noted Following a thorough assessment of the comments received, EASA decided to keep Section 1.4.4 applicable only to ATC service. No amendment is required to the current text of the subject Section.</p>
comment	<p>64 comment by: DTA/MCU</p> <ol style="list-style-type: none"> 1. Section 1.1.1 : both height and altitude should only be given in feet, optionally with, respectively, "QFE" and "QNH" at the end of the expression if a clarification is needed. 2. Section 1.1.3 : minimum fuel seems explicit enough in any context including electrically powered aircraft. 3. Section 1.4.3 d) & f) : "ADVISES" instead of "ADVICES"? 4. Section 1.4.10 w) & 1.4.19 i) : If this expression is meant to be added, "OCCUPIED" should be the only expression in use. It is not clear whether this expression is really useful : wouldn't it better to clarify directly the nature of the obstacle occupying the runway (departing traffic on the runway or else)? It could help the calling station to evaluate the time of occupation and act accordingly. 5. Section 1.4.14 c) : why should the ATC use the expression "NO REPORTED TRAFFIC RUNWAY (number)" especially in the circuit context since it's not the case in 1.4.10 v) & 1.4.19 j) ? 6. Section 2.1 : As a general comment, ATS surveillance service is today closely related to ATC service, if FIS/AFIS officers are allowed to use expressions in this section it raises the question of the type of air traffic service they're providing to aircraft. It should be made clear somehow for the pilot that these expressions are only used as part of the flight information service when disseminated by FIS/AFIS officers. 7. Section 2.1.1 g) : the expression in f) is already used by ATC, no need to make g) applicable to ATC.
response	<p>With regard to the comment on Section 1.1.1: Not accepted The existing phraseology is transposed unchanged from ICAO PANS-ATM. The comment does not justify the proposal for amendments.</p>

With regard to the comment on Section 1.1.3: Noted
Please see the response to comment #1.

With regard to the comment on Section 1.4.3: Noted
Please see the response to comment #47.

With regard to the comment on Section 1.4.10(w) and 1.4.19(i): Noted
Please see the response to comment #52.

With regard to the comment on Section 1.4.14(c): Noted
As ATC units may also provide FIS, all FIS-related phraseologies may be used also by the ATC units, unless the specific circumstances dictate the use of other, more suitable ATC phraseologies.

With regard to the comment on Section 2.1: Noted
It is expected that pilots are aware of the airspace class and type of aerodrome (controlled or uncontrolled) they operate in/at. Concerning air-ground voice communication, confirmation of the type and service each ATS unit provides to pilots may also be sought by the call sign of such unit, which is established according to point ATS.TR.115 'Identification of air traffic services units'.

With regard to the comment on Section 2.1.1(g): Not accepted
The applicability of point (g) to ATC units is introduced as a direct consequence of the possible scenario where such ATC units do not use the optional text provided in point (f), i.e. [RESUME (or CONTINUE) OWN NAVIGATION].

comment	67	comment by: <i>Skovde Airport</i>
	<p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>	
response	<p>Not accepted Please see the response to comment #144.</p>	
comment	68	comment by: <i>Skovde Airport</i>
	<p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>	
response	<p>Not accepted Please see the response to comment #144.</p>	

comment	<p data-bbox="368 199 416 241">69</p> <p data-bbox="1038 199 1394 241" style="text-align: right;">comment by: <i>Skovde Airport</i></p> <p data-bbox="368 264 663 297">Section 1.3.3 (Holding)</p> <p data-bbox="368 300 1394 439">We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p data-bbox="368 479 1182 512">This methodology is published in the Swedish national regulations.</p> <p data-bbox="368 553 906 586">It is proposed to add the following phrase:</p> <p data-bbox="368 589 1099 622">(traffic information) SUGGEST HOLDING (published holding)</p> <p data-bbox="368 624 1394 689">The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p data-bbox="368 696 544 730">Not accepted</p> <p data-bbox="368 770 1394 943">It is expected that Member States designate the appropriate ATS to support safe operations in the context of aerodrome operations, either in the context of an aerodrome or en-route. When a Member State selects the provision of FIS, it is expected that the FIC or AFIS unit provide the services according to the principles and provisions established for that service.</p> <p data-bbox="368 963 1394 1135">Putting aircraft in holding is a tool for controlling the use of the runway. The proposed use in the comment is transcending in the domain of advisory service which is, from the tool and actions taken, extremely similar to ATC service except the responsibility to provide separation. AFIS tasks and functions could locally be complemented if necessary, within the limitations foreseen by the EU legislation.</p> <p data-bbox="368 1155 1394 1220">Please see also the response to comment #71 with regard to the use of the term 'suggest' in the phraseologies.</p>
comment	<p data-bbox="368 1290 416 1332">70</p> <p data-bbox="1038 1290 1394 1332" style="text-align: right;">comment by: <i>Skovde Airport</i></p> <p data-bbox="368 1355 576 1388">Section 1.4.6 d)</p> <p data-bbox="368 1391 951 1424">Parentheses and "and" are missing before QFE.</p> <p data-bbox="368 1426 1394 1491">Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p data-bbox="368 1509 461 1543">Noted</p> <p data-bbox="368 1545 1394 1675">The current version of the text of this GM in Appendix 1 AMC1 SERA.14001 is according to the comment. The text proposed with NPA 2021-05 contained some typos. EASA expresses its thankfulness for highlighting it.</p>
comment	<p data-bbox="368 1715 416 1758">71</p> <p data-bbox="1038 1715 1394 1758" style="text-align: right;">comment by: <i>Skovde Airport</i></p> <p data-bbox="368 1780 544 1814">Section 1.4.7</p> <p data-bbox="368 1816 1394 2002">In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.</p>

response	<p>This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)</p> <p>The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p> <p>Not accepted</p> <p>Using action verbs such as ‘suggest’ in air-ground phraseologies represents de facto a form of advisory service which is not compatible with FIS. Local implementation of advisory-like service could be pursued when in accordance with the framework defined by the EU legislation.</p> <p>Please see also the response to comment #50.</p>
comment	<p>72 comment by: <i>Skovde Airport</i></p> <p>Section 1.4.10 b);c);p)</p> <p>The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p>
response	<p>Not accepted.</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>Concerning comments to points (b), (c), (p): Not accepted.</p> <p>The phraseologies and scenarios envisaged are suitable only for the provision of ATC service for the control of the traffic on the manoeuvring area. Upon request of the pilot, providing that such information is available, nothing prevents an AFIS unit from providing information about the characteristics of the manoeuvring area.</p>
comment	<p>73 comment by: <i>Skovde Airport</i></p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)</p> <p>The phrase “runway (number) free” should according to NPA 2021-05 be replaced by the phrase “no reported traffic runway (number)”.</p> <p>Which criteria should be fulfilled when the AFISO may use the phrase “no reported traffic runway (number)”.</p>

	<p>Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of “no reported traffic runway”.</p> <p>Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users. With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations.</p> <p>Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p>
response	<p>Not accepted.</p> <p>The phraseologies specified in the comment come with a series of conditions that are embedded in the implementation pursued locally, not necessarily being the model used in other AFIS implementations. It assumes a minimal control of both pedestrian and vehicles, which is not part of the AFIS per se, but rather a solution for local specificities to be approved by the competent authority (see point (f) of point ATS.TR.305 in Regulation (EU) 2020/469, with the related responsibilities for the competent authority). While such implementations demonstrate their added value in terms of safety of operations, it should not be considered mandatory that AFIS implementation should be accompanied by the control of vehicles and pedestrian on the manoeuvring area.</p> <p>EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning ‘information on the actual use on the runway’, which is included in Section 2.3 of NPA 2021-05.</p> <p>Please see also the responses to comments #52 and #279.</p>
comment	<p>74 comment by: Skovde Airport</p> <p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>

response	<p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>Pilots that operate at uncontrolled aerodromes are expected to comply with the specific instructions published for local operations. This includes the communication of their execution to the relevant ATS units. It is not considered necessary to introduce phraseologies for all cases to notify the execution of an established procedure.</p>
comment	<p>75 comment by: <i>Skovde Airport</i></p> <p>Section 1.4.13</p> <p>Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted</p> <p>It is expected that, when addressing the provision of alerting services to flights that operate without a flight plan, Member States determine the means to collect the necessary information. In this context, introducing a specified phraseology does not seem to be necessary, also in the absence of a related ICAO phraseology on the specific scenario.</p>
comment	<p>76 comment by: <i>Skovde Airport</i></p> <p>Section 1.4.13 c);g)</p> <p>The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>
response	<p>Not accepted</p> <p>Such priority might be defined by the time criticality — but considering the responsibilities of the AFIS unit, all of them are equally important. Introducing such prioritisation for an uncontrolled environment may create additional workload for AFIS officers.</p>

comment	77 comment by: <i>Skovde Airport</i>
	<p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	Not accepted
	<p>The comment is not fully understood as it does not provide an explanation about the claimed lack of consistency between Section 1.4.13(c) and GM2 ATS.TR.305(a);(b);(c). The only difference between them is the information related to the temperature on the ground, which is optional (as indicated by the convention of indicating optional phraseologies between squared brackets).</p>
comment	78 comment by: <i>Skovde Airport</i>
	<p>Section 1.4.19 We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.</p> <p>It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p>
response	Not accepted
	<p>It is assumed that pilots are aware of the ATC basics, and of the related tasks and attributions. Moreover, it must be noted that all radio communications from ATS units to aircraft have to unambiguously specify the type of such unit (see point ATS.TR.115 in Regulation (EU) 2020/469), hence indicating the type of service being provided.</p>
comment	79 comment by: <i>Skovde Airport</i>
	<p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called “taxi information”.</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p>

response	<p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p> <p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning 'information on the actual use on the runway', which is included in Section 2.3 of NPA 2021-05.</p> <p>Appendix 1 AMC1 SERA.14001, as amended by ED Decision 2021/014/R, includes phraseologies that are pertinent to the delivery of traffic information concerning aircraft, in the various scenarios, including their applicability to ATC service and/or FIS.</p> <p>With regard to information on vehicles and persons that constitute a collision hazard for aircraft on the manoeuvring area, it is considered that Section 1.1.7(a), which is generic in nature, and also Section 1.4.19, address that need, with the appropriate adaptations to the specific scenario, including the use of plain language as stipulated in point SERA.14001.</p>
comment	<p>82 comment by: <i>Hagfors Airport</i></p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>83 comment by: <i>Hagfors Airport</i></p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>84 comment by: <i>Hagfors Airport</i></p>

	<p>Section 1.3.3 (Holding)</p> <p>We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding)</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) &quot;Scope of flight information service&quot;.</p>
response	<p>Not accepted</p> <p>Please see the responses to comments #69 and #71.</p>
comment	<p>85 comment by: Hagfors Airport</p> <p>Section 1.4.6 d)</p> <p>Parentheses and "and" are missing before QFE.</p> <p>Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted</p> <p>Please see the response to comment #70.</p>
comment	<p>86 comment by: Hagfors Airport</p> <p>Section 1.4.7</p> <p>In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron.</p> <p>This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)</p> <p>The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) &quot;collision hazards with aircraft, vehicles and persons operating on the maneuvering area&quot;.</p>
response	<p>Not accepted</p> <p>Please see the response to comment #71.</p>
comment	<p>87 comment by: Hagfors Airport</p>

	<p>Section 1.4.10 b);c);p) The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p>
response	<p>Not accepted Please see the response to comment #72.</p>
comment	<p>88 comment by: Hagfors Airport</p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j) The phrase “runway (number) free” should according to NPA 2021-05 be replaced by the phrase “no reported traffic runway (number)”.</p> <p>Which criteria should be fulfilled when the AFISO may use the phrase “no reported traffic runway (number)”.</p> <p>Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of “no reported traffic runway”</p> <p>Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users.</p> <p>With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations. Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p>
response	<p>Not accepted Please see the response to comment #73.</p>
comment	<p>89 comment by: Hagfors Airport</p> <p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p>

response	<p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) &quot;Scope of flight information service&quot;;</p> <p>Not accepted Please see the response to comment #74.</p>
comment	<p>90 comment by: Hagfors Airport</p> <p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted Please see the response to comment #75.</p>
comment	<p>91 comment by: Hagfors Airport</p> <p>Section 1.4.13 c);g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>
response	<p>Not accepted Please see the response to comment #76.</p>
comment	<p>92 comment by: Hagfors Airport</p> <p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	<p>Not accepted Please see the response to comment #77.</p>
comment	<p>93 comment by: Hagfors Airport</p> <p>Section 1.4.19</p>

response	<p>We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given. It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p> <p>Not accepted Please see the response to comment #78.</p>
comment	<p>94 comment by: Hagfors Airport</p> <p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called “taxi information”.</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) “collision hazards with aircraft, vehicles and persons operating on the maneuvering area;” it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	<p>Not accepted Please see the response to comment #79.</p>
comment	<p>98 comment by: AB Dalaflyget</p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>99 comment by: AB Dalaflyget</p> <p>Section 1.3.3 (Holding) We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p>



response	<p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding) The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
	<p>Not accepted Please see the responses to comments #69 and #71.</p>
comment	<p>100 comment by: AB Dalaflyget</p> <p>Section 1.4.6 d) Parentheses and "and" are missing before QFE. Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted Please see the response to comment #70.</p>
comment	<p>101 comment by: AB Dalaflyget</p> <p>Section 1.4.7 In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position. This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason) The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p>
response	<p>Not accepted Please see the response to comment #71.</p>
comment	<p>102 comment by: AB Dalaflyget</p> <p>Section 1.4.7 In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position. This methodology is published in the Swedish national regulations.</p>

response	<p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason) The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p> <p>Not accepted Please see the response to comment #71.</p>
comment	<p>103 comment by: AB Dalaflyget</p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j) The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)". Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)". Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of "no reported traffic runway"</p> <p>Furthermore, the phrases "no reported traffic" and "no reported traffic runway [number]" are very similar, which will in all probability lead to confusion and uncertainty among airspace users. With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: "Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19."</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations. Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p> <p>Not accepted Please see the response to comment #73.</p>
comment	<p>104 comment by: AB Dalaflyget</p> <p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p>



response	<p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p> <p>Not accepted</p> <p>It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service.</p> <p>Pilots that operate at uncontrolled aerodromes are expected to comply with the specific instructions published for local operations. This includes the communication of their execution to the relevant ATS units. It is not considered necessary to introduce phraseologies for all cases to notify the execution of an established procedure.</p>
comment	<p>105 comment by: AB Dalaflyget</p> <p>Section 1.4.13</p> <p>Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted</p> <p>Please see the response to comment #75.</p>
comment	<p>106 comment by: AB Dalaflyget</p> <p>Section 1.4.13 c);g)</p> <p>The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p> <p>Section 1.4.13 c)</p> <p>The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	<p>Not accepted</p> <p>Please see response to comment #76 and #77.</p>
comment	<p>107 comment by: AB Dalaflyget</p> <p>Section 1.4.19</p>

response	<p>We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.</p> <p>It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p> <p>Not accepted Please see the response to comment #78.</p>
comment	<p>108 comment by: AB Dalaflyget</p> <p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	<p>Not accepted Please see the response to comment #79.</p>
comment	<p>111 comment by: Hagfors Airport</p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>112 comment by: Hagfors Airport</p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p>



	<p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>113 comment by: Hagfors Airport</p> <p>Section 1.3.3 (Holding) We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding) The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p>Not accepted Please see the responses to comments #69 and #71.</p>
comment	<p>114 comment by: Hagfors Airport</p> <p>Section 1.4.6 d) Parentheses and "and" are missing before QFE. Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted Please see the response to comment #70.</p>
comment	<p>115 comment by: Hagfors Airport</p> <p>Section 1.4.7 In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position. This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason) The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p>

response Not accepted
Please see the response to comment #71.

comment 116 comment by: Hagfors Airport

Section 1.4.10 b);c);p)
The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.

The following phrases are suggested to be allowed for AFIS to use:
REPORT WHEN READY [FOR DEPARTURE]
ARE YOU READY [FOR DEPARTURE]?
TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES

response Not accepted
Please see the response to comment #72.

comment 117 comment by: Hagfors Airport

Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)
The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)".
Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)".
Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase?
In such cases, does this affect the view or definition of runway incursion?
Definition is required of "no reported traffic runway"

Furthermore, the phrases "no reported traffic" and "no reported traffic runway [number]" are very similar, which will in all probability lead to confusion and uncertainty among airspace users.
With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: "Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19."

The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j):
RUNWAY (number) FREE
This methodology is published in the Swedish national regulations.
Criterion for being able to announce the runway free is as follows:
No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.

response Not accepted
Please see the response to comment #73.

comment 118 comment by: Hagfors Airport



	<p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p>Not accepted Please see the response to comment #74.</p>
comment	<p>119 comment by: Hagfors Airport</p>
	<p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted Please see the response to comment #75.</p>
comment	<p>120 comment by: Hagfors Airport</p>
	<p>Section 1.4.13 c);g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>
response	<p>Not accepted Please see the response to comment #76.</p>
comment	<p>121 comment by: Hagfors Airport</p>
	<p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	<p>Not accepted Please see the response to comment #77.</p>

comment	<p>122 comment by: Hagfors Airport</p> <p>Section 1.4.19 We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given. It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p>
response	<p>Not accepted Please see the response to comment #78.</p>
comment	<p>123 comment by: Hagfors Airport</p> <p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	<p>Not accepted Please see the response to comment #79.</p>
comment	<p>126 comment by: Härjedalen Sveg Airport</p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>127 comment by: Härjedalen Sveg Airport</p> <p>Section 1.1.15 paragraph 5</p>

	<p>The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>128 comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.3.3 (Holding) We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding) The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p>Not accepted Please see the responses to comments #69 and #71.</p>
comment	<p>129 comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.6 d) Parentheses and "and" are missing before QFE. Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted Please see the response to comment #70.</p>
comment	<p>130 comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.7 In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position. This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)</p>



	<p>The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p>
response	<p>Not accepted Please see the response to comment #71.</p>
comment	<p>131 comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.10 b);c);p) The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p>
response	<p>Not accepted Please see the response to comment #72.</p>
comment	<p>132 comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j) The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)". Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)". Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of "no reported traffic runway"</p> <p>Furthermore, the phrases "no reported traffic" and "no reported traffic runway [number]" are very similar, which will in all probability lead to confusion and uncertainty among airspace users. With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: "Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19."</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations. Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p>
response	<p>Not accepted Please see the response to comment #73.</p>

comment	133	comment by: <i>Härjedalen Sveg Airport</i>
	<p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>	
response	Not accepted Please see the response to comment #74.	
comment	134	comment by: <i>Härjedalen Sveg Airport</i>
	<p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>	
response	Not accepted Please see the response to comment #75.	
comment	135	comment by: <i>Härjedalen Sveg Airport</i>
	<p>Section 1.4.13 c);g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>	
response	Not accepted Please see the response to comment #76.	
comment	136	comment by: <i>Härjedalen Sveg Airport</i>
	<p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>	
response	Not accepted	

Please see the response to comment #77.

comment	<p>138</p> <p style="text-align: right;">comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.19 We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given. It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p>
response	<p>Not accepted Please see the response to comment #78.</p>

comment	<p>139</p> <p style="text-align: right;">comment by: <i>Härjedalen Sveg Airport</i></p> <p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	<p>Not accepted Please see the response to comment #79.</p>

comment	<p>143</p> <p style="text-align: right;">comment by: <i>Hemavan Tärnaby Airport AB</i></p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p>
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The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.

Section 1.3.3 (Holding)

We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.

This methodology is published in the Swedish national regulations.

It is proposed to add the following phrase:

(traffic information) SUGGEST HOLDING (published holding)

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

Section 1.4.6 d)

Parentheses and "and" are missing before QFE.

Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.

Section 1.4.7

In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.

This methodology is published in the Swedish national regulations.

The following phrases are suggested to be added:

(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)

The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"

Section 1.4.10 b);c);p)

The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.

The following phrases are suggested to be allowed for AFIS to use:

REPORT WHEN READY [FOR DEPARTURE]

ARE YOU READY [FOR DEPARTURE]?

TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES

Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)

The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)".

Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)".



Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase?

In such cases, does this affect the view or definition of runway incursion?

Definition is required of “no reported traffic runway”

Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users.

With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”

The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j):

RUNWAY (number) FREE

This methodology is published in the Swedish national regulations.

Criterion for being able to announce the runway free is as follows:

No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.

Section 1.4.10

Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.

It is proposed to add the following phrase:

*WILL MAKE RIGHT TURN AFTER DEPARTURE

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

Section 1.4.13

Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.

The following phrase is proposed to replace 1.4.13 a):

*a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING

Section 1.4.13 c);g)

The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.

Traffic information is proposed to precede other information in subsection 1.4.13 c);g)

Section 1.4.13 c)



The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.

Section 1.4.19

We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.

It is proposed to add the following phrase:

AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)

Section 1.4.20

We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".

The following phrases are suggested to be added:

TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)]

TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number)

RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]

This methodology is published in the Swedish national regulations.

In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology:

TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)

response

With reference to the comment on Section 1.1.9: Not accepted

Please see the response to comment #144.

With reference to the comment on Section 1.1.15 paragraph 5: Not accepted

Please see the response to comment #144.

With reference to the comment on Section 1.3.3 (Holding): Not accepted

Please see the responses to comments #69 and #71.

With reference to the comment on Section 1.4.6 paragraph (d): Noted

Please see the response to comment #70.

With reference to the comment on Section 1.4.7: Not accepted

Please see the response to comment #71.

With reference to the comment on Section 1.4.10 paragraphs (b), (c) and (p): Not accepted

Please see the response to comment #72.

With reference to the comment on Section 1.4.10(v), Section 1.4.14(c) and Section 1.4.19(j): Not accepted

Please see the response to comment #73.



With reference to the comment on Section 1.4.10: Not accepted

Please see the response to comment #74.

With reference to the comment on Section 1.4.13: Not accepted

Please see the response to comment #75.

With reference to the comment on Section 1.4.13 paragraphs (c) and (g): Not accepted

Please see the response to comment #76.

With reference to the comment on Section 1.4.13 paragraph (c): Not accepted

Please see the response to comment #77.

With reference to the comment on Section 1.4.19: Not accepted

Please see the response to comment #78.

With reference to the comment on Section 1.4.20: Not accepted

Please see the response to comment #79.

comment 146

comment by: *European Air Cargo*

Section 1.1.9

The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.

The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9

Section 1.1.15 paragraph 5

The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.

The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.

Section 1.3.3 (Holding)

We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.

This methodology is published in the Swedish national regulations.

It is proposed to add the following phrase:

(traffic information) SUGGEST HOLDING (published holding)

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

Section 1.4.6 d)

Parentheses and "and" are missing before QFE.



Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a “needs phrase”, square brackets around [and QFE] should also be inserted.

Section 1.4.7

In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.

This methodology is published in the Swedish national regulations.

The following phrases are suggested to be added:

(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)

The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"

Section 1.4.10 b);c);p)

The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.

The following phrases are suggested to be allowed for AFIS to use:

REPORT WHEN READY [FOR DEPARTURE]

ARE YOU READY [FOR DEPARTURE]?

TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES

Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)

The phrase “runway (number) free” should according to NPA 2021-05 be replaced by the phrase “no reported traffic runway (number)”.

Which criteria should be fulfilled when the AFISO may use the phrase “no reported traffic runway (number)”.

Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase?

In such cases, does this affect the view or definition of runway incursion?

Definition is required of “no reported traffic runway”

Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users.

With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”

The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j):

RUNWAY (number) FREE

This methodology is published in the Swedish national regulations.

Criterion for being able to announce the runway free is as follows:



No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.

Section 1.4.10

Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.

It is proposed to add the following phrase:

*WILL MAKE RIGHT TURN AFTER DEPARTURE

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

Section 1.4.13

Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.

The following phrase is proposed to replace 1.4.13 a):

*a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING

Section 1.4.13 c);g)

The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.

Traffic information is proposed to precede other information in subsection 1.4.13 c);g)

Section 1.4.13 c)

The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.

Section 1.4.19

We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.

It is proposed to add the following phrase:

AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)

Section 1.4.20

We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".

The following phrases are suggested to be added:

TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)]



	<p>TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	Please see responses to the various issues in comment #143, which is identical to this comment.
comment	<p>147 comment by: <i>Civil Aviation Authority the Netherlands</i></p> <p>Regarding paragraph 1.1.3, it is suggested to retain the term minimum fuel in all cases and not to introduce the concept of energy. The essence of the message remains the same. In both cases there is an urgency to land. Minimum fuel is embedded in the RTF phraseology in such a manner that a notification of 'minimum energy' could be misunderstood and could create confusion.</p>
response	<p>Noted</p> <p>Please see the response to comment #1.</p>
comment	<p>149 comment by: <i>South Lapland Airport</i></p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted</p> <p>Please see the response to comment #144.</p>
comment	<p>151 comment by: <i>South Lapland Airport</i></p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	<p>Not accepted</p> <p>Please see the response to comment #144.</p>
comment	<p>152 comment by: <i>South Lapland Airport</i></p>

	<p>Section 1.3.3 (Holding) We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding) The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service"</p>
response	<p>Not accepted Please see the responses to comments #69 and #71.</p>
comment	<p>153 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.6 d) Parentheses and "and" are missing before QFE. Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted Please see the response to comment #70.</p>
comment	<p>154 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.7 In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position. This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added: (traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason) The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p>
response	<p>Not accepted Please see the response to comment #71.</p>
comment	<p>155 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.10 b);c);p)</p>

response	<p>The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p> <p>Not accepted Please see the response to comment #72.</p>
comment	<p>156 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j) The phrase “runway (number) free” should according to NPA 2021-05 be replaced by the phrase “no reported traffic runway (number)”. Which criteria should be fulfilled when the AFISO may use the phrase “no reported traffic runway (number)”. Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of “no reported traffic runway”</p> <p>Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users. With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations. Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p>
response	<p>Not accepted Please see the response to comment #73.</p>
comment	<p>157 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p>

response	<p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p> <p>Not accepted Please see the response to comment #74.</p>
comment	<p>158 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted Please see the response to comment #75.</p>
comment	<p>159 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.13 c);g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>
response	<p>Not accepted Please see the response to comment #76.</p>
comment	<p>160 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	<p>Not accepted Please see the response to comment #77.</p>
comment	<p>161 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.19 We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given. It is proposed to add the following phrase:</p>

	AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)
response	Not accepted Please see the response to comment #78.
comment	<p>162 comment by: <i>South Lapland Airport</i></p> <p>Section 1.4.20 We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called “taxi information”.</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	Not accepted Please see the response to comment #79.
comment	<p>167 comment by: <i>AB Dalaflyget</i></p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	Not accepted Please see the response to comment #144.
comment	<p>168 comment by: <i>AB Dalaflyget</i></p> <p>Section 1.1.15 paragraph 5 The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p>
response	Not accepted

Please see the response to comment #144.

comment

169

comment by: AB Dalaflyget

Section 1.3.3 (Holding)

We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.

This methodology is published in the Swedish national regulations.

It is proposed to add the following phrase:

(traffic information) SUGGEST HOLDING (published holding)

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

response

Not accepted

Please see the responses to comments #69 and #71.

comment

170

comment by: AB Dalaflyget

Section 1.4.6 d)

Parentheses and "and" are missing before QFE.

Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.

response

Noted

Please see the response to comment #70.

comment

171

comment by: AB Dalaflyget

Section 1.4.7

In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.

This methodology is published in the Swedish national regulations.

The following phrases are suggested to be added:

(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)

The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"

response

Not accepted

Please see the response to comment #71.



comment	<p>172 comment by: AB Dalaflyget</p>
	<p>Section 1.4.10 b);c);p) The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p>
response	<p>Not accepted Please see the response to comment #72.</p>
comment	<p>173 comment by: AB Dalaflyget</p>
	<p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j) The phrase “runway (number) free” should according to NPA 2021-05 be replaced by the phrase “no reported traffic runway (number)”. Which criteria should be fulfilled when the AFISO may use the phrase “no reported traffic runway (number)”. Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of “no reported traffic runway”</p> <p>Furthermore, the phrases “no reported traffic” and “no reported traffic runway [number]” are very similar, which will in all probability lead to confusion and uncertainty among airspace users. With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: “Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19.”</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE This methodology is published in the Swedish national regulations. Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.</p>
response	<p>Not accepted Please see the response to comment #73.</p>
comment	<p>174 comment by: AB Dalaflyget</p>
	<p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p>

response	<p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p> <p>Not accepted Please see the response to comment #74.</p>
comment	<p>175 comment by: AB Dalaflyget</p> <p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING</p>
response	<p>Not accepted Please see the response to comment #75.</p>
comment	<p>176 comment by: AB Dalaflyget</p> <p>Section 1.4.13 c);g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p> <p>Traffic information is proposed to precede other information in subsection 1.4.13 c);g)</p>
response	<p>Not accepted Please see the response to comment #76.</p>
comment	<p>177 comment by: AB Dalaflyget</p> <p>Section 1.4.13 c) The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen</p>
response	<p>Not accepted Please see the response to comment #77.</p>
comment	<p>178 comment by: AB Dalaflyget</p> <p>Section 1.4.19</p>

response	<p>We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.</p> <p>It is proposed to add the following phrase: AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p> <p>Not accepted Please see the response to comment #78.</p>
comment	<p>179 comment by: <i>AB Dalaflyget</i></p> <p>Section 1.4.20</p> <p>We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called “taxi information”.</p> <p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	<p>Not accepted Please see the response to comment #79.</p>
comment	<p>183 comment by: <i>Lycksele flygplats AB</i></p> <p>Section 1.1.9</p> <p>The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>184 comment by: <i>Lycksele flygplats AB</i></p> <p>Section 1.1.15 paragraph 5</p>



response	<p>The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.</p> <p>The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.</p> <p>Not accepted Please see the response to comment #144.</p>
comment	<p>185 comment by: Lycksele flygplats AB</p> <p>Section 1.3.3 (Holding)</p> <p>We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>It is proposed to add the following phrase: (traffic information) SUGGEST HOLDING (published holding) The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p>Not accepted Please see the responses to comments #69 and #71.</p>
comment	<p>186 comment by: Lycksele flygplats AB</p> <p>Section 1.4.6 d)</p> <p>Parentheses and "and" are missing before QFE. Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.</p>
response	<p>Noted Please see the response to comment #70.</p>
comment	<p>187 comment by: Lycksele flygplats AB</p> <p>Section 1.4.7</p> <p>In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.</p> <p>This methodology is published in the Swedish national regulations.</p> <p>The following phrases are suggested to be added:</p>



response	<p>(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason) The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"</p> <p>Not accepted Please see the response to comment #71.</p>
comment	<p>188 comment by: Lycksele flygplats AB</p> <p>Section 1.4.10 b); c); p)</p> <p>The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.</p> <p>The following phrases are suggested to be allowed for AFIS to use: REPORT WHEN READY [FOR DEPARTURE] ARE YOU READY [FOR DEPARTURE]? TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES</p>
response	<p>Not accepted Please see the response to comment #72.</p>
comment	<p>189 comment by: Lycksele flygplats AB</p> <p>Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)</p> <p>The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)". Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)". Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase? In such cases, does this affect the view or definition of runway incursion? Definition is required of "no reported traffic runway"</p> <p>Furthermore, the phrases "no reported traffic" and "no reported traffic runway [number]" are very similar, which will in all probability lead to confusion and uncertainty among airspace users.</p> <p>With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: "Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19."</p> <p>The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j): RUNWAY (number) FREE</p>



response	<p>This methodology is published in the Swedish national regulations.</p> <p>Criterion for being able to announce the runway free is as follows: No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points</p> <p>Not accepted Please see the response to comment #73.</p>
comment	<p>190 comment by: Lycksele flygplats AB</p> <p>Section 1.4.10 Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.</p> <p>It is proposed to add the following phrase: *WILL MAKE RIGHT TURN AFTER DEPARTURE</p> <p>The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".</p>
response	<p>Not accepted Please see the response to comment #74.</p>
comment	<p>191 comment by: Lycksele flygplats AB</p> <p>Section 1.4.13 Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.</p> <p>The following phrase is proposed to replace 1.4.13 a): *a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDIN</p>
response	<p>Not accepted Please see the response to comment #75.</p>
comment	<p>192 comment by: Lycksele flygplats AB</p> <p>Section 1.4.13 c); g) The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.</p>



	<p>Traffic information is proposed to precede other information in subsection 1.4.13 c); g)</p>
response	<p>Not accepted Please see the response to comment #76.</p>
comment	<p>193 comment by: Lycksele flygplats AB</p> <p>Section 1.4.13 c)</p> <p>The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.</p>
response	<p>Not accepted Please see the response to comment #77.</p>
comment	<p>194 comment by: Lycksele flygplats AB</p> <p>Section 1.4.19</p> <p>We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.</p> <p>It is proposed to add the following phrase:</p> <p>AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)</p>
response	<p>Not accepted Please see the response to comment #78.</p>
comment	<p>195 comment by: Lycksele flygplats AB</p> <p>Section 1.4.20</p> <p>We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".</p> <p>The following phrases are suggested to be added:</p> <p>TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)]</p> <p>TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number)</p> <p>RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>

response	Not accepted Please see the response to comment #79.
comment	196 comment by: <i>CANSO</i> 1.1.3 appendix 1. We suggest to keep the term minimum fuel and not introduce the concept of energy .The essence of the message remains the same. In both cases there is some urgency to land. Minimum fuel is embedded in RTF jargon in such a way that a notification of minimum energy could be misunderstood and creates confusion.
response	Noted Please see the response to comment #1.
comment	198 comment by: <i>FLCH Aviation Consult</i> Para 1.1.3 Minimum fuel The proposal to expand the phrase with "energy" seems to be premature, and safety arguments do not warrant such an inclusion in my opinion. The proposed change is not supported and it should be left as it is. If comments are positive to expand the phrase with "energy", EASA should raise the issue with ICAO in order to have one uniform phraseology section. Para 1.2 Area control services The proposed change to "En-route air traffic services" is not considered safety critical, hence not supported. Again, if EASA has strong opinions about such a change, raise the issue with ICAO in order to have one uniform phraseology section. Para 1.2.10 The proposed changes in a) and b) are both supported and likewise the circumstances-text. Para 1.3 Approach control services The proposed change to "Arrival and departure air traffic services" services" is not considered safety critical, hence not supported. Again, if EASA has strong opinions about such a change, raise the issue with ICAO in order to have one uniform phraseology section. Para 1.4.8 Holding The proposed change to "should be" in stead of "is to be" is not supported. Where "should be" leaves an option, the phrase "is to be" is stronger and more clearly expresses that it actually is a "shall". Para 1.4.9 To cross a runway The proposed inclusion in e) REPORT RUNWAY (<i>number</i>) VACATED is supported, however the inclusion could also be relevant in para 1.4.7 taxi procedures. Para 1.4.10 Preparation for take-off The proposed amendment in v) is supported.

The proposed text in w) is supported and applicability for FIS/AFIS is supported. It is however not supported that the amendment in w) is applicable also for ATC. In an ATC environment where such situation exist, i.e. that runway is suddenly occupied/blocked, the phrase must be "GO AROUND", and if time permits and the operational situation warrants, the information may be passed to the pilot why he/she was instructed to go around, e.g. occupied/blocked runway.

Para 1.4.13 Entering an aerodrome traffic circuit

The inclusion of new c) and new g) is supported.

Para 1.4.14 In the circuit

The proposed amendments in c), d) and e) are not supported.

The phrases proposed to be included in para 1.4.14 are included in other phraseology-sections, and there is no need to repeat the phrases, although the phrases are to be used in a different context.

Para 1.4.19 Information to aircraft

See comment under para 1.4.10

i) shall only apply to FIS/AFIS - not to ATC.

Para 2.2.5 PAR approach

The deletion of PAR-phraseology in 2.2.5 and subpoints is supported.

response

With regard to the comment on Section 1.1.3: Noted

Please see the response to comment #1.

With regard to the comments on Section 1.2 and Section 1.3: Not accepted

The amendment is introduced to better specify the operational context and airspace for which the phraseologies are established, as explained in GM1 Appendix 1 to AMC1 SERA.14001. In these specific cases, some phraseologies in this Section are indicated as also applicable to Flight Information Service; hence the title needed to be amended.

With regard to the comment on Section 1.2.10: Noted

With regard to the comment on Section 1.4.8: Accepted

The text remains unchanged compared to the current Section 1.4.8 in Appendix 1 AMC1 SERA.14001.

With regard to the comment on Section 1.4.9: Not accepted

While in Section 1.4.9 point (e) the applicability of the phraseology to FIS (AFIS) supports a request to inform about the position of the aircraft (i.e. that it has vacated the runway), the phraseology in Section 1.4.7 point (y) is purposed to issue an instruction to the pilot (i.e. to vacate the runway), which is not applicable to FIS.

With regard to the comment on Section 1.4.10 point (v): Partially accepted.

Please see also the response to comment #52.

With regard to the comment on Section 1.4.10 point (w): Partially accepted



Please see the response to comment #52. It must be noted that the phraseology to instruct for a go-around is established in Section 1.4.18. Please see also the response to comment #56.

With regard to the comment on Section 1.4.13: Noted

With regard to the comment on Section 1.4.14: Noted

The phraseologies of concern are repeated in Section 1.4.10, but in a different context (Section 1.4.10 'preparation for take-off', Section 1.4.14 'in the circuit'). EASA confirms that such a duplication is appropriate to address the two scenarios in a coherent manner.

With regard to the comment on Section 1.4.19 point (i). Partially accepted

Please see also the response to comment #52.

With regard to the comment on Section 2.2.5: Noted

comment 203

comment by: IAOPA

11 1.1.3	'MINIMUM ENERGY' instead of 'MINIMUM FUEL'	In electrically powered aircraft, the fuel is electrical power. Whether the aircraft is conventionally powered or electrically powered, the power source has no relevance to the pilot's call that he is low on his source of power. Consequences for ATC do not significantly differ whether or not the aircraft is electrically powered or not. For clarity and simplicity the call should remain " LOW ON FUEL ", independent of the energy source. IAOPA agrees with the proponents of "Low on fuel" for harmonisation and simplicity purposes.
12 1.1.6	CHANGE YOUR CALL SIGN TO	Advise is to add lines with the pilot transmissions Apart from the instructions 'CHANGE YOUR CALL SIGN TO' and 'REVERT TO FLIGHT PLAN CALL SIGN' the advise is to add ' USE FULL CALL SIGN ' as an instruction to the pilot to refrain from using an abbreviated call sign in order to avoid confusion. IAOPA takes the position that in FIS/AFIS the instruction to change the callsign may be safely applied to avoid confusion with other aircraft.
12 1.1.7	Traffic Information ..to acknowledge traffic information	Many aircraft are equipped with Electronic Conspicuity and/or ADS-B traffic warning systems. A pilot may transmit " Traffic on TCAS (or other term for a non-TCAS approved device) but not in sight (or "not visual") "
20 1.2.10	Relaying clearances, instructions, and information	(ATC unit) CLEARs (or INSTRUCTs) (or INFORMs) (Call sign of aircraft to which it is relayed) (details of the clearance, instructions, or information)



26 1.4.7	Taxi Instructions .. general	<p>The possibility must be created for an FIS/AFIS to inform a pilot about the conditions of a taxiway and/or along the pilots route of taxiing;</p> <p>s) (ADVISE TO) TAXI WITH CAUTION (<i>description of condition</i>)</p> <p>For example:</p> <ol style="list-style-type: none"> 1. "Taxi with caution, slippery spots on taxiway Bravo"; 2. "Advise to taxi with caution, work in progress along taxiway Charlie"
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response

With regard to the comment on Section 1.1.3: Noted

Please see the response to comment #1.

With regard to the comment on Section 1.1.6: After thorough consideration, EASA considers that the proposal to make the phraseologies of Section 1.1.6 applicable also to FIS/AFIS could introduce a number of safety drawbacks and implementation issues (e.g. in uncontrolled airspace there are flights that operate without a flight plan). In general, radiotelephony procedures, including the change to call signs in the ATC service context, are established in point SERA.14055.

With regard to the comment on Section 1.1.7: Noted

The purpose of the comment is not clear. The development of electronic conspicuity and/or ADS-B traffic warning systems is not considered sufficiently mature to establish, in the context of SERA, specified and harmonised procedures and related phraseologies. EASA will monitor the evolution of these systems and consider further actions in the future, in the context of activities related to the actions established by the Best Intervention Strategy on Airborne Collision Risks established in the [EPAS for 2021-2025](#).

With regard to the comment on Section 1.2.10: Not accepted

Any radiotelephony communication begins with the call sign of the identifier of the aircraft to which it is addressed, followed by the call sign of the transmitting ATS unit. The proposal would introduce unnecessary repetition.

With regard to the comment on Section 1.4.7: Not accepted

Flight Information Service includes the provision of information regarding the conditions of the movement area, including taxiways and aprons. Considering the extent of the types of information at stake, EASA considers the introduction of detailed phraseologies for each of the identifiable cases disproportionate, also in consideration of point SERA.14001.

comment

205

comment by: *Pajala Airport*

When deciding on the proposed regulation according to NPA 2021-05 with effect from 2022-01-27 we notice a risk that the airspace users will not have time to adapt to the new phraseology in a desirable way. This may lead to an increased workload



for AFISO as well as the risk of misunderstandings as users do not have sufficient knowledge of the new standardized phraseology for AFIS.
Proposal for a new period for introduction is Q3 2022.

Section 1.1.9

The opportunity for AFIS to use position reporting exists today and improves the quality of flight information.

The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9

Section 1.1.15 paragraph 5

The possibility to ask IFR aircraft to state whether they can accept RNAV should also be able to be used at AFIS, as RNAV may be available at AFIS airports.

The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.15 paragraph 5.

Section 1.3.3 (Holding)

We propose that AFIS phraseology should include the possibility to suggest holding pattern for incoming VFR traffic. This is an important tool in Swedish flight information service to prevent collisions between VFR and IFR traffic in the vicinity of the airport.

This methodology is published in the Swedish national regulations.

It is proposed to add the following phrase:

(traffic information) SUGGEST HOLDING (published holding)

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service".

Section 1.4.6 d)

Parentheses and "and" are missing before QFE.

Since QFE according to GM1 ATS.TR.305(a);(b);(c) is a "needs phrase", square brackets around [and QFE] should also be inserted.

Section 1.4.7

In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.

This methodology is published in the Swedish national regulations.

The following phrases are suggested to be added:

(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)

The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;

Section 1.4.10 b);c);p)



The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.

The following phrases are suggested to be allowed for AFIS to use:

REPORT WHEN READY [FOR DEPARTURE]

ARE YOU READY [FOR DEPARTURE]?

TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES Section 1.4.7

In some situations, an aircraft may be suggested to maintain its position on a published stand or at apron. This is for instance, when one or more taxiways are occupied or are soon expected to be occupied by another aircraft, vehicle or person. In this situation, a standardized phrase is needed that suggests the aircraft to hold the position.

This methodology is published in the Swedish national regulations.

The following phrases are suggested to be added:

(traffic information) SUGGEST YOU HOLD AT (published stand or apron) DUE TO (reason)

The proposal is a tool enabling AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;"

Section 1.4.10 b);c);p)

The possibility for AFIS to use the phrases is seen as necessary to reduce the workload. The phrases are not linked only to air traffic control services.

The following phrases are suggested to be allowed for AFIS to use:

REPORT WHEN READY [FOR DEPARTURE]

ARE YOU READY [FOR DEPARTURE]?

TORA RUNWAY (number), FROM INTERSECTION (designation or name of intersection), (distance) METRES

Section 1.4.10 v), Section 1.4.14 c) and Section 1.4.19 j)

The phrase "runway (number) free" should according to NPA 2021-05 be replaced by the phrase "no reported traffic runway (number)".

Which criteria should be fulfilled when the AFISO may use the phrase "no reported traffic runway (number)".

Is it allowed to have traffic on pavements and taxiways closer than the published holding points and use the phrase?

In such cases, does this affect the view or definition of runway incursion?

Definition is required of "no reported traffic runway"

Furthermore, the phrases "no reported traffic" and "no reported traffic runway [number]" are very similar, which will in all probability lead to confusion and uncertainty among airspace users.

With this phraseology, you may end up in a situation where you announce incoming IFR traffic at the final as follows: "Traffic, C172 on downwind for touch and go runway 19, no reported traffic runway 19."

The following phrases are proposed to replace those mentioned in 1.4.10 v), 1.4.14 c), 1.4.19 j):



RUNWAY (number) FREE

This methodology is published in the Swedish national regulations.

Criterion for being able to announce the runway free is as follows:

No aircrafts, vehicles or persons or other obstacles are present on the runway or closer to the runway than the distance that applies to the established holding points.

Section 1.4.10

Phraseology for aircraft to announce that right turn after takeoff is intended to be missing. The information is important for AFISO to know as the procedure is not standardized and can affect other traffic in the vicinity of the airport.

It is proposed to add the following phrase:

***WILL MAKE RIGHT TURN AFTER DEPARTURE**

The proposal is a tool that enables AFIS to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (b)(2) "Scope of flight information service"

Section 1.4.13

Aircraft should report the number people on board when there is no current flightplan. Otherwise, it must be requested by AFISO in case the aircraft does not state this. The number of people on board will be of great necessity in case of an abnormal event, accidents or incident.

The following phrase is proposed to replace 1.4.13 a):

***a) [aircraft type] [PERSONS ON BOARD] (position) (level) [ESTIMATING (aerodrome) AT (time)] FOR LANDING**

Section 1.4.13 c);g)

The traffic information is significantly higher in priority than runway in use and weather information, that is why the traffic information should be communicated before other information.

Traffic information is proposed to precede other information in subsection 1.4.13 c);g)

Section 1.4.13 c)

The phraseology does not comply with GM2 ATS.TR.305(a);(b);(c) Scope of flight information service which should be overseen.

Section 1.4.19

We propose phraseology for notifying aircraft that there is no ATC and clearances cannot be given.

It is proposed to add the following phrase:

AERODROME CONTROL SERVICE NOT AVAILABLE [I SAY AGAIN, AERODROME CONTROL SERVICE NOT AVAILABLE] (followed by additional information, e.g. type of service provided)

Section 1.4.20

We propose that AFIS phraseology should include phraseology for AFIS regarding handling of aircraft on the ground, so-called "taxi information".



	<p>The following phrases are suggested to be added: TAXIWAY (name) [or TAXIWAYS] AVAILABLE FOR TAXI TO APRON [TAXIWAY (NAME) OCCUPIED (traffic)] TAXIWAY AVAILABLE TO HOLDING POINT RUNWAY (number) RUNWAY (number) AVAILABLE FOR TAXIING [AND LINE-UP RUNWAY (number), REPORT WHEN READY]</p> <p>This methodology is published in the Swedish national regulations.</p> <p>In order to comply with the requirement of regulation (EU) 2017/373 ATS.TR.305 (c)(1) "collision hazards with aircraft, vehicles and persons operating on the maneuvering area;" it is also requiring use of the following phraseology: TAXIWAYS OCCUPIED (traffic) (used when taxi is not possible)</p>
response	Please see the responses to the various issues in comment #143, which are identical to this comment.
comment	<p>207 comment by: ENAIRE</p> <p>1.1.3 (Minimum fuel/energy): While the response of ATC/FIS to this message could not represent a difference, it could transmit distinctive information about the type of aircraft, its performance and needs. Agree to add "ENERGY".</p>
response	<p>Noted</p> <p>Please see the response to comment #1.</p>
comment	<p>214 comment by: AFIS DEPARTMENT</p> <p>1.1.9 POSITION REPORTING a) report at...(significant point): applicable to AFIS (when an aircraft is in ATZ and in aerodrome frequency)</p> <p>1.3.2 k) Report runway (lights) in sight : applicable to AFIS (When the visibility is low and the a/c is in ATZ)</p> <p>1.3. 2. s) Maintain own separation : applicable to AFIS When more than 2 aircrafts are in ATZ and in aerodrome frequency.</p> <p>1.4.7- 1.4.8 TAXI PROCEDURES- HOLDING-TO CROSS A RUNWAY We provide traffic/meteo information only</p> <p>1.4.10. Information on the Rwy status v) No reported traffic runway Instead of" No reported traffic" –"Runway (number) free" or "the runway(number)is clear"</p> <p>1.4.11. When the instruction is given by the ATC UNIT, AFIS UNIT relays the instruction. When there is an emergency reason (entry of an animal or a vehicle etc) Afis Unit reports the proble</p>
response	With regard to the comment on Section 1.1.9: Not accepted



Please see the response to comment #144.

With regard to the comment on Section 1.3.2 point (k): Not accepted

The report 'runway (lights) in sight' in the context of AFIS is not explicitly required. It is considered covered by the phraseologies related to position report.

With regard to the comment on Section 1.3.2 point (s): Not accepted

AFIS units are not responsible for providing separation in uncontrolled airspace between aircraft.

With regard to the comment on Sections 1.4.7–1.4.8: Noted

With regard to the comment on Section 1.4.10: Noted

With regard to comment on Section 1.4.11: Noted

The text of the comment is incomplete, and its purpose is not understood.

comment	217	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.1.3: I would tend not to use "minimum energy". It could be misunderstood in the sense of "electrical failure/problems", but the very nature of the situation which is similar to "minimum fuel" could remain obscured.	
response	Noted Please see the response to comment #1.	

comment	218	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.2.10: "THAT IS" should be optional, to be harmonised with 1.4.10.	
response	Accepted Text amended accordingly.	

comment	219	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.2.10: Augment "clearances, instructions, and information" by "approvals". Consequently, in the phraseology add "(or APPROVES)" (will be required in section 1.4.3).	
response	Not accepted The text of Section 1.4.3 has been amended, and the notion of AFIS approval has been removed. Please see also the response to comment #47.	

comment	220	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.4.3: Replace "d) ATC ADVICES START-UP APPROVED" by "d) (ATC unit) APPROVES START-UP" and "f) ATC ADVICES START-UP AT (time)" by "f) (ATC unit) APPROVES START-UP AT (time)". An advise is not exactly an approval and leaves ambiguity whether the pilot may start-up or not.	
response	Noted	

Please see also the response to comment #47.

comment	221	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.4.6: It is unclear which purpose the mentioning of a/the runway serves in an AFIS context and what it implies when being mentioned without any further information.	
response	Noted The provision of information regarding the aerodrome is a task of the AFIS units.	

comment	222	comment by: <i>Dimitris ARVANITIS</i>
	Section 1.4.13: It is unclear which purpose the mentioning of a/the direction of circuit and a/the runway serves in an AFIS context and what it implies when being mentioned without any further information.	
response	Noted The information concerning the direction of the circuit is optional (as indicated by the convention of indicating optional phraseologies between squared brackets).	

comment	223	comment by: <i>RENE FANKHAUSER</i>
	<p>1.1.2 We issue -according existing- procedures "joining clearances" (on behalf of ACC ZRH) for departing IFR TFC at LSZS. Therefore it is important to be allowed to issue level instructions! There is a restricted aerea close to LSZS and the prohibited zone during world economic forum/WEF.</p> <p>ACAS RA ROGER is not allowed (even if this means only "i understood"). So we just don't comment and ignore such a message??</p> <p>1.1.9 RMK: "next report at" (1.1.9) and "report passing" (1.1.10) is in real life the same! The phrase "report position" is missing here. For AFIS LSZS very important to be able to issue traffic information in the narrow valley! So it is essential to issue a "report position" outside the circuit and to ask A/C about its position!</p> <p>1.4.3 Issue "start-up approved" by AFIS is essential, especially during hight traffic in wintertime. Coordination procedures are already quite complicated and time consuming that an additional phone call to ATC is a no go! (point-to-point telephone connection with ATC!)</p> <p>1.4.4 / 1.4.7 / 1.4.8 It cannot be in the interests of safety that it should no longer be possible to issue taxi clearances/instructions as well as approval for backtrack. AT LSZS every A/C has to cross the active RWY for departure and as well (depending on RWY-in-use) after landing!!</p>	



It is important to avoid unexpected missed approaches in the narrow valley as a result of this regulation!

I was for 5 years FISO at LSZS after my carrier as ATCO and I can provide you with a lot of examples in which this regulation would lead to unsafe situations!!

1.4.10

To get a release for DEP from ATC, we need a "ready for departure" and therefore have to ask accordingly!

1.4.16

As e.g. "touch and go" are according to local operating regulations prohibited Saturday/Sunday the FISO must be able to reject such a pilot request! Pilots performing an IFR approach expect at least a "land at your discretion" (used successfully in the UK for years...) or a "runway free"!

2.2.4.5 (b)

To know when pilots have the runway in sight my be very helpful and does not affect safety...!

6.1

FMP and ATC skyguide will not be very amused if AFIS LSZS doesn't care regarding SLOTS...!

So at least a "STBY" must be possible in context of start-up requests!

response

With reference to the comment on Section 1.1.2, Section 1.4.3 and Section 1.4.10: Not accepted

In general, it is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service. FIS/AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose phraseologies in Section 1.2.10 have been introduced, but FIS/AFIS are not allowed to issue clearances and instructions.

With reference to the comment on Section 1.1.2 on ACAS RA: Noted

The phraseology refers to specific scenarios in the context of provision of ATC service. In the context of provision of FIS in uncontrolled airspace, FIC and AFIS units are not required to undertake specific actions upon receipt of an ACAS RA notification. The acknowledgement of such a message, even by a FIC or an AFIS unit, is included in the phraseology for generic receipt of a radiotelephony message (see point SERA.14045).

With reference to the comment on Section 1.1.9: Noted

The phraseology 'report position' in the context of AFIS is not explicitly required. It is considered covered by the existing phraseologies related to reporting. Please see also the response to comment #37.

With reference to the comment on Sections 1.4.4, 1.4.7 and 1.4.8: Noted

Please see the responses to comments #50 and #71.

With reference to the comment on Section 1.4.16: Noted



AFIS units are not allowed to issue clearances, including those for instrument procedures or for landing.

With reference to the comment on Section 2.2.5.4: Noted

The phraseology referred to in the comment is established in the context of surveillance radar approach (SRA), which is exclusively allowed in the context of the provision of ATC service, and not for the provision of FIS.

With reference to the comment #61: Noted

Please see the response to comment #61.

comment

224

comment by: *Icelandic Transport Authority*

1.1.1 Description of levels - Note. The note is ATC focused. Suggest either changing the note to cover AFIS as well or add note for AFIS, e.g. report Altitude or Height.

1.1.3 Minimum fuel/energy

Icetra suggest pilots of electrically powered aircraft should also use the term 'MINIMUM FUEL' instead of 'MINIMUM ENERGY' for harmonisation and simplicity purposes

response

Noted

With regard to the comment on Section 1.1.1: Noted

The note includes an illustrative example applicable to the provision of ATC service. The phraseologies in Section 1.1.1 may be used in the context of the provision of FIS/AFIS as well.

With regard to the comment on Section 1.1.3: Noted

Please see the response to comment #1.

comment

225

comment by: *ROMATSA*

1.1.3 Minimum fuel/ energy (Page 11)

In our opinion, using the term „ENERGY” is likely to create confusion with the concept of „energy management during approach” which is usually associated with the assessment or with the management of the **aircraft's energy condition**.

In addition, we consider that the term “FUEL” could be used broadly for all types of power sources. Alternatively, we propose the term “BATTERY PERCENTAGE” instead of “ENERGY”.

Therefore, we are expressing our reservations on using the term „ENERGY” as foresee in these AMC/GMs and we propose EASA to consider further clarifications / alternatives for the proposed amendment.

1.1.4 Transfer of control and/or frequency change (Page 11)

We believe that adding the possibility that FISO/AFISO to approve the change of frequency for aircraft operating in RMZ, could be associated by the pilot with ATC



service provision, instead of FIS/AFIS. In our opinion, these situations could be avoided by identifying another term (e.g.ATS UNIT available on frequency xxx.xxx).

We suggest EASA to consider further clarifications / alternatives for the proposed amendment.

1.1.6 Change of call sign (Page 12)

We appreciate EASA’s intention to include the possibility for the FISO/AFISO to advise the pilot to change the call sign in case of potential confusion when communicating with other aircraft with similar call signs. However, we consider that the usage by FISO/AFISO of direct instruction (as the case for ATC) is likely to create the impression that the provided service is ATC, instead of FIS/AFIS.

We propose adding “SUGGEST/ ADVISE” to create a distinction between ATC and FIS/AFIS. E.g.

SUGGEST/ ADVISE CHANGE YOUR CALL SIGN TO (new call sign) [UNTIL FURTHER ADVISED];
SUGGEST/ ADVISE REVERT TO FLIGHT PLAN CALL SIGN (call sign) [AT (significant point)].

response With regard to the comment on Section 1.1.3: Noted

Please see the response to comment #1.

With regard to the comment on Section 1.1.4: Partially accepted

Following further analysis, EASA has determined that the current phraseologies in Section 1.1.4, which remain unchanged, are only applicable to the context of the provision of ATC service, as they are ‘instructions’ by default and as such they are established for the operational context ‘Transfer of control and/or frequency change’ which is not applicable to FIS. As an example, even in an RMZ established in uncontrolled airspace, the pilot is not required to request authorisation to change frequency to FISO/AFISO.

For flights in uncontrolled airspace, including those operating to/within/from RMZ, the transfer of communication between ATS units and the approval for frequency change are not required, unless when it is necessary to relay related instructions issued by an ATC unit; in this case, the phraseologies in Section 1.2.10 should be applied.

FIC/AFIS units may provide information to pilots about the frequency in use at relevant ATS units.

With regard to the comment on Section 1.1.6: Please see the responses to comments 203# and 71.

comment 227 comment by: *Fintraffic Air Navigation Services*

1.1.2 AFIS/FIS should be allowed to ask for 4) REPORT LEAVING (or REACHING, or PASSING) (level)

response Not accepted

Please see the response to comment #38.



comment	228	comment by: <i>Fintraffic Air Navigation Services</i>
	1.1.2 s) ROGER AFIS / FIS should be allowed to acknowledge a TCAS RA	
response	Noted Please see the response to comment #223.	
comment	229	comment by: <i>Fintraffic Air Navigation Services</i>
	1.1.3 Minimum fuel is a good general term, regardless of energy source	
response	Noted Please see the response to comment #1.	
comment	230	comment by: <i>Fintraffic Air Navigation Services</i>
	1.2.6 EXPECT CLEARANCE (type of clearance) AT (time). AFIS/FIS delivers / relays clearances and should be able to use this phrase.	
response	Not accepted It is expected that Member States designate the appropriate ATS to support safe operations, either in the context of an aerodrome or en-route. When a Member State selects the provision of FIS, it is expected that the FIC or AFIS unit provide the services according to the principles and provisions established for that service. FIS/AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose phraseologies in Section 1.2.10 have been introduced, but FIS/AFIS units are not allowed to issue clearances and instructions.	
comment	231	comment by: <i>Fintraffic Air Navigation Services</i>
	1.4.7 ...after landing: Proposal to add a phrase for AFIS RUNWAY FREE FOR BACKTRACK. ...general: s) s) TAXI WITH CAUTION should be added to AFIS phraseology	
response	With regard to the comment on 'after landing': It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the services according to the principles and provisions established for that service. In the context of AFIS, all pilots are supposed to be aware of the traffic situation by various means, including but not limited to information provided by the AFIS unit, by monitoring the frequency, by visual observation. The AFIS unit does not manage the runway availability but provides relevant traffic information. With regard to the comment on point (s): The AFIS units does not issue instructions, but information. It is expected that in the AFIS context, the provision of relevant information on the status of and the traffic on the manoeuvring area would achieve the intended objective as formulated in the comment.	

comment	232	comment by: <i>Fintraffic Air Navigation Services</i>
	1.4.10 b) REPORT WHEN READY [FOR DEPARTURE]; should be added to AFIS phraseology	
response	Not accepted Please see the response to comment #72.	
comment	233	comment by: <i>Fintraffic Air Navigation Services</i>
	1.4.10 ...information on the runway status v) NO REPORTED TRAFFIC RUNWAY (number). To be considered if the phrase RUNWAY IS FREE (FOR DEPARTURE) could be used as an alternative	
response	Noted Please see the response to comments #52 and #73.	
comment	234	comment by: <i>Finnish Transport and Communications Agency</i>
	On section 1.1.3 minimum fuel/energy: Finnish Transport and Communications Agency prefers the term "MINIMUM FUEL" instead of MINIMUM ENERGY. This would be beneficial for harmonisation purposes. We see that electric vehicles use alternative fuel (electricity in this case), and it would fit under the current "MINIMUM FUEL" terminology.	
response	Noted Please see the response to comment #1.	
comment	235	comment by: <i>Finnish Transport and Communications Agency</i>
	Section 1.1.6 on "Change of call sign": Finnish Transport and Communications Agency agrees with the proposal of section 1.1.6. Instructing the aircraft to change its call sign by (A)FISO for the sake of safety is already in use in Finland.	
response	Noted Please see the response to comment #203.	
comment	236	comment by: <i>Slawomir BALAZY</i>
	2. ATS SURVEILLANCE SERVICE PHRASEOLOGIES 2.1.8 Traffic information and avoiding action	
	<u>It seems reasonable to allow the use of Traffic information phraseology to the full extent also for FIS/AFIS with the note that avoiding action should be preceded by the word SUGGEST.</u>	
	As the basis for such a provision: ATM-ANS (Regulation (EU) 2017/373) ANNEX IV — Part-ATS SUBPART B GM2 ATS.TR.305(b)(2) Scope of flight information service	

	<p>ATS SURVEILLANCE SERVICE — INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should, as far as practicable:</p> <p>(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 FIS officer or the AFIS officer, the situation warrants, a course of avoiding action should be suggested; and</p> <p>(b) be notified when the conflict no longer exists.</p>
response	<p>Noted</p> <p>The use of phraseologies such as ‘suggest’ represents de facto a form of advisory service which is not compatible with FIS. Local implementation of advisory-like service could be pursued when in accordance with the framework defined by the EU legislation. The mentioned GM addresses a peculiar situation (i.e. identified IFR traffic outside controlled airspace operating on a conflicting path with another aircraft). This situation does not constitute per se a justification to introduce a generally applicable set of phraseologies with the notion of ‘suggestions’ which, as said above, does not pertain to FIS. Such situation could be addressed by the use of plain language, according to the specific circumstances.</p>
comment	<p>237 comment by: <i>Danish Civil Aviation and Railway Authority</i></p> <p>Para 1.1.3 Minimum fuel</p> <p>The proposal to include MINIMUM ENERGY is not supported. For harmonisation and simplicity the term MINIMUM FUEL should be used also for electrically powered aircrafts. As the technology still seems to be in a very early stage it is advisable to wait for a harmonised implementation between EU and ICAO of a change to phraseology to be used in a safety critical phase.</p> <p>Para 1.1.6 Change of call sign</p> <p>The proposal to include the phraseologies for FIS is supported. The procedure is not yet implemented in our national operational context but it is seen as relevant for FIS.</p> <p>Para 1.1.9 Position reporting</p> <p>Suggest including applicability for FIS. The use of position reporting is of relevance for FIS and in our national context we have mandatory reporting points in uncontrolled airspace. It is as relevant for AFIS/FIS to ask for specific position reporting or omissions as it is for ATC. FIS would be able to ask A/C to omit position reports i.e. to control frequency workload.</p> <p>Para 1.1.13 RVSM operations</p> <p>Suggest including applicability for FIS in a). It could be of relevance for AFIS/FIS to ascertain RVSM approval status of an aircraft, moreover no clearance is included. Example of use could be when FIS wants to verify the flight plan data or on request from ATC.</p> <p>Para 1.4.3 Starting procedures</p> <p>Suggest including applicability for FIS in c). At some aerodromes local regulations states that start-up needs to be approved by AFIS.</p>



Para 1.4.7 Taxi procedures

Suggest including AFIS phraseologies for taxi. “Suggest taxi to...” as an AFIS alternative to c) and e)-j). Suggesting taxi routes would allow AFIS to provide information useful for facilitating an efficient traffic flow.

Suggest including applicability of s) for FIS. This phrase would be relevant and useful in relation to information about e.g. slippery taxi-/runways.

Para 1.4.9 To cross a runway

The proposed inclusion in e) REPORT RUNWAY (*number*) VACATED is supported, however the inclusion could also be relevant in para 1.4.7 taxi procedures.

Para 1.4.10 information on the runway status

For a), b) and c) suggest including applicability for FIS. These phrases are relevant and useful for AFIS to plan ahead and provide the best possible information to involved aircrafts.

Suggest changing the phraseology in v) to “NO TRAFFIC ON [THE] RUNWAY (*number*)”. The word “REPORTED” as proposed seems to be excessive/unnecessary and indicates doubt. The AFIS operator has line of sight to the runway and can conclude whether there is traffic on the runway or not.

The proposed text in w) is supported for FIS. However, the applicability for ATC is not supported. In case of a blocked/occupied runway take-off clearance will not be given. The proposed text constitutes a difference from ICAO phraseology and should be avoided.

Para 1.4.12 Turn or climb instructions after take-off

Suggest including applicability for FIS in b). As standard an aircraft operated on or in the vicinity of an aerodrome shall make all turns to the left after taking off. Acceptance of right turns is of relevance for AFIS. In our national operational context, AFIS is allowed to approve right turns, under given circumstances.

Para 1.4.14 In the circuit

Suggest changing the phraseology in c) to “NO TRAFFIC ON [THE] RUNWAY (*number*)”. Same rationale as above for 1.4.10.

The applicability of c) for ATC is not supported. This phrase is applicable to AFIS only – as indicated in 1.4.10 and 1.4.19.

Para 1.4.19 other traffic j)

Suggest changing the phraseology in j) to “NO TRAFFIC ON [THE] RUNWAY (*number*)”. Same rationale as above for 1.4.10 (v).

The applicability for ATC in i) is not supported. Same rationale as above in 1.4.10 (w)

Para 2.1.1 Identification of aircraft

The proposed text in g) is supported. However, the applicability for ATC is not supported. The phraseology for ATC should be covered by f) hence the new g) seems to be irrelevant for ATC and would constitute a difference from ICAO phraseology.

Para 2.1.6 Speed control

Suggest including applicability for FIS in a). Information about speed of an aircraft could be useful knowledge for AFIS and other pilots for planning purposes and for issuance of traffic information.

response

Para 2.1.7 Position reporting

Suggest including applicability for FIS. Rationale is the same as in 1.1.9 above.

Para 2.1.8 avoiding action

Suggest including FIS phraseology to suggest avoiding actions in addition to ATC phraseology in e). In a safety critical situation, it should be possible for FIS to provide suggested avoiding actions. I.e. SUGGEST TURN LEFT DUE TRAFFIC (information)

Para 2.2.5 PAR approach

The proposed deletion is supported.

With regard to the comment on Section 1.1.3: Noted

Please see the responses to comments #1.

With regard to the comment on Section 1.1.6: Noted

Please see the response to comment #203.

With regard to the comment on Section 1.1.9: Not accepted

Please see the response to comment #144.

With regard to the comment on Section 1.1.13: Not accepted

The scenario may be covered by the use of plain language and/or the phraseologies in Section 1.2.10 on relaying of ATC clearances or instructions.

With regard to the comment on Section 1.4.3: Not accepted

Please see the response to comment #47.

With regard to the comment on Section 1.4.7: Not accepted

Please see the responses to comments #50 and #71.

With regard to the comment on Section 1.4.10 and 1.4.12: Not accepted

Please see the response to comment #52. It is emphasised that AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but AFIS units are not allowed to issue clearances and instructions.

With regard to the comment on Section 1.4.14: Noted

Please see the response to comment #52.

With regard to the comment on Section 1.4.19 point (i): Not accepted

Please see the response to comment #52.

With regard to the comment on Section 1.4.19 point (j): Not accepted

Please see the response to comment #52.

With regard to the comment on Section 2.1.1: Not accepted

Please see the response to comment #64.

With regard to the comment on Section 2.1.6: Not accepted

Please see the response to comment #59.



With regard to the comment on Section 2.1.7: Not accepted

Please see the responses to comments #37 and #144.

With regard to the comment on Section 2.1.8: Noted

Please see the response to comment #236.

With regard to the comment on Section 2.2.5: Noted

comment

240

comment by: PANSA

Page	Description	PANSA comment
11.	1.1.3 Minimum fuel/ energy	We suggest not to introduce the concept of ENERGY as it may create confusion. The question "How much FUEL remaining?" guarantees a simple answer that the fire service are interested in. In the case of ENERGY, we do not have this certainty.

response

Noted
Please see the response to comment #1.

comment

241

comment by: CANSO

1.1.4 Transfer of control and/or frequency change

We believe that adding the possibility that FISO/AFISO to approve the change of frequency for aircraft operating in RMZ, could be associated by the pilot with ATC service provision, instead of FIS/AFIS. In our opinion, these situations could be avoided by identifying another term (e.g.ATS UNIT available on frequency xxx.xxx). We suggest EASA to consider further clarifications / alternatives for the proposed amendment.

response

Partially accepted
Please see the response to comment #225.

comment

243

comment by: Europe Air Sports

Page 11/48

1.1.3 : We are slightly concerned about the phrase "minimum energy", because it can in theory refer to either propulsion energy or the aircraft's kinetic energy state. To avoid this potential ambiguity / source of confusion, it seems better to keep using "Minimum Fuel", regardless of the source of power (it could be coal, fuel, hydrogen, electricity, ...).. . If this wording "Fuel" needs to be changed, then the wording



response	"Minimum Endurance " is closer to the nature of the concern expressed by the pilot, and should be preferred.
response	Noted Please see the response to comment #1.
comment	244 comment by: <i>Europe Air Sports</i> Page 12/48 1.1.6 : We agree to this proposal.
response	Noted Please see the response to comment #203.
comment	245 comment by: <i>Europe Air Sports</i> Page 14/48 1.1.9 (a) FIS should also be allowed to use this wording, for instance when traffic exits an RMZ.
response	Not accepted Please see the response to comment #144.
comment	246 comment by: <i>Europe Air Sports</i> Page 20 and 21 / 48 1.3.1 : For the same reasons as per 1.2.1, AFIS should be permitted to use the phraseology to give departure informations, as already available in flight documentation
response	Not accepted In general, it is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service. In this specific case, AFIS units are not allowed to issue instructions related to established procedures which, as being published in the relevant aeronautical information or available in-flight documentation, are already known by pilots, nor are they allowed to issue clearances.
comment	247 comment by: <i>Europe Air Sports</i> Page 24/48 1.4.4 : <u>title</u> should be "Aircraft / ATS", and not "Aircraft / ATC"

response Noted
As explained in the response to comment #48, the text of Section 1.4.4 has been amended compared to that proposed with NPA 2021-05. It applies only to ATC service.

comment 248 comment by: *Europe Air Sports*
Page 35/48
2.1.7 : Position reporting : same as 1.1.9 (a) : FIS should be able to use "Next Report" , for instance when traffic is leaving RMZ/TMZ.

response Not accepted
Please see the response to comments #37 and #144.

comment 251 comment by: *CAA Norway*

We would like to elaborate about the phraseologies that has led to a more mature and safe AFIS provision in Norway:

1 – «RWY FREE» vs. NO REPORTED TRAFFIC»

The abovementioned phraseology «RWY FREE» is used in several states, especially in the Nordic States where there is a long tradition with AFIS. The training organisation Entry Point North AB have also specialised their AFIS-courses with regard to The EUROCONTROL Manual of AFIS (2010), coordinated their activities with the CA's, and have achieved approvals for this phraseology which is associated to their training courses.

There are some positive safety aspects and advantages with «RWY FREE» that might not be matched with «NO REPORTED TRAFFIC RUNWAY» (1.4.19 J)). That should indicate that one chooses the phraseology that gives the best safety level:

Advantages/safety aspects - RWY FREE:

Highly important information for a pilot on a very critical part of the flight
Highlight the traffic information as important and unique information for the pilot
"NO REPORTED TRAFFIC ..." frequently used

Only one at a time can have this information, the other will have "RWY OCCUPIED"

Special attention is given by AFIS personnel when using "RWY FREE" (focus on other traffic, scanning the RWY)

CAA Norway suggest to use the phraseology «RWY FREE» to clearly indicate the unique information and ensure that only one aircraft at a time has been given this traffic and safety information from the AFIS unit. This phrase will also highlight that the RWY is visually observed by AFIS unit and no other aircraft, vehicles, birds/animals or FODs are present on the RWY.

«RWY OCCUPIED» is a likewise unique traffic/safety information given by AFIS to indicate the opposite of «RWY FREE» that the RWY of safety reasons is occupied and not available.



2 – «(reason when the RWY is occupied) RUNWAY AVAILABLE FOR LINE UP (or TAXI, or TOWING)» - related to 1.4.10 preparation for take-off

Norway has a national phraseology «(reason when the RWY is occupied) RUNWAY AVAILABLE FOR LINE UP (or TAXI, or TOWING)».

The rationale behind this phraseology was that the ANSP's missed a suitable and safe phraseology to give advantages regarding availability or occupancy of the RWY. In close cooperation with the CA, a third party performed a formal risk analysis of this phraseology with relevant stakeholders involved (ANSP and operators), and CA participating as an observer.

There may be justifiable reasons for AFIS personnel to use this phraseology, instead of «RWY OCCUPIED» (1.4.10 w)).

The phraseology has the advantages that a pilot may enter the RWY, without departing.

Examples to justify this are when you have inspection vehicles on the RWY, snowclearance in progress, or back-tracking of landing aircraft.

Other advantages may exist for ground personnel / other aircraft involved.

There are obvious reasons for a pilot: less delay, more efficiency, but still safe and a high focus on situational awareness as there are the following conditions for use:

The «RWY AVAILABLE FOR LINE UP/TAXI, TOWING» may only be used when there exist a TWR, and the following conditions are fulfilled:

1. Manoeuvring area is visible from TWR,
2. All involved parties on ground are visible from TWR, and
3. All involved on ground are visible for each other

CAA Norway would prefer to retain the maturity level of today's AFIS provision, instead of taking a step backward. We suggest to add this phraseology together with the conditions for use under *1.4.10 preparation for take-off* as an option for FIS with TWR.

Other comments:

The phraseology «REPORT VISUAL» (1.3.2.j) can be useful for FIS in determining WX conditions.

The phraseology «CONFIRM RVSM APPROVED» (1.3.2.p) and q)) can be useful for FIS on behalf of ATC.

The phraseology «ATC ADVICES START-UP APPROVED» 1.4.3.d): May confuse pilots regarding AFIS vs ATC. ATC is not in position to control start up for pilots at AFIS units. Should not be used by AFIS as it may introduce safety issues. Should be removed.



response

AFIS is not allowed to give push-back or start-up approval in the proposed amendment.

For discussion: Should AFIS be in position to give pushback approval and start-up approval when the airport management decides so for safety reasons? If it is published in AIP and the AFIS is given the approval from the airport management, why not?

Identification methods (surveillance) that do not require a «control message» or manoeuvre by the pilot should be available for use by AFIS units with surveillance equipment, (2.1.1 a) and c)).

In general, it is expected that Member States designate the appropriate ATS to support safe operations, either in the context of an aerodrome or en-route. When a Member State selects the provision of FIS, it is expected that the FIC or AFIS unit provide the service according to the principles and provisions established for that service.

EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning 'information on the actual use on the runway', which is included in Section 2.3 of NPA 2021-05.

With regard to the comment on Section 1.3.2 paragraph (j): Noted

Determining the meteorological conditions is not an ATS task.

With regard to the comment on Section 1.3.2 paragraphs (p) and (q): Please see the response to comment # 237.

With regard to the comment on Section 1.4.3 paragraph (d): Not accepted

Please see the response to comment #47.

With regard to the comment on 'push-back' and 'start-up approval': Not accepted

Please see the responses to comments #47 and #48.

With regard to the comment on Section 2.1.1 paragraphs (a) and (c): Accepted

The text is amended to allow the use of the phraseologies in points (a) and (c) to support the related methods of identification in the context of FIS.

comment

252

comment by: *European Transport Workers Federation - ETF*

Section 1.1.2 Level changes, reports, rates

REPORT LEAVING (or REACHING, or PASSING) (level)

It seems relevant to be applicable to FIS function as well. Reporting a position vertically is sometimes needed to enhance situational awareness or in order to transfer a traffic to another unit.(e.g IFR to APP) as described in section 1.1.4

response

Not accepted

Please see the response to comment #38.



comment 253 comment by: *European Transport Workers Federation - ETF*

Page 11 :

Section 1.1.3 Minimum fuel/energy

b) ROGER [NO DELAY EXPECTED or EXPECT (delay information)]

It is unclear that FIS unit will not provide information on delay although it is stated in the note. In some instances, information on delay (to enter controlled airspace for example) may be part of FIS.

Is it possible to split the phraseology as it is done in others sections ?

response Noted

The explanatory note added to the phraseology in Section 1.1.3 clarifies that it is not applicable to FIS. Possible delays applicable to specific flights notified by the ATC units to the relevant FIC or AFIS unit are to be communicated to such flights by using the phraseologies in Section 1.2.10.

comment 254 comment by: *European Transport Workers Federation - ETF*

Section 1.1.4

Use of contact is an instruction to be used only when contact is mandatory, otherwise we suggest to have flight information available with (indicative) on (frequency/channel).

Similarly use of remain on this frequency is not to be used when radio contact is not mandatory.

response Noted

Please see the response to comment #225.

comment 255 comment by: *European Transport Workers Federation - ETF*

Section 1.1.15 and others (Confirm RVSM approved, 8.33 MHz, indication of route, issue of clearance,...)

In many occasions in the document some phraseology is limited to ATC but is useful to relay instructions from ATC via FIS. Suggestions for this section :

Page17 :

ATC unable to assign an arrival or departure procedure requested by the pilot the type of on-board RNAV equipment
ATC unable to assign an RNAV arrival or departure

(ATC unit) IS
UNABLE TO ISSUE
(designator)
DEPARTURE DUE TO
RNAV TYPE

In case of a departure AFISO have to relay the ATC clearance (or request) therefore the phraseology related should added. (which has been added in section 1.20.10)

procedure requested by the pilot confirmation whether a specific RNAV arrival or departure procedure can be accepted	(ATC unit)IS UNABLE TO ISSUE DEPARTURE ADVISE IF ABLE (designator) DEPARTURE	
---	--	--

Furthermore for (RNAV) procedures (including SIDs and STARs) : some (and even all) the procedure may be out of controlled airspace and the proposal does not include any phraseology covering this situation.

response

Not accepted
 Please see the responses to comments #144, 237 and #238.
 FIC/AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but FIC/AFIS units are not allowed to issue clearances and instructions.

comment

256 comment by: *European Transport Workers Federation - ETF*
 Section 1.2.10
 THAT IS should be optional in b)
 Approvals also seems to have been forgotten.

response

Accepted
 Please see the response to comment #218.

comment

257 comment by: *European Transport Workers Federation - ETF*
 Section 1.1.9
 Position reporting in flight information areas or in ATZ should be used for FIS as well.

response

Not accepted
 Please see the response to comment #144.

comment

258 comment by: *European Transport Workers Federation - ETF*
 Section 1.3.2
 Visual approach after transfer to AFIS unit may be part of what the AFIS units may approve (with coordination with ATC as applicable).

response

Not accepted



Visual approach may only be cleared by ATC units. The phraseologies to be used by the FIC/AFIS units for relaying clearances and instructions received from ATC units are established in Section 1.2.10.

comment 259 comment by: *European Transport Workers Federation - ETF*

Section 1.4.3

Further clarity in phraseology for relaying start-up instructions by AFIS is needed such as introduction of unit call sign of ATC unit approving/instructing/...

response

Noted

Please see the response to comment #47. The phraseologies to be used by FIC/AFIS units for relaying clearances and instructions received from ATC units are established in Section 1.2.10, including the mention of the ATC unit that issues the clearance or instruction.

comment 260 comment by: *European Transport Workers Federation - ETF*

Section 1.4.4

What about the Apron Management Service ? Which phraseology should be used then ?

What about when pushback is between apron and taxiway ?

response

Noted

Please see the response to comment #48.

comment 261 comment by: *European Transport Workers Federation - ETF*

Section 1.4.5

So towing at aerodrome where AFIS is provided never happens or plan language should be used ? Why ?

response

Noted

Please see the response to comment #49.

comment 262 comment by: *European Transport Workers Federation - ETF*

Section 1.4.7

It seems that no phraseology exists applicable to FIS in terms of taxi procedures. (e.g REPORT AT HOLDING POINT) although it exists to ensure that the runway has been vacated.

Please define taxi phraseology for AFIS.

response

Noted

Please see the responses to comments #50 and #71.



comment	<p>263 comment by: <i>European Transport Workers Federation - ETF</i></p> <p>Section 1.4.12</p> <p>Reporting a position vertically is sometimes needed to enhance situational awareness or in order to transfer a traffic to another unit.(e.g IFR to APP) as described in comment to section 1.1.4</p>
response	<p>Noted</p> <p>Section 1.4.12 does not include any phraseology related to reporting the vertical position of the aircraft.</p>
comment	<p>264 comment by: <i>European Transport Workers Federation - ETF</i></p> <p>Section 1.4.13</p> <p>Use of an alternative word for join in AFIS context is needed as reference to runway without introduction is misleading !</p>
response	<p>Noted</p> <p>The phraseologies that support the entrance to an aerodrome traffic circuit at an AFIS aerodrome are provided in the newly introduced point (c) of Section 1.4.13. Such phraseologies are coherent with the FIS principles.</p>
comment	<p>265 comment by: <i>European Transport Workers Federation - ETF</i></p> <p>Section 6.1</p> <p>UNABLE TO REQUEST START-UP CLEARANCE TO ATC DUE SLOT EXPIRED, REQUEST A NEW SLOT; A specific phraseology should allow an AFISO to respond and should be added.</p> <p>UNABLE TO REQUEST START-UP CLEARANCE DUE SLOT (<i>time</i>). A specific phraseology should allow an AFISO to respond and should be added</p>
response	<p>Not accepted</p> <p>With regard to start-up clearances, AFIS units may only relay such clearances when received from the relevant ATC unit.</p> <p>Please see also the response to comment #47.</p>
comment	<p>266 comment by: <i>European Transport Workers Federation - ETF</i></p> <p>Flight information services (en-route and aerodrome) require further phraseology for suggestions of manoeuvres for example.</p>
response	<p>Noted</p> <p>The use of phraseologies such as ‘suggest’ represents de facto a form of advisory service which is not compatible with FIS. Local implementation of advisory-like service could be pursued when in accordance with the framework defined by the EU legislation.</p>

comment	<p data-bbox="367 199 430 235">267</p> <p data-bbox="1165 199 1394 235">comment by: MS</p> <p data-bbox="367 257 1394 324">Norway has (along with our neighbouring countries) a long tradition for providing AFIS and have over the last decades evolved the service to a high level of maturity.</p> <p data-bbox="367 358 1394 470">With advanced national legislation/requirements related to competence (with periodic evaluation), medical fitness, tools and infrastructure the provision of AFIS in Norway hold a high standard, as do the service in the other Nordic countries.</p> <p data-bbox="367 504 1394 571">The above mentioned national maturity has over time led to a need for a few national additions to the existing ICAO/EASA procedures/regulations, phraseology included.</p> <p data-bbox="367 604 1394 638">«RWY FREE» vs. NO REPORTED TRAFFIC»</p> <p data-bbox="367 649 1394 716">The phraseology «RWY FREE» is both used nationally and in several of the other Nordic states.</p> <p data-bbox="367 750 1394 817">There are some positive safety aspects and advantages with «RWY FREE» that might not be matched with «NO REPORTED TRAFFIC RUNWAY» (1.4.19 J)).</p> <p data-bbox="367 851 1394 1041">The use of the phraseology «RWY FREE» clearly indicates that the information is unique and will ensure that only one aircraft at a time has been given this information from the AFIS unit. This phrase will also highlight that the RWY is visually observed by the AFIS unit and that no other aircraft, vehicles or FODs are present on the RWY .</p> <p data-bbox="367 1075 1394 1142">«(reason when the RWY is occupied) RUNWAY AVAILABLE FOR LINE UP (or TAXI, or TOWING)»</p> <p data-bbox="367 1176 1394 1243">Another national phraseology in use is «(reason when the RWY is occupied) RUNWAY AVAILABLE FOR LINE UP (or TAXI, or TOWING)».</p> <p data-bbox="367 1276 1394 1433">The phraseology has the advantage that an aircraft may enter the RWY, without departing, May be used when there are inspection vehicles on the RWY, snow clearance in progress, or back-tracking of landed aircraft.</p> <p data-bbox="367 1467 1394 1601">We would prefer to continue using the above mentioned phraseologies and feel that they reflect the maturity level of the AFIS provided in Norway. We suggest to add these phraseologies under <i>1.4.10 preparation for take-off</i> as an option for use in FIS provision.</p>
response	<p data-bbox="367 1624 462 1668">Noted</p> <p data-bbox="367 1680 1394 1870">It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service.</p> <p data-bbox="367 1881 1394 1993">EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning ‘information on the actual use on the runway’, which is included in Section 2.3 of NPA 2021-05.</p>

With regard to the comment on phraseologies provided in points (v) and (w) of Section 1.4.10, please see the response to comment #52.

comment 269 comment by: AESA/DSANA

Page 9

This NPA does not include some phraseologies from the Manual for Aerodrome Flight Information Service (Eurocontrol) that are in use in our State.

For example, AFIS officers are in charge of informing aircraft about the condition of aerodromes and associated facilities and any other information likely to affect safety, so there are some terms that should be included for them in "1.4.3. Starting procedures", "1.4.4. Pushback procedures", "1.4.7. Taxi procedures" or "1.4.10. Preparation for take-off". Additionally, AFIS officers may manage vehicles and people at the manoeuvring area according to ATS.TR.305 (f), so some phraseologies used by ATC are also applicable in those cases.

We propose to include them while keeping alignment with ICAO phraseologies for ATC.

response Noted
Please see the responses to comments #50, #71 and #279.

comment 270 comment by: AESA/DSANA

Page 10

Explanatory circumstances for letter v) are missing on the left column. It should read:

"... after the response to an ACAS RA is completed and the assigned ATC clearance or instruction has been resumed (Pilot and controller interchange)"

response Noted
The explanatory note provided, which states '... after the response to an ACAS RA is completed and a return to the ATC clearance or instruction is initiated (Pilot and controller interchange)', is applicable to points (t), (u), (v) and (w) of Section 1.1.2.

comment 271 comment by: AESA/DSANA

Page 14

In point "1.1.10 Additional reports", letters *c) and *f), the symbol "*" is missing in the table to indicate that those are used by pilots.

response Not accepted
Following verification, EASA confirms that the symbol '*' was included in the NPA text for Section 1.1.10 points (c) and (f).

comment 272 comment by: AESA/DSANA

Page 22



response	<p>There is a mistake in point "1.3.2. Approach instructions" letters *w) and x), where it reads "REQUEST/CLEARED S/RNAV plain-language designator);" it should read "REQUEST/CLEARED (RNAV plain-language designator);". The terms used in Doc. 4444 are "REQUEST/CLEARED (MLS/RNAV plain-language designator)".</p> <p>Accepted</p> <p>EASA thanks AESA/DSANA for spotting this inconsistency in the text of NPA 2021-05. ED Decision 2016/023/R includes the correct version of the phraseology, which is aligned with that in ICAO PANS-ATM.</p>
comment	<p>273 comment by: AESA/DSANA</p> <p>Page 24</p> <p>There is a mistake in point "1.4.3. Starting procedures" letter b), where it reads "aircraft location] REQUEST START-UP, INFORMATION IS (identification);" it should read "aircraft location] REQUEST START-UP, INFORMATION (ATIS identification);", according to Doc. 4444.</p>
response	<p>Accepted</p> <p>EASA thanks AESA/DSANA for spotting this inconsistency in the text of NPA 2021-05. ED Decision 2016/023/R includes the correct version of the phraseology, which is aligned with that in ICAO PANS-ATM.</p>
comment	<p>274 comment by: AESA/DSANA</p> <p>Page 25</p> <p>In point "1.4.7. Taxi procedures", letters a) and b) are phraseologies to be used by pilots, and the table should show "*" instead of ATC.</p>
response	<p>Noted</p> <p>The text in the table, as proposed in NPA 2021-05, is correct. Radiotelephony phrases in points (a) and (b) include the symbol '*' to indicate that it denotes pilot transmission, while on the right-hand side of the page there is the indication that these phrases are applicable in a context where ATC service is provided, as explained in GM1 Appendix 1 to AMC1 SERA.14001 'General'.</p>
comment	<p>275 comment by: AESA/DSANA</p> <p>Page 30</p> <p>We do not understand the difference between the phraseology NO REPORTED TRAFFIC RUNWAY (number) in point "1.4.14. In the circuit" and "1.4.19. Information to aircraft". Why the first one may be used for ATC and FIS services and the second one only for FIS?</p>
response	<p>Noted</p> <p>Please see the response to comment #52.</p> <p>The information concerning 'runway occupied or blocked' is applicable to ATC service as the information is relevant for aircraft affected by the use of the runway. Related ATC clearances or instructions would be issued, by the use of applicable phraseologies, according to the peculiar situation.</p>

comment	276	comment by: AESA/DSANA
	Page 36 In point "2.1.9. Communications and loss of communications", why letter b) is not assigned also to FIS, while letters a) and c) are also assigned to FIS?	
response	Noted The phraseologies in point (b) are to be used in circumstances where the pilot is required to maintain continuous watch on the frequency but not to acknowledge the received transmissions (e.g. provision of SRA). Such circumstances are not applicable in the FIS context.	
comment	277	comment by: FOCA Switzerland
	Page 24, point 1.4.3 Starting procedures: <ul style="list-style-type: none"> • Proposal: GM1 ATS.TR.305(b)(4)(a) should be reflected in the ATS phraseologies; • Rationale: GM1 ATS.TR.305(b)(4) states that start-up time procedures should be implemented where necessary to avoid congestion and excessive delay on the maneuvering area or when warranted by ATFM regulations. The phraseologies proposed for AFIS in Section 1.4.3 of the NPA do not provide phraseology to be used by the AFISO for the purpose of avoiding congestions on the maneuvering area of the AFIS aerodrome. 	
response	Not accepted The mentioned GM elaborates on the local instructions for AFIS units to handle start-up of aircraft that are subject to ATFM measures. The responsibility for adherence to the ATFM measures remains with the pilot, and related clearances and instructions are issued by the relevant ATC units and relayed to aircraft by the AFIS units using the phraseologies in Section 1.2.10. Please see also the response to comment #47.	

3. Proposed amendments

p. 9

comment	7	comment by: H.U.TE.O / H.C.A.A.
	Attachment #1 After a thorough study of EASA document NPA 2021-05, we are of the opinion that its phraseology is insufficient and the entire 5th chapter (CHAPTER 5 - Phraseology and AFIS requirements for communications) of the EUROCONTROL AFIS Manual should be added, which attached to you. HUTEO/HCAA	
response	Noted Regulation (EU) 2020/469 includes a detailed set of provisions concerning the provision of AFIS, which are fully aligned with the FIS principles and tailored to the specific scenario of the aerodrome context. A fundamental driver for the subsequent	



establishment of phraseologies for the provision of FIS/AFIS, introduced with ED Decision 2021/014/R, is the coherence of such phraseologies with the aforementioned principles. For your information, EASA has duly considered the content of the EUROCONTROL AFIS Manual in the proposal issued with NPA 2021-05.

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service.

comment

140

comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

1.1.2 Level changes, reports and rates ... z) aa)

With reference to EASA's previous messages regarding the use of phraseology for SID and STAR, Sweden wonder if the safety concerns around the phraseology for use of SID and STAR has been solved? Could this be described in text in overview of proposals? We also wonder if the phraseology, now different to the phraseology in ICAO doc 4444 (12.3.1.2 aa.- kk.), will consequently lead to an update of doc 4444?

1.1.6 Change of call sign

This methodology/phraseology is something that Sweden has implemented today (via national regulations) for both ATC and AFIS, and we agree to the proposed rule and it's wording.

1.1.15 RNAV

Sweden has made a reflection on the limitation to ATC in this phraseology. Shouldn't this rule be applicable also for AFIS/FIS for units were AFIS/FIS is provided with support of surveillance? (for the record: Sweden does not currently have any AFIS-P that provides AFIS with support of surveillance).

Proposal:

Apply the phraseology also for AFIS/FIS use.

1.4.3 Starting procedures

Sweden would like a clarification, what EASA means with points d) and f) how should these two phrases be used by AFIS (in which situations/circumstances)?

1.4.6 d) To request time check and/or aerodrome data for departure ...when no ATIS broadcast is available

There is missing an `or` between QNH and QFE.

Proposal on updated text:

d) RUNWAY (number), WIND (direction and speed) (units) QNH (or QFE).....

1.4.10 Preparation for take-off ...information on the runway status

According to the proposal in NPA 2021-05 (A)FIS Shall use the phrase v) *NO REPORTED TRAFFIC RUNWAY (number)*



Sweden's opinion is that there is a risk of this phrase might be confused with the phrase in 1.1.7 Traffic information b) NO REPORTED TRAFFIC in situations when there is more than one movement in airspace where FIS/AFIS is provided.

Proposal:

Change the phrase in 1.4.10 Preparation for take-off ...information on the runway status mom. v) to `RUNWAY FREE`.

This change will reduce the risk of misunderstandings and any consequential safety risks.

In the Swedish national legislation we have establish criteria's that have to be fulfilled when the phrase `Runway free` should be used by the AFISO. Another aspect is that there is no establish criteria's in this NPA/(EU) 2020/469 that have to be fulfilled when the phrase *NO REPORTED TRAFFIC RUNWAY (number)* should be used by AFIS.

1.4.14 In the circuit

According to the proposal in NPA 2021-05 (A) FIS Shall use the phrase c) *NO REPORTED TRAFFIC RUNWAY (number)*

Sweden's opinion is that there is a risk that this phrase might be confused with the phrase in 1.1.7 Traffic information b) NO REPORTED TRAFFIC in situations when there is more than one movement in airspace where FIS/AFIS is provided.

Proposal:

Change the phrase in 1.4.14 In the circuit mom. c) to `Runway free`.

This change will reduce the risk of misunderstandings and any consequential risks. In the Swedish national law we have establish criteria's that have to be fulfilled when the phrase `RUNWAY FREE` should be used by the AFISO.

Another aspect is that there is no establish criteria's in this NPA/(EU) 2020/469 that have to be fulfilled when the phrase *NO REPORTED TRAFFIC RUNWAY (number)* should be used by AFIS.

1.4.19 Information to aircraft ...other traffic

According to the proposal in NPA 2021-05 (A) FIS Shall use the phrase j) *NO REPORTED TRAFFIC RUNWAY (number)*

Sweden's opinion is that there is a risk that this phrase might be confused with the phrase in 1.1.7 Traffic information b) NO REPORTED TRAFFIC in situations when there is more than one movement in airspace where FIS/AFIS is provided.

Proposal:

Change the phrase in 1.4.19 Information to aircraft ...other traffic mom. j) to `RUNWAY FREE`.

This change will reduce the risk of misunderstandings and any consequential risks. In the Swedish national law we have establish criteria's that have to be fulfilled when the phrase `Runway free` should be used by the AFISO.

Another aspect is that there is no establish criteria's in this NPA/(EU) 2020/469 that have to be fulfilled when the phrase *NO REPORTED TRAFFIC RUNWAY (number)* should be used by AFIS.



response

With regard to the comment on Section 1.1.2: Noted
 The issue will be addressed via a regulatory proposal developed under RMT.0476, which should be launched for public consultation by the end of the year 2021.

With regard to the comment on Section 1.1.6: Noted
 Please see the response to comment #203.

With regard to the comment on Section 1.1.15: Noted
 Please see the response to comment #144.

With regard to the comment on Section 1.4.3: Noted
 Please see the response to comment #47.

With regard to the comment on Section 1.4.6 paragraph (d): Accepted
 Please see the response to comment #70.

With regard to the comments on Sections 1.4.10, 1.4.14 and 1.4.19: Not accepted
 Please see the response to comment #52.

comment 200 comment by: IAOPA

Attachment [#2](#)

Page Item	Text	Comment
7	This was considered particularly for the case of runway operations — one of the most safety-critical segments of aerodrome activities. The envisaged options included 'direct' information phrases like 'RUNWAY XX AVAILABLE FOR TAKE-OFF' and 'WARNING' phrases to be used for safety reasons like, for example, 'RUNWAY OCCUPIED' or 'AIRCRAFT IN SHORT FINAL'.	Even in examples or introductory text, the word Take-Off should not be used unless it has a direct link to the runway operation itself. Advice is to change it to ' RUNWAY XX AVAILABLE FOR DEPARTURE '. 'AIRCRAFT IN SHORT FINAL' should be ' AIRCRAFT ON SHORT FINAL '
9 1.1.2	Level changes, reports and rates	IAOPA proposes to add phraseology for FIS/AFIS RT only, to indicate a pilot is approaching airspace for which a clearance to enter is required;



		<p>ADVISE TO CLIMB (or DESCEND) followed as necessary by: 1) TO (level or altitude) 2) (classification) AIRSPACE AHEAD</p> <p>FIS/AFIS may also advise an aircraft to turn as to indicate a pilot is approaching airspace for which a clearance to enter is required;</p> <p>ADVISE TO TURN LEFT (or RIGHT) followed as necessary by: 1) TO (advised heading or direction) 2) (classification) AIRSPACE AHEAD</p>
11 1.1.3	'MINIMUM ENERGY' instead of 'MINIMUM FUEL'	In electrically powered aircraft, the fuel is electrical power. Whether the aircraft is conventionally powered or electrically powered, the power source has no relevance to the pilot's call that he is low on his source of power. Consequences for ATC do not significantly differ whether or not the aircraft is electrically powered or not. For clarity and simplicity the call should remain " LOW ON FUEL ", independent of the energy source. IAOPA agrees with the proponents of "Low on fuel" for harmonisation and simplicity purposes.
12 1.1.6	CHANGE YOUR CALL SIGN TO	<p>Advise is to add lines with the pilot transmissions</p> <p>Apart from the instructions 'CHANGE YOUR CALL SIGN TO' and 'REVERT TO FLIGHT PLAN CALL SIGN' the advise is to add 'USE FULL CALL SIGN' as an instruction to the pilot to refrain from using an abbreviated call sign in order to avoid confusion.</p> <p>IAOPA takes the position that in FIS/AFIS the instruction to change the callsign may be safely applied to avoid confusion with other aircraft.</p>
12 1.1.7	Traffic Information ..to acknowledge traffic information	Many aircraft are equipped with Electronic Conspicuity and/or ADS-B traffic warning systems. A pilot may transmit " Traffic on TCAS (or other term for a non-TCAS approved device) but not in sight (or "not visual") "
20 1.2.10	Relaying clearances, instructions, and information	(ATC unit) CLEARS (or INSTRUCTS) (or INFORMS) (Call sign of aircraft to which it is relayed) (details of the clearance, instructions, or information)
26 1.4.7	Taxi Instructions .. general	The possibility must be created for an FIS/AFIS to inform a pilot about the conditions of a taxiway and/or along the pilots route of taxiing;

		<p>s) (ADVISE TO) TAXI WITH CAUTION (<i>description of condition</i>)</p> <p>For example:</p> <ol style="list-style-type: none"> 1. "Taxi with caution, slippery spots on taxiway Bravo"; 2. "Advise to taxi with caution, work in progress along taxiway Charlie"
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response

With regard to the comment on p. 7: Noted
Please see the responses to comments #52 and #201.

With regard to the comment on Section 1.1.2: Noted
Please see the responses to comments #71 and #223.

With regard to the comment on Section 1.1.3: Noted
Please see the response to comment #1.

With regard to the comment on Section 1.1.6: Noted
Please see the response to comment #203.

With regard to the comment on Section 1.1.7: Noted
The purpose of the comment is not clear. The development of electronic conspicuity and/or ADS-B traffic warning systems is not considered sufficiently mature to establish, in the context of SERA, specified and harmonised procedures and related phraseologies. EASA will monitor the evolution of these systems and consider further actions in the future, in the context of activities related to the actions established by the Best Intervention Strategy on Airborne Collision Risks established in the [EPAS for 2021-2025](#).

With regard to the comment on Section 1.2.10: Not accepted
Any radiotelephony communication begins with the call sign of the identifier of the aircraft to which it is addressed, followed by the call sign of the transmitting ATS unit. The proposal would introduce unnecessary repetition.

With regard to the comment on Section 1.4.7: Not accepted
FIS includes the provision of information regarding the conditions of the movement area, including taxiways and aprons. Considering the extent of the types of information at stake, EASA considers the introduction of detailed phraseologies for each of the identifiable cases disproportionate, also considering point SERA.14001.

comment

202		comment by: IAOPA
9 1.1.2	Level changes, reports and rates	IAOPA proposes to add phraseology for FIS/AFIS RT only, to indicate a pilot is approaching airspace for which a clearance to enter is required;



		<p>ADVISE TO CLIMB (or DESCEND) <i>followed as necessary by:</i> 1) TO (level or altitude) 2) (classification) AIRSPACE AHEAD</p> <p>FIS/AFIS may also advise an aircraft to turn as to indicate a pilot is approaching airspace for which a clearance to enter is required;</p> <p>ADVISE TO TURN LEFT (or RIGHT) <i>followed as necessary by:</i> 1) TO (advised heading or direction) 2) (classification) AIRSPACE AHEAD</p>
response	Not accepted	Please see the responses to comments #71 and #200.

comment	206	comment by: <i>Morten Nielsen</i>
<p>1.1.9 Position reporting: It is exactly as relevant for AFIS/FIS as for ATC to request position reports or omit position reports.</p> <p>1.4.10 Preparation for take-off AFIS should be allowed to use "report ready for take-off". The phrase is a natural part of updating the traffic flow on RWY and i the traffic circuit.</p> <p>1.4.10 Preparation for take-off and 1.4.14 In the circuit The phrase "no reported traffic runway xx" Why reported? AFIS has a clear view of the maneuvering area including the runway. The word "reported" will only make the pilot uncertain whether there's traffic on runway or not. It is the AFIS-operators responsibility to report whether there's traffic on runway or not. The phrase should be: "no traffic runway xx"</p> <p>When is a runway occupied or blocked? When traffic is on runway or also when traffic is close? E. g. traffic on short final.</p> <p>1.4.12 Turn or climb instructions after take-off. AFIS should be given the possibility to "Approve right turn after departure" if traffic in the circuit permits. It will give at better traffic flow and take e.g., environmental restrictions or mountainous terrain into consideration. The phrase is part of the Danish rules and regulations today.</p> <p>2.1.7 Position reporting Same as in 1.1.9 In this case AFIS is equipped with surveillance equipment.</p> <p>2.1.8 Traffic information and avoiding action</p>		

response

AFIS should be given the possibility to issue avoiding action. It's a matter of life or death when a midst air collision is imminent. Danish AFIS-opr are educated in issuing avoiding action this should be a requirement everywhere.

With regard to the comment on Section 1.1.9: Noted

Please see the response to comment #144.

With regard to the comment on Section 1.4.10 (Preparation for take-off): Not accepted

The recommended phraseologies and scenarios envisaged are suitable only for the control of the traffic on the manoeuvring area.

With regard to the comment on Section 1.4.10 (Preparation for take-off) and 1.4.14 (In the circuit): Not accepted

It is expected that Member States designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service. Please see also the response to comment #52.

EASA confirms the validity of the rationale and the approach for introducing phraseologies concerning 'information on the actual use on the runway', which is included in Section 2.3 of NPA 2021-05.

With regard to the comment on Section 1.4.12: Not accepted

Please see the response to comment #52. It is emphasised that AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but AFIS units are not allowed to issue clearances and instructions.

With regard to the comment on Section 2.1.7: Not accepted

Please see the responses to comments #37 and #144.

With regard to the comment on Section 2.1.8: Noted

Please see the response to comment #236.

comment

211

comment by: FFA EUR

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1.1.3 : it seems better to keep using "Minimum Fuel", regardless of the source of power (it could be coal, fuel, hydrogen, electricity, ...). The introduction of the word "energy" does not seem to bring more information, and may add to confusion. If this wording "Fuel" needs to be changed, then the wording "Minimum **Endurance**" is closer to the nature of the concern expressed by the pilot, and sould be preferred.

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1.1.6 : agreed, it seems important to keep this proposal as it is here.

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	<p>1.1.9 (a) FIS should also be allowed to use this wording, for instance when traffic exits an RMZ</p> <p>Page 20 and 21 / 48</p> <p>1.3.1 : For the same reasons as per 1.2.1, AFIS should be permitted to use the phraseology to give departure informations, as already available in flight documentation</p> <p>Page 24/48</p> <p>1.4.4 : <u>title</u> should be "Aircraft / ATS", and not "Aircraft / ATC"</p> <p>Page 35/48</p> <p>2.1.7 : Position reporting : same as 1.1.9 (a) : FIS should be able to use "Next Report" , for instance when traffic is leaving RMZ/TMZ</p>
response	<p>With regard to the comment on Section 1.1.3: Noted Please see the response to comment #1.</p> <p>With regard to the comment on Section 1.1.6: Noted Please see the response to comment #203.</p> <p>With regard to comment on Section 1.1.9: Noted Please see the response to comment #144.</p> <p>With regard to the comment on Section 1.3.1: Not accepted Please see the response to comment #246.</p> <p>With regard to the comment on Section 1.4.4: Noted Please see the response to comment #48.</p> <p>With regard to the comment on Section 2.1.7: Not accepted Please see the response to comments #37 and #144.</p>

3.1. Draft acceptable means of compliance and guidance material (draft EASA decision)

p. 9

comment

11

comment by: *skyguide Compliance Management*

Comments:

We see no benefit in adding "MINIMUM ENERGY" to the phraseologies. In the interests of simplicity, the existing "MINIMUM FUEL" and plain language remarks if necessary, is preferable. (The term "fuel", although implying burning in its dictionary definition, is already used for power sources where physical processes other than burning take place, e.g. nuclear fuel).



response	<p>The phrase "minimum fuel" has a specific definition and prescribed procedures (ref. SERA Art. 2, SERA.11012 and GM1 SERA.11012). These would need to be reviewed if modifying the related phraseology.</p> <p>The proposed extension of the safety-related "call sign change" procedure to FIS/AFIS would seem beneficial.</p> <p>The addition of the check-boxes to AMC1 SERA.14001 is of questionable value. It is already the case that all phraseologies are only ever to be used as per the role, responsibility and qualifications of the ATS personnel concerned and the specific situation.</p> <p>English errors: § 1.4.3 d) and f) - "ADVICES" should be "ADVISES" § 5.1.2 k) – "STANDBY" should remain "STAND BY" (the verb form)</p>
	<p>Noted</p> <p>Please see the response to comments #1 and #47.</p>
comment	<p>14 comment by: IFATCA</p> <p>1.1.1. To avoid possible confusion of "to" with the digit 2, IFATCA proposes to make the use of HEIGHT and ALTITUDE mandatory.</p>
response	<p>Not accepted</p> <p>The optional use of the words 'HEIGHT' and 'ALTITUDE' was introduced to address situations where confusion might arise with regard to the values of the limit of the clearance. Nowadays, such optional phraseologies may be used already.</p> <p>On the subject of the comment, EASA is aware of a proposal for amendment being processed in the context of ICAO concerning these phraseologies in PANS-ATM.</p> <p>In consideration of the need for global harmonisation on this safety-critical subject, EASA intends to wait for the issuance of a formal ICAO proposal for amendment before introducing any further changes to the relevant SERA phraseologies.</p>
comment	<p>15 comment by: IFATCA</p> <p>1.1.2. Request clarification of a) 3): Is there a difference between AT or BY? Would BY indicate that a level must be reached at or before the position and AT would be at only? Or is BY used in context of time? If so, we would request a GM, please.</p>
response	<p>Noted</p> <p>Point (a)(3) is transposed unchanged from ICAO PANS-ATM and has been applicable since a long time. Section 12.2.9 of ICAO PANS-ATM describes the drafting convention for phraseologies and their use. Accordingly, text in parentheses (in this case the use of 'BY') indicates that specific information, such as level, place or time, etc., must be inserted to complete the phrase, or alternatively that such optional phrases may be used. It is not considered necessary to provide any GM for its application.</p>

comment	16	comment by: IFATCA
	1.1.3. Since there is no difference in handling we would prefer to use the word fuel synonymously for any kind of energy storage, be it fossil fuel, batteries or other. If needed, introduce GM.	
response	Noted Please see the response to comment #1.	
comment	17	comment by: IFATCA
	1.1.6. IFATCA agrees, if the AMCs and other provisions regulating new callsigns apply to FIS/AFIS. Please confirm.	
response	Noted Please see the response to comment #203.	
comment	18	comment by: IFATCA
	1.1.8. Suggested additional phrase: "WEATHER RADAR SHOWS HEAVY PRECIPITATION AREA (figures) O'CLOCK (distance) MILES AREA (figures) MILES DEEP EXTENDING FROM (direction) TO (direction) FOR (figures) MILES" for use by any ATS.	
response	Not accepted Information about weather that is derived from meteorological radars is not displayed to ATCO/FISO/AFISO in a standardised manner; therefore, it is considered premature to introduce a set of dedicated specific phraseologies. EASA will monitor the technological developments and will consider such aspects in the future.	
comment	19	comment by: IFATCA
	1.1.10a) Should not only be in reference to a significant point (see GM1 Article 2(121) Significant point), but also known local references, i.e. villages or land markings for AFIS and possibly FIS.	
response	Noted The definition of 'significant point' is provided in both Regulation (EU) No 923/2012 'SERA' (definition number 121) and Regulation (EU) 2020/469 (definition number 232), as follows: 'significant point' means a specified geographical location used in defining an ATS route or the flight path of an aircraft and for other navigation and air traffic services purposes; GM1 232 'Significant point' further clarifies: 'There are three categories of significant points: ground-based navigation aid, intersection and waypoint. In the context of this definition, intersection is a significant point expressed as radials, bearings and/or distances from ground-based navigation aids.' The existing phraseologies reflect such a definition. Further amendments to the phraseologies will be considered according to the evolution of those definitions in both the ICAO and the EU regulatory framework.	

comment	20	comment by: IFATCA
	1.2.10. IFATCA explicitly agree that specific phrases for relaying are beneficial. We propose to amend as follows: “(verbatim details of the clearance, instructions, or information)”	
response	Not accepted The current formulation of phraseologies in Section 1.2.10 is coherent with other phraseologies as well as with the ATS objectives and the functions of ATC service and FIS.	
comment	21	comment by: IFATCA
	1.4.10 Agree with the intention of proposed new phrases. p) should be made available to AFIS. Suggest to add AFIS-phrase: “RUNWAY (number) OCCUPIED, SUGGEST TO STOP IMMEDIATELY” for urgent cases. The proposed warning phrase could be not alerting enough in some cases.	
response	Not accepted Concerning the comment on point (p) in Section 1.4.10: Not accepted Please see the response to comment #72. Concerning the comment on the phrase to be added: Not accepted Please see the response to comment #231.	
comment	22	comment by: IFATCA
	1.4.12. Suggest to introduce 1.4.12.1 with AFIS/FIS-phrase “SUGGEST RIGHT (or LEFT) TURN [BY (degrees)] DUE TO (reason)” and “SUGGEST TO FLY HEADING (digits) DUE TO (reason)”	
response	Not accepted Please see the responses to comments #71 and #104.	
comment	23	comment by: IFATCA
	1.4.17 Request GM to illustrate the requested aircraft manoeuvre by the specific phrases, especially a). Is it to circle over the aerodrome or around?	
response	Not accepted Phraseologies are not established to describe how certain manoeuvres should be performed by aircraft, but to standardise and harmonise air-ground voice communications. Descriptions of manoeuvres in the vicinity of aerodromes are described in GM5 ATS.TR.210(a)(3) ‘Operation of air traffic control service — DESIGNATED POSITIONS OF AIRCRAFT IN THE AERODROME TRAFFIC AND TAXI	

CIRCUIT IN RELATION TO AERODROME CONTROL TOWER CLEARANCES', included in the annex *AMC & GM to Part-ATS — Issue 1, amendment 2* to [ED Decision 2020/008/R](#).

comment	24	comment by: <i>IFATCA</i>
	1.4.18 Suggest to introduce 1.4.18 with AFIS-phrase: "RUNWAY (number) OCCUPIED, SUGGEST TO GO AROUND" for use in urgent cases. The proposed warning phrase might be not alarming enough in some cases.	
response	Not accepted Please see the responses to comments #71 and #104.	
comment	25	comment by: <i>IFATCA</i>
	1.4.3. Explicitly agree with intention. The Correct verb would be "ADVISES". Anyway, IFATCA prefers "ATC CLEARS..."	
response	Noted Please see the response to comment #47.	
comment	26	comment by: <i>IFATCA</i>
	2.1.1. The phrases a) and c) might be applicable to AFIS/FIS. Please deliberate internally or in a focussed consultation.	
response	Accepted Please see the response to comment #251.	
comment	27	comment by: <i>IFATCA</i>
	2.1.6. Suggest to add phrases: "ON CONVERSION FLY SPEED (knots)" and "ON CONVERSION FLY MACH (number)" to provide tools for modern speed control to flights with cost index.	
response	Noted EASA will further assess the notion of speed control indicated in the context and consider it for future amendments, possibly based on the evolution of the ICAO PANS-ATM phraseologies.	
comment	28	comment by: <i>IFATCA</i>
	2.1.6. Suggest to switch the km/h and knots, since knots is the de facto standard in member states.	
response	Noted The current text of Section 2.1.6 allows for a free choice on the use of either kilometres per hour (km/h) or knots (kt).	
comment	29	comment by: <i>IFATCA</i>

	2.2.5 Request phrases for SRA, e.g. 2.2.5.3 and 2.2.5.8 a).
response	Not accepted Section 2.2.5 has been completely removed as PAR procedures are not addressed in the EU regulatory framework (Part-ATS of Regulation (EU) 2017/373, as amended by Regulation (EU) 2020/469). Phraseologies for SRA are contained in Section 2.2.4.
comment	30 comment by: IFATCA General FIS 2.3. IFATCA suggests to introduce phraseology "SQUAWK VFR" for all ATS.
response	Not accepted Section 2.3.3 provides for the phraseology to request any squawk, including A7000.
comment	31 comment by: IFATCA IFATCA suggests additional phrases: "MAINTAIN VMC", "OBSERVE MINIMUM SAFE HEIGHT" and "NAVIGATIONAL ASSISTANCE TERMINATED" for FIS.
response	Noted The comment does not specify the context for which the proposed phraseologies are proposed and the related justification. In general, it is reminded that the provided SERA phraseologies constitute a standardised common core content of identified phrases for common situations. Nothing prevents the ATCO/FISO/AFISO from using plain language to address specific situations not covered by the existing phraseologies, provided that this is done in accordance with the applicable principles and rules for the service provided.
comment	33 comment by: IFATCA 1.1.2. r), w), y) some FISO member of IFATCA report "ROGER" applies to them as well.
response	Noted Please see the response to comment #223.
comment	35 comment by: ENAV Most phraseologies contained are not intended to be exhaustive, and when circumstances differ, pilots, ATS personnel and other ground personnel will be expected to use plain language, which should be as clear and concise as possible, in order to avoid possible confusion by those persons using a language other than one of their national languages. The phraseologies are grouped according to types of air traffic service for convenience of reference. However, users shall be familiar with, and use as necessary, phraseologies from groups other than those referring specifically to the type of air traffic service being provided the same applies for the "circumstances" associated with the phrases. This important passage of the PANS-ATM is not included in SERA and it should be since it is of a primary operational significance. In fact, with such appropriate

	<p>explanation there would be no need to define new type of unknown services as it is proposed in this NPA (see for example para. 1.2 and 1.3). A GM could be useful. Furthermore, with reference to AFIS, standard phraseology could be used to relay an ATC clearance to an aircraft (e.g. level changes, reports and rates PARA 1.1.2 and PARA 1.2.4) so it should be appropriate to clear the fact that certain expression could be used in the context as appropriate.</p>
response	<p>Partially accepted</p> <p>In general, Member States shall designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service. FIS/AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but FIS/AFIS units are not allowed to issue clearances and instructions.</p> <p>GM1 Appendix 1 to AMC1 SERA.14001 ‘General’ has been amended to reflect the mentioned ICAO PANS-ATM principle.</p>
comment	<p>97 comment by: <i>AB Dalaflyget</i></p> <p>Section 1.1.9 The opportunity for AFIS to use position reporting exists today and improves the quality of flight information. The proposal is that AFIS should also be made possible to use the phraseology in subsection 1.1.9</p>
response	<p>Not accepted Please see the response to comment #144.</p>
comment	<p>238 comment by: <i>DFS Aviation Services</i></p> <p>1.1.2 Level changes Level change phraseology should be marked as also „Applicable to FIS“, since AFIS Units usually are responsible for clearance delivery to IFR departures. Enroute clearances for IFR flights departing from airports where an AFIS Unit has been established are issued by the parent ACC or competent APP Unit and delivered by the local AFISO. Enroute clearances or departure (climb) releases usually include initial climb instructions. Therefore level change phraseology should generally be marked as also “Applicable to FIS” -- under exception of phraseology aa) („Descend to“), as AFIS Units do not deliver or relay any approach clearances.</p> <p>1.1.5 8,33 kHz Frequency spacing Phraseology for information about the justification of a certain clearance for frequency spacing reasons [j) „DUE EIGHT POINT THREE THREE REQUIREMENT“] should be marked as also „Applicable to FIS“, since AFIS Units are responsible for clearance coordination and delivery (relay) for IFR departures and can be (or are sometimes) requested to pass this information to flight crew. (Enroute clearances for</p>

IFR flights departing from airports where an AFIS Unit has been established are issued by the parent ACC or competent APP Unit and delivered by the local AFISO.)

1.1.9 Position reporting

AFIS Units may anytime instruct aircraft to provide position reports in order to aid situational awareness. Additionally, compulsory and/or non-compulsory reporting points have in many cases been established along, inside or around the boundaries of the Area of Responsibility of AFIS Units (usually a FIZ, ATZ or RMZ). Especially in the case of AFIS Units not equipped with ATS surveillance systems, position reporting is a crucial tool for the provision of accurate traffic information. Therefore all position reporting instructions should be marked as also „Applicable to FIS“.

1.1.15 RNAV

At regional airports local ATS (i.e. ATC or AFIS) Units are responsible for clearance delivery (relay) to IFR departures and, if necessary, also provide coordination of requests or preferences of flight crews regarding their Enroute clearance to be issued with the issuing unit (Enroute clearances for IFR flights departing from airports where an AFIS Unit has been established are issued by the parent ACC or competent APP unit and delivered by local AFISOs). Therefore phraseology for information about clearance issuance limitations due to missing RNAV compliance should be marked as also „Applicable to FIS“.

1.2.1 Clearance issuance

1.2.2 Route and Clearance limit

1.2.3 Maintenance of Levels

1.2.4 Cruising Levels

1.2.6 Clearance issuance time

1.2.10 Relaying clearances, instructions and information

As with regional airports where Aerodrome control service is provided, Enroute clearances for IFR flights departing from airports where an AFIS Unit has been established are issued by the parent ACC or competent APP Unit and only delivered (relayed) by the aerodrome ATS personnel. As far as necessary, local aerodrome ATS units –thus AFIS units too— also provide coordination of requests or preferences of flight crews regarding their Enroute clearance with the issuing ATS Unit. Hence there is no reason for a distinction between Clearance delivery phraseology for Aerodrome control service units and Clearance delivery phraseology for Aerodrome information service units, since Enroute clearances are in both cases (i.e. Aerodrome control service and Aerodrome information service), strictly speaking, only relayed. Moreover, enroute clearance delivery phraseology always follows the same principles and structure, regardless the type of ATS provided at a specific aerodrome. (Some advocates of this artificial distinction may argue that this distinction could prevent pilots from complying with an illegitimate clearance illicitly issued by an AFISO unauthorized to do so – though apart from the fact that there is no obvious reason to assume that AFISOs tend to devise and transmit such false clearances, one must not forget that also local Tower ATCOs theoretically could do so without being authorized to, since they also are only authorized to relay enroute clearances issued by the relevant approach control unit or the parent ACC.) Therefore phraseology listed in the aforementioned Sections (1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.2.6) should be marked as also “Applicable to FIS”. In turn, Section 1.2.10 should be dropped, because phraseology for relayed clearances is already included in Section 1.2.1 and no duplication is needed.



1.4.3 Starting procedures

Due to local procedures and/or national legislation AFIS Units are in many cases authorized to issue (or deny) start-up approval and/or monitor adherence to EOBT or CTOT and so to issue start-up instructions (and/or times). Therefore start-up phraseology should entirely be marked as also “Applicable to FIS”.

1.4.4 Pushback procedures

1.4.5 Towing procedures

1.4.7 Taxi procedures

Due to local procedures and/or national legislation AFIS Units are in many cases authorized to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus also to issue taxi, pushback, backtrack and towing instructions or approvals (similarly to ground movement control). Therefore pushback, towing, taxi and backtrack phraseology must be entirely marked as also “Applicable to FIS”.

1.4.8 Holding

AFIS Units are for safety purposes mostly obliged or at least authorized to issue holding instructions to aircraft on the movement area. Thus holding phraseology should under no circumstances be excluded from being marked as also “Applicable to FIS”.

1.4.9 Runway crossing

Due to local procedures and/or national legislation AFIS Units are in many cases authorized to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus also to issue runway crossing instructions. Therefore crossing phraseology should without exception be marked as also “Applicable to FIS”.

1.4.10 Take-off preparation

- In this section phraseologies b), c), and d) are just requests by a local Aerodrome ATS Unit to report current status of take-off preparation. Apart from the fact that AFIS Units are anytime authorized to pass such requests, reports about the status of take-off preparation aid situational awareness and are highly essential for the provision of accurate traffic information as well as –first of all– for a timely and adequate coordination of departure releases (issued by the parent ACC or the competent approach control unit). Hence there is absolutely no justification for excluding those phraseologies from being marked as also “Applicable to FIS”.

- Since AFIS Units are normally responsible for the coordination and delivery (relay) of Enroute clearances (issued by the competent approach control unit or the parent ACC), they sometimes also have to handle (i.e. relay to and coordinate with the clearance issuing unit) pilot requests regarding preferred departure routing and/or type. Thus phraseologies a), s) and t) must not be excluded from being marked as also “Applicable to FIS”.

- Not only because due to local procedures and/or national legislation AFIS Units are in many cases authorized to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus to issue taxi instructions (similarly to ground movement control) and/or to select/determine runway in use (cf. also SERA.3225(d) in conjunction with SERA.9005(d)(2)), but also because IFR take-offs are commonly not permitted outside slot (CTOT) tolerance



and/or prior the issuance and reception of a departure release, coordinated with and issued by the competent approach control unit or parent ACC, phraseologies f), g), h), i), k), m), n), o), and q) must be marked as also “Applicable to FIS”.

- Finally, phraseology p) only constitutes an information issued by the local aerodrome ATS Unit to flight crew regarding the respective TORA. Hence there is absolutely no reason to exclude this information phraseology from being marked as also “Applicable to FIS”.

1.4.11 Take-off

- AFIS Units are mostly obliged or at least authorized to instruct aircraft to abort take-off in case of danger of collision (e.g. traffic on the runway). Thus phraseologies e) and g) should under no circumstances be excluded from being marked as also “Applicable to FIS”. In this context (safety) AFIS Units are often authorized to advise aircraft blocking the runway without reason (instead of departing as intended) to use the runway for take-off (to depart) or vacate it, so that other traffic is neither endangered nor impeded. Therefore also phraseologies c) and d) should be additionally “Applicable to FIS”, especially considering AFIS Units authorized by local procedures and/or national legislation to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus also to issue relevant instructions. Finally, this section should be renamed from “Take-off clearance” to “Take-off”, because not all phraseologies herein consist in clearances as well as in order to take account of their envisaged applicability to AFIS.

- Additionally and after detailed in-depth consideration we would like to emphasize, that as a major Aerodrome ATS provider (ATC, AFIS) and part of one of the leading ANSPs in Europe we strongly support and urgently request the official adoption of – still lacking– unambiguous, concise and stringent (i.e. compliant with ATS phraseology philosophy, logic and systematics) phraseologies to indicate the availability of a runway for safe and rule-consistent take-off or landing, i.e. mainly (1) the absence of other traffic on the runway, (2) the absence of other traffic on final approach to the runway, (3) the absence of other traffic departing from the runway, (4) the absence of other restrictions for the specific flight (e.g. ATFM measures, legal injunctions etc.) as well as (5) the presence/issuance of a departure release (for IFR departures). It should be clear, that such take-off and landing information phraseologies must be semantically able to cover every applicable combination of several (or all) of the abovementioned circumstances in a consistent manner, exactly like take-off or landing clearances do. However phraseologies for take-off and landing information should be clearly distinguishable from take-off and landing clearances by demonstrating or even accentuating their non-clearance character (i.e. expressing that responsibility for vertical and horizontal separation rests with the flight crew, whereas in the case of take-off or landing clearances responsibility for separation would rest with ATC), but in the same time be also compatible with ATS/ATC phraseology systematics, in order to be consistent and harmonized with other ATS phraseology as well as in order to fit for use by aerodrome ATS units with alternating ATC/AFIS operations. Obviously, recently promoted phraseologies for the indication of the runway availability for take-off or landing (e.g. “RUNWAY [number] FREE” or “NO REPORTED TRAFFIC RUNWAY [number]”) cannot meet these needs and are inflexible as well as unsuitable for several reasons (for instance “NO REPORTED TRAFFIC” states the absence of other traffic on the runway, but does not cover the absence of other restrictions and –for IFR departures– the presence of a departure release; besides, due to its semantics it cannot be used to indicate the availability of the runway for safe take-off or landing in case of any reported traffic, even if this



traffic would not at all affect the addressed traffic landing or taking-off on the runway at this time, e.g. traffic reported to join the circuit soon or reported joining downwind leg – just to give a few examples). Conversely, the relevant phraseologies safely still being used for many decades in many European and other countries by AFIS Units (Austria, Czechia, Portugal, Slovenia, Switzerland, United Kingdom etc.) meet all abovementioned criteria in the best possible manner and are well-established, properly understood and universally accepted: “TAKE-OFF AT OWN DISCRETION” and “LAND AT OWN DISCRETION”. They indicate in an unambiguous, concise and consistent manner the availability of safe and rule-consistent take-off or landing. Thanks to their flexibility they can be adapted/varied to provide precise information (“TOUCH-AND-GO AT OWN DISCRETION” for intended Touch-and-Go, “LOW APPROACH AT OWN DISCRETION” for intended Low Approach, “LIFT AT OWN DISCRETION” for helicopter operations out of the Apron etc.) and thanks to their compatibility with other ATS phraseology they can be adequately combined with other information, warnings, instructions etc. (e.g. “RIGHT TURN APPROVED, WIND [number] DEGREES [number] KNOTS, RUNWAY [number], TAKE-OFF AT OWN DISCRETION” in case of right turn approval, “NOT BELOW 500 FEET, LOW APPROACH AT OWN DISCRETION” in case of intended Low Approach during runway occupation etc.). Therefore we explicitly call for immediate general adoption of these phraseologies (“TAKE-OFF AT OWN DISCRETION”, “LAND AT OWN DISCRETION” etc.) for the issuance of take-off and landing information by AFIS Units.

1.4.16 Landing

See comments above (1.4.11): Adoption of Landing information phraseology for AFIS Units (LAND AT OWN DISCRETION, TOUCH-AND-GO AT OWN DISCRETION, LOW APPROACH AT OWN DISCRETION, LOW PASS AT OWN DISCRETION) and renaming of this section to “Landing” in order to include abovementioned non-clearances (Landing information).

1.4.12 After take-off

Due to local procedures and/or national legislation AFIS Units are often authorized to approve or refuse turns (and/or other manoeuvres) deviating from published VFR departure procedures. Thus phraseologies b), c) and f) must not be excluded from being marked as also “Applicable to FIS”.

1.4.18 Missed approach

AFIS Units are mostly obliged or at least authorized to instruct aircraft to go around in case of danger of collision (e.g. traffic on the runway). Thus phraseology a) should under no circumstances be excluded from being marked as also “Applicable to FIS”.

1.4.20 After landing

Due to local procedures and/or national legislation AFIS Units are in many cases authorized to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus to issue taxi instructions. Therefore phraseologies e), f), g) and h) should be marked as also “Applicable to FIS”. Furthermore, not only in cases, where due to local procedures and/or national legislation AFIS Units are authorized to grant or refuse permission for aircraft ground movement, including the allocation of taxi routings, and thus to issue taxi instructions, but also generally for safety reasons (e.g. in case of danger of collision) AFIS Units are often authorized to instruct aircraft to expedite runway vacation if



necessary. Thus phraseology c) should under no circumstances be excluded from being marked as also “Applicable to FIS”.

2.1.1 Identification of Aircraft

For identification purposes it can be very useful for AFIS Units using ATS surveillance systems to receive heading and altitude reports as well as radio transmissions (especially if also VHF direction finding equipment is available). Therefore phraseologies a) and c) should under no circumstances be excluded from being marked as also “Applicable to FIS”.

2.1.7 Position reporting

AFIS Units may anytime instruct an aircraft to provide position reports in order to aid situational awareness. Moreover, compulsory and/or non-compulsory reporting points have in many cases been established along, inside or around the boundaries of the Area of Responsibility of AFIS Units (usually a FIZ, ATZ or RMZ). Even in the case of AFIS Units using ATS surveillance systems, position reporting is a crucial tool for the provision of accurate traffic information and navigational assistance. Therefore all position reporting instructions in this section should be marked as „Applicable to FIS“.

6.1 ATFM

Due to local procedures and/or national legislation AFIS Units are in many cases authorized to approve or deny start-up and/or monitor adherence to ATFM measures and thus to issue start-up instructions (and/or times). Therefore all ATFM phraseologies (even for denial of start-up approval) should be marked as also “Applicable to FIS”. In this context the start-up denial phraseologies should be adapted (“start-up approval” or “permission” instead of “clearance”, which anyway appears to be the better choice even also for aerodrome ATC Units).

response

As a general remark, it is appropriate to emphasise that Member States are expected to designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service.

With regard to the comment on Section 1.1.2: Not accepted

Please see the response to comment #223.

With regard to the comment on Section 1.1.5: Noted

Most of the phraseologies in Section 1.1.5 are indicated as applicable to FIS. Point (j) relates to relaying ATC clearances with the embedded justification described in the column ‘Circumstances’.

With regard to the comment on Section 1.1.9: Not accepted

Please see the response to comments #37 and #144.

With regard to the comment on Section 1.1.15: Not accepted

Please see the response to comment #144. When clearances issued by ATC units for peculiar local scenarios are relayed to aircraft by AFIS units, the phraseologies established in Section 1.2.10 are to be used.

With regard to the comment on various phraseologies in Section 1.2: Not accepted



FIS/AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but FIS/AFIS units are not allowed to issue clearances and instructions. The phraseologies in Section 1.2.10 clearly include the notion that clearances are relayed from a specified ATC unit.

With regard to the comment on Section 1.4.3: Not accepted

Please see the response to comment #47.

With regard to the comment on Sections 1.4.4, 1.4.5 and 1.4.7: Not accepted

Please see the responses to comments #50 and #71.

With regard to the comment on Section 1.4.8: Not accepted

Please see the response to comment #51.

With regard to the comment on Section 1.4.9: Not accepted

Please see the response to comment #51.

With regard to the comment on Section 1.4.10: Not accepted

Please see the responses to comments #52 and #71.

With regard to the comment on Section 1.4.11: Not accepted

Please see the responses to comments #52 and #71.

With regard to the comment on Section 1.4.12: Not accepted

Please see the response to comment #52. It is emphasised that AFIS units are allowed to relay clearances and instructions issued by ATC units, and for this purpose the phraseologies in Section 1.2.10 have been introduced, but AFIS units are not allowed to issue clearances and instructions.

With regard to the comment on Section 1.4.16: Not accepted

The notion of 'at own discretion' appears misleading in the context of AFIS, where pilots are not expected to receive clearances or instructions by the AFIS unit, but shall conduct their flights on the basis of the information received by AFIS, by other pilots, by their visual observation, and by other potentially available sources.

With regard to the comment on Section 1.4.18: Not accepted

Please see the response to comment #56.

With regard to the comment on Section 1.4.20: Not accepted

Please see the response to comment #79.

With regard to the comment on Section 2.1.1: Accepted

Please see the response to comment # 251.

With regard to the comment on Section 2.1.7: Not accepted

Please see the responses to comments #37 and #144.

With regard to the comment on Section 6.1: Not accepted

Please see the response to comment #61.

comment

239

comment by: *President IFISA*

General: We truly appreciate the work being done in this area. On top of our following comments, we are missing examples for the following:

- Phraseology for ground/vehicle movements
- Phraseology for parajump activity, fuel dump, SAR broadcasts
- Phraseology for NOTAM broadcasts, SIGMET broadcasts, Urgent Pirep broadcasts

While AFIS/FIS certainly do not control aircraft, we often recommend with phraseology like "Can you..." or "Request...", for example: "Request Hold Short of runway XX due traffic", "Can you turn left base and follow traffic on final"

Also relaying of ATC clearances is already included in today's phraseology, and we do not see the need to make an additional section for FIS. However if this is deemed important to state by EASA this is not a problem, we just don't see the need for it

1.1.1 To avoid possible confusion of "to" with the digit 2, we would propose to make the use of HEIGHT and ALTITUDE mandatory

1.1.5 j) Should also be applicable by FIS, but as a suggestion or information. DUE EIGHT POINT THREE THREE REQUIREMENT WE (SUGGEST or INFORM)

1.1.9 Should be available to FIS, it is already implemented and being used in several states ie Denmark, Netherlands, Poland, Austria, Germany etc. Especially Enroute where mandatory reporting points are present as an example offshore traffic in the Northsea.

1.1.11 g) Says braking action reported by aircraft type. Should include "estimated surface friction" for surface friction by taylorimeter or friction tester

1.1.13 a) Should be applicable for FIS as this is just a question towards equipment status, and the status is often relayed to ATC.

1.2.10 Relaying of ATC clearances is already included in today's phraseology 1.2.1-1.2.2, and we do not see the need to make an additional section for FIS. However if this is deemed important to state by EASA this is not a problem, we just don't see the need for it

b) We suggest the term [READBACK CORRECT] to be included.

1.4.3 The start-up and pushback procedures often take place outside the maneuvering area on controlled aerodromes, and as such should also be available to AFIS on un-controlled aerodromes. Due to local procedures and/or national legislation AFIS units are in many cases authorized to control start-up and/or monitor adherence to start-up times and thus to issue start-up instructions (and/or times). This is already being used in several states.

1.4.4 The start-up and pushback procedures often take place outside the maneuvering area on controlled aerodromes, and as such should also be available to



AFIS on un-controlled aerodromes. Due to local procedures and/or national legislation AFIS units are in many cases authorized to control start-up and/or monitor adherence to start-up times and thus to issue start-up instructions (and/or times). This is already being used in several states.

1.4.5 Should be applicable to FIS but with the term SUGGEST/RECOMMEND, for example SUGGEST TO TOW VIA (specific routing to be followed), SUGGEST TO HOLD POSITION [reason]

1.4.6 b) TIME IS (time)

1.4.7 Should be applicable to FIS but with the term SUGGEST/RECOMMEND, for example SUGGEST TAXI TO HOLDING POINT (number), RECOMMEND TO HOLD SHORT OF RUNWAY (number) [reason]

1.4.10 b), c) and d) Should be available for FIS.

v) NO TRAFFIC ON THE RUNWAY

1.4.14 c) NO TRAFFIC ON THE RUNWAY

1.4.19 j) NO TRAFFIC ON THE RUNWAY

2.1.1 a) should be applicable to FIS

h) NO RADAR CONTACT

2.1.7 Should be available to FIS, it is already implemented and being used in several states ie Denmark, Netherlands, Poland, Austria, Germany etc. Especially Enroute where mandatory reporting points are present as an example offshore traffic in the Northsea.

2.1.10 d) LOST RADAR CONTACT

6.1 Due to local procedures and/or national legislation AFIS units are in many cases authorized to control start-up and/or monitor adherence to ATFM measures and thus to issue start-up instructions (and/or times). Therefore all ATFM phraseologies (even on denial of start-up approval) should be marked as also "Applicable to FIS". In this context the start-up denial phraseologies can be adapted ("start-up approval" or "permission" instead of "clearance", which would be the better choice.

response

As a general remark, it is appropriate to emphasise that Member States are expected to designate the appropriate ATS to support safe operations — in this case, in the context of aerodrome operations. When a Member State selects the provision of AFIS at a specific aerodrome, it is expected that the AFIS unit provide the service according to the principles and provisions established for that service.

With regard to the comment on the missing phraseologies to address ground/vehicle movements: Noted

Please see the response to comment #279.

With regard to the comment on the missing phraseologies to address parajump activity, fuel dump, SAR broadcasts, NOTAM broadcasts, SIGMET broadcasts, Urgent Pirep broadcasts: it is reminded that the provided SERA phraseologies constitute a



standardised common core content of identified phrases for common situations. Nothing prevents the ATCO/FISO/AFISO from using plain language to address specific situations not covered by the current phraseologies, provided that this is done in accordance with the applicable principles and rules for the service provided.

With regard to the comment on the phraseologies for relaying clearances: Not accepted

Current Appendix 1 AMC1 SERA.14001 does not include such explicit phraseologies to be used by FIC and AFIS units for relaying clearances issued by other ATC units. The current situation could lead to the interpretation by FIC or AFIS units that they are allowed to issue such clearances or instructions, or to the perception by the pilots that such units are allowed to issue clearances or instructions.

With regard to the comment on Section 1.1.1: Noted

Please see the response to comment #14.

With regard to the comment on Section 1.1.5 paragraph (j): Noted

Please see the response to comment #238.

With regard to the comment on Section 1.1.9: Not accepted

Please see the response to comment #144.

With regard to the comment on Section 1.1.11 paragraph (g): Not accepted

The phraseology at stake has been recently introduced as a result of the introduction of the Global Reporting Format concept introduced by ICAO, as it is based on a report from pilots that land before the aircraft to which the information is directed.

With regard to the comment on Section 1.1.13 paragraph (a): Noted

Please see the response to comment #237.

With regard to the comment on Section 1.4.3: Not accepted

Please see the response to comment #47.

With regard to the comment on Section 1.4.4: Not accepted

Please see the response to comment #50.

With regard to the comment on Section 1.4.5: Not accepted

Please see the response to comments #49 and #71.

With regard to the comment on Section 1.4.6: Not accepted

The current phraseology in Section 1.4.6 is fully aligned with that in ICAO PANS-ATM Section 12.3.4.6 and has been in force with its current text in SERA for years. The comment does not provide any justification for the proposed amendment.

With regard to the comment on Section 1.4.7: Not accepted

Please see the responses to comments #50 and #71.

With regard to the comment on Section 1.4.10 paragraphs (b), (c) and (d): Not accepted

Please see the response to comment #52.

With regard to the comment on Section 1.4.14 paragraph (c): Not accepted

Please see the response to comment #52.

With regard to the comment on Section 1.4.19 paragraph (j): Not accepted

Please see the response to comment #52.

With regard to the comment on Section 2.1.1 paragraph (a): Accepted

Please see the response to comment #251.

With regard to the comment on Section 2.1.1 paragraph (h): Not accepted

Current point (g) covers the subject scenario and is indicated as applicable to FIS.

With regard to the comment on Section 2.1.7: Not accepted

Please see the responses to comments #37 and #144.

With regard to the comment on Section 2.1.10 paragraph (d): Not accepted


Current point (c) covers the subject scenario and is indicated as applicable to FIS.


With regard to the comment on Section 6.1: Not accepted

Please see the response to comment #61.



3. Appendix — Attachments

 [EUROCONTROL AFIS Manual.pdf](#)
Attachment #1 to comment [#7](#)

 [NPA_2021-05.pdf](#)
Attachment #2 to comment [#200](#)

