



European Aviation Safety Agency

EXPLANATORY NOTE

AMC and GM to AUR - INITIAL ISSUE

Executive Director Decision 2012/002/R adopts Acceptable Means of Compliance and Guidance Material for common airspace usage requirements and operating procedures ('AMC and GM to AUR'), incorporating the output from the following EASA rulemaking task:

Rulemaking Task No.	TITLE	NPA No.
ATM.002	Introduction of ACAS II software version 7.1	2010-03

This NPA was subject to consultation in accordance with Article 52 of the Basic Regulation¹ and Article 5(3) and 6 of the rulemaking procedure established by the Management Board². The Agency has addressed and responded to the comments received on the NPA. The responses are contained in a comment-response document (CRD) which has been produced for the NPA and which is available on the Agency's website.

Detailed changes incorporated in the NPA are summarised in the following pages for ease of reference.

¹ Regulation (EC) No 216/2008 of 20 February 2008 on common rules in the field of civil aviation and establishing a European Aviation Safety Agency, and repealing Council Directive 91/670/EEC, Regulation (EC) No 1592/2002 and Directive 2004/36/EC (OJ L79, of 19.3.2008, p.1.) Regulation as last amended by Regulation 1108/2009 of the European Parliament and of the Council of 21 October 2009 (OJ L 309, 24.11.2009, p. 51).

² Management Board Decision concerning the procedure to be applied by the Agency for the issuing of opinions, certification specifications and guidance material ('Rulemaking Procedure'), EASA MB/08/07, 13.6.2007.

In response to CRD 2010-03, the Agency received a substantial reaction, which is reproduced below together with the Agency's response:

Commentator/Reference	Reaction	EASA Response
<p>Royal Aeronautical Society</p>	<p>AMC.AUR.ACAS.300 ACAS II Training</p> <p>1. The contents of the newly-proposed AMC.AUR.ACAS.300 appear to reflect a list of references first published nine years ago in text developed by the JAA Operations Committee/Sectorial Team as ACJ OPS 1.398 'Use of Airborne Collision Avoidance System (ACAS)', but their use in this AMC is inappropriate. When drafting that ACJ, the Committee felt that it would be helpful to identify all documents published on this topic by ICAO that had been absorbed within the first JAA Temporary Guidance Leaflet (TGL) No 11 published in October 1998 (superseded in October 2004). JAA TGL No 11 was for several years the preferred single-source reference intended for use by JAA Member States, their commercial air transport operators and flight crews.</p> <p>2. The text of ACJ OPS 1.398 published as Amendment 3 on 1 December 2001 read:</p> <p>'The ACAS operational procedures and training programmes established by the operator should take into account Temporary Guidance Leaflet 11 "Guidance for Operators on Training programmes for the Use of ACAS". <u>This TGL incorporates advice contained in:</u>' (our underlining). The ACJ then listed all the documents now repeated in the proposed new AMC. AUR.ACAS.300. To list these now as first references would be a step backwards,</p>	<p>Partially accepted</p> <p>The Agency accepts the comments with respect to Annex 10 and ICAO guidance material 'ACAS Performance-based Training Objectives' and that the reference should be more comprehensive.</p> <p>However, as the Implementing Rule already states those provisions that are identified in as Part III, Section 3, Chapter 3 of PANS-OPS it is not required to repeat these in the AMC. Therefore, only a reference to attachment A and B to Part III, Section 3, Chapter 3 is made with respect to the development of training programmes.</p> <p>As reference is only made to the PANS-OPS attachments there is no link to PANS-ATM from these sections, hence the PAN-ATM reference is still required. The reference to PANS-ATM has been complemented by reference to chapters 12 and 15.</p>

	<p>especially as a new, improved and far more comprehensive single-source reference than TGL 11 has now been published by ICAO PANS-OPS for global application.</p> <p>3. Specifically, the list of reference material proposed in the Resulting Text AMC.AUR.ACAS II is considered to be inappropriate for the following reasons:</p> <p>a. ICAO Annex 10, Volume IV: The contents of this Annex, that addresses the technical specifications for ACAS, do not need to be known by flight crew (who are specifically referenced in the 'parent' AUR.ACAS.300 ACAS II Training).</p> <p>b. ICAO PANS-OPS, Volume I: This reference needs to be expanded to ensure that there can be absolutely no doubt as to the full scope of what must be taught to the flight crew of aircraft equipped with ACAS II.</p> <p>c. ICAO PANS-ATM: This reference has value insofar as it contains the phraseology expected to be used between flight crews and air traffic control officers, but its retention in this AMC would cause unnecessary duplication as the same reference appears as a Note in the comprehensive guidance published in PANS-OPS, Volume I.</p> <p>d. ICAO guidance material 'ACAS Performance-based Training Objectives' (published under Attachment E of State Letter AN 7/1.3.7.2-97/77): This letter and all its contents became redundant when the current PANS-OPS, Volume I guidance material was published.</p>	
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4. In brief, all that the new AMC should contain is a comprehensive reference to PANS-OPS, Volume I and both of its associated Attachments so that there can be absolutely no doubt in the mind of recipients as to what references they should (must) use for operating procedures and training with regard to ACAS II.

5. It is imperative that all pilots seated at the controls of an aircraft equipped with ACAS II – whether or not carriage of ACAS is prescribed – should be trained to the common, global standard, which is why ICAO developed one and published it in PANS-OPS, Volume I, and underscored this with linked requirements in Annex 6 Parts I (international CAT) and II (international GA). A pilot who has not been so trained is quite liable to misuse the information and alerts displayed and annunciated by the equipment, and could as a result exacerbate or even cause a potential in-flight conflict between two or more aircraft. It has been opined that an untrained pilot presented with ACAS information could be more hazardous than if ACAS had not been installed! Proper training in the use of and response to ACAS-generated displays and alerts, and the avoidance of their being misused is essential.

Recommendation

There is a powerful argument for upgrading the Resulting Text AMC. AUR.ACAS.300 to IR status because there really are no acceptable alternative instructions. It is recommended that these instructions should be incorporated in

AUR.ACAS.300 as a second paragraph '(b)' (with the consequent deletion of the currently-related AMC), whilst re-labelling the existing first paragraph of AUR.ACAS.300 '(a)') thus:

AUR.ACAS.300 ACAS II Training

(a) ACAS II operational procedures and training programmes shall be established so that the flight crew is appropriately trained in the avoidance of collisions and competent in the use of ACAS II equipment.

(b) The ACAS II operational procedures and training programmes established by the operator shall take into account the guidance material contained in ICAO PANS-OPS, Volume I Flight Procedures, Part III, Section 3, Chapter 3, Operation of ACAS Equipment, including Attachment A (ACAS Training Guidelines for Pilots) and Attachment B (ACAS High Vertical Rate Encounters).

However, if the elevation to IR status is not considered acceptable to EASA, then AMC.AUR.ACAS.300 should be based solely upon the ICAO single-point reference and redrafted as follows:

AMC.AUR.ACAS.300 ACAS II Training

1. GENERAL

The ACAS II operational procedures and training programmes established by the operator should

	take into account the guidance material contained in ICAO PANS-OPS, Volume I Flight Procedures, Part III, Section 3, Chapter 3, Operation of ACAS Equipment, including Attachment A (ACAS Training Guidelines for Pilots) and Attachment B (ACAS High Vertical Rate Encounters).	
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