

European Aviation Safety Agency

Summary of the survey on Aerodrome Flight Information Service

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EXECUTIVE SUMMARY

The Agency has initiated Rulemaking Task 0464 with the purpose of establishing a comprehensive regulatory framework addressing the provision of ATS within the EU legislation, based primarily on the transposition of ICAO provisions. Such ICAO provisions however do not address explicitly and with a sufficient level of details Aerodrome Flight Information Service (AFIS). In order to gather information on the characteristics of AFIS provision throughout the EASA Member States, a survey was issued and submitted to the Members of ATM/ANS and Aerodromes (ADR) TAG and Sub-SSCC, who could provide their feedback from 20 August till 16 October 2015. The questions therein were developed on the basis of the AFIS-related issues subject to discussion in the context of the Rulemaking Task 0464 activities. This document includes the results of the survey, in particular the quantitative and qualitative analysis of the responses received.

The Agency wishes to express its thankfulness to all the respondents who have enabled establishing a deeper knowledge on this safety issue.

Disclaimer

The number of answers to this survey cannot ensure that the results are exhaustively representative of the sector. Therefore the interpretation of the results has to be cautious. The Agency strongly recommends that you contact us (impact.assessment@easa.europa.eu) for any questions on the usage of the survey.

The following summary of the survey has been done in order to give a short feedback to the respondents for each question they have answered. Further analysis are being performed by the Agency to assess how to use it in its programming activities.

Survey map

Audience: Member States; competent

authorities; air navigation service providers; air traffic controllers; aircraft operators; professional organisations; trade unions; pilots;

passengers

Addressees: ATM/ANS and Aerodromes TAG and Sub-SSCC

Survey period: 20 August to 16 October 2015

Tool: EUSurvey website





European Aviation Safety Agency

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BACKGROUND

The European Aviation Safety Agency (hereinafter referred to as the 'Agency') has initiated a regulatory activity (RMT.0464) to establish common EU requirements concerning the provision of air traffic services (ATS). The proposed measures are based on the relevant applicable ICAO Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS), but particular consideration is also given to the identification of common European practices, as well as of gaps in the current ICAO regulatory framework, to further complement the proposed requirements.

In the context of this regulatory activity, the Agency evaluated the necessity for and the content of specific safe and proportionate measures concerning the provision of aerodrome flight information service (AFIS), in consideration of the absence of related detailed and explicit ICAO and EU provisions and with a view to harmonising the increasing and diverse implementation of such service throughout EASA Member States. Aside from the development of draft measures, the work undertaken by the Agency, supported by the Rulemaking Group (RMG) for rulemaking task RMT.0464, has allowed to identify a number of controversial issues which were subject to discussion. The formulation of balanced, proportionate and justified regulatory proposal on such issues requires the availability of additional information and the provision of input from stakeholders.

For this purpose, the Agency decided to gather additional information on existing practices and trends throughout the EASA Members States on the provision of AFIS. A questionnaire was issued and submitted to the Members of ATM/ANS and Aerodromes (ADR) TAG and Sub-SSCC, who could provide their feedback from 20 August till 16 October 2015. The questions therein were developed on the basis of the issues subject to discussion in the context of the RMT.0464 activities, as well as on the outcome of Standardisation Inspections routinely undertaken by the Agency.

The present document presents an analysis of the responses received from the stakeholders, for the purposes of the RMT.0464 activities. The results from this analysis are considered for the establishment of the regulatory impact assessment on the proposed AFIS provisions.



OVERVIEW OF RESPONSES RECEIVED

The Agency received 37 responses from 27¹ States covering most of the European territory, more precisely from:

- 22 EU Member States²;
- 3 so-called 'EASA Members States' (Norway, Switzerland, Iceland); and
- 2 European Civil Aviation Conference (ECAC) non-EU Member States with working arrangements with EASA. (Moldova and the former Yugoslav Republic of Macedonia).

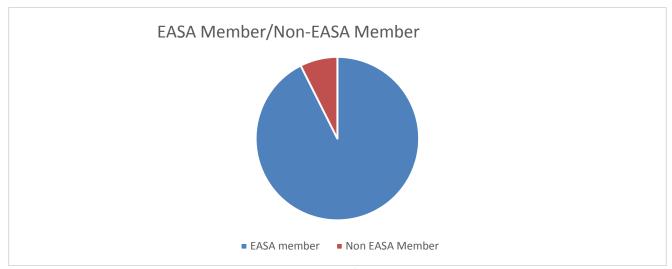


Figure 1: EASA member/non-EASA member

The majority of responses (23) were received from civil aviation authorities (CAAs), of which 18 from EU Members States, 3 from the aforementioned 'EASA Member States' and 2 from the aforementioned 'ECAC non-EU Member States'.

The remaining responses (14) were received from other entities located in the EU Member States, and more precisely: 4 associations (and more specifically 2 airport operator associations and 2 ATCO/FISO associations), 3 ANSPs, 3 airport operators, 2 trade unions, 1 manufacturer and 1 AFIS officer.

Austria, Belgium, Bulgaria, Czech Republic, Denmark, Estonia, Finland, France, Germany, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Portugal, Slovakia, Slovenia, Spain, Sweden, and United Kingdom.



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Please note that for Bulgaria, the reply of European Regional Aerodromes Association was taken into consideration.



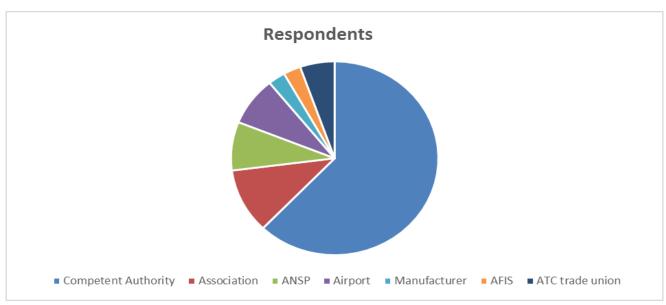


Figure 2: Respondents per type of organisation

The graphic above shows that, by responding to this questionnaire, a large part of the European CAAs showed interest in the AFIS subject; their feedback, together with the contribution from other categories of stakeholders, enabled the Agency to collect a wide range of information about this typology of ATS provision.

Please note that there are cases where responses received from different typologies of stakeholders (CAA, ANSP, airport operator, association) from the same State show discrepancies and/or indicate opposite elements of information for the same question. In such cases, when the question aims at gathering information on the existing arrangements, this analysis considered valid the response received from the CAA; in other cases, when the question aims at gathering opinions more than facts, the responses of several stakeholders were treated as equal.



ANALYSIS OF RESPONSES RECEIVED

Question No 1

Are there aerodromes in your State where aerodrome flight information service (AFIS) is provided?

Respondents from 18 out of 27 States declared that over the territory of their States there are aerodromes where AFIS is provided.

This number shows that AFIS is a widespread typology of ATS provision in Europe. In other States, such as in Belgium, Slovakia and the former Yugoslav Republic of Macedonia, AFIS provision is not yet in place, but the CAA declared that there are plans to proceed to its implementation.

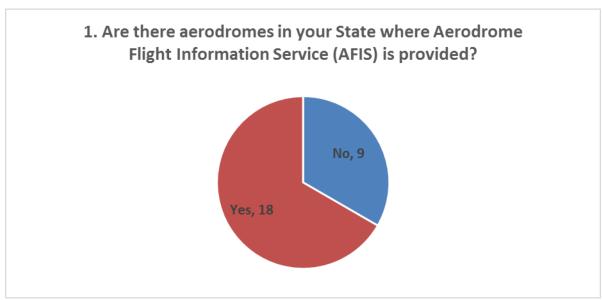


Figure 3: Overview of replies to Question No 1

How many aerodromes are there where AFIS is provided?

According to the information gathered, there are 241 AFIS aerodromes in the 18 States which declared having such service implemented. The States with the higher number of aerodromes where AFIS is provided are France (67), Norway (33), United Kingdom (28), Germany (25), Sweden (16), and Italy (14), with several other States with a smaller number of such aerodromes. The following table shows the number of AFIS aerodromes per State:



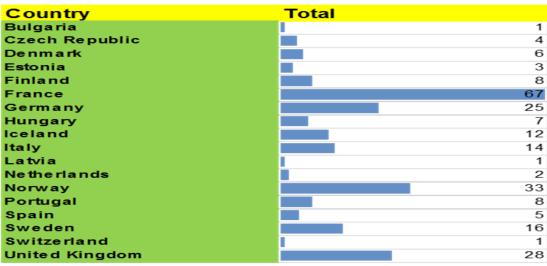


Figure 4: Overview of number of AFIS aerodromes per country

What types of traffic (General Aviation traffic, commercial traffic, IFR, VFR, etc.) operate from these aerodromes?

Several responses indicate that States have not established any limitation with regard to the type of traffic which may operate from AFIS aerodromes. Therefore, AFIS aerodromes support General Aviation traffic (GAT), IFR (instrument flight rules) and VFR (visual flight rules) flights, with commercial operations (but without indicating if domestic and/or international) as well as General Aviation operations, the latter appearing to be the majority of the flights. Some responses explicitly specified that commercial aviation operations include passengers scheduled and charter flights; other responses indicate that also cargo flights operations, business aviation operations, as well as military aviation operations are undertaken at their AFIS aerodromes. Limitations of operations to a specific category of flights (e.g. VFR) was indicated only for a few cases for specific aerodromes.

If available, figures of movements per year (per aerodrome).

Many respondents made available a comprehensive and detailed set of data, established on a yearly basis, about the overall number of movements for AFIS aerodromes. For instance, the Norwegian CAA provided data on movements in AFIS regional, local and private aerodromes showing a total of about 181 000 domestic/international/offshore/other movements during 2015. In some cases, respondents indicated the number of commercial flights in addition to the overall number of movements. This is in particular the case of France, which made available this information for 67 AFIS aerodromes.

The analysis of the available information shows that many of these aerodromes have medium/low traffic figures (hundreds, or a few thousands movements per year), with low figures concerning commercial operations. However, there are some aerodromes with a significant number of movements on a yearly basis, with a relevant number of commercial operations. Examples in this case are Lyon Bron (France) with 54 694 movements, out of which 6 494 were commercial operations; La Mole (France) with 7 345 movements, out of which 2 410 commercial operations; Bolzano (Italy) with approximately 14 000 movements, out of which 2 255 of commercial aviation (in 2013); and LKKU (Czech Republic) with 15 964 movements, out of which 450 commercial operations. From the data made available by 'Union des Aeroports Francais' (French Airports' Association), it results that in 2014 in France 1 049 227 movements were registered at aerodromes where AFIS is provided, out of which 35 333 were commercial operation movements, about 3,4 % of the total.



The analysis of the available data shows that, throughout EASA Member States, AFIS is indeed implemented to support different types of operations, and that the number of movements it accommodates as well as the types of operations supported (in particular with regard to categories such as IFR and commercial flights) do not seem to constitute a decisive factor or a limitation in making a decision to provide this type of ATS.

Figure 5 shows the ratio between the commercial aviation operations and the overall movements at AFIS aerodromes, for which information was received. The figure shows that the percentage of commercial aviation operations over the total movements is variable.

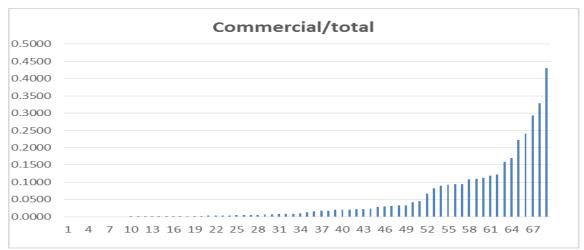


Figure 5: Ratio between commercial and total movements in AFIS aerodromes. The X-axis represents the aerodromes taken into account (69 aerodromes in total). The Y-axis represents the percentage of commercial movements over the total (max value 0,43= 43 % of total movements in a specific aerodrome were commercial aviation operations).

In terms of number of flights per aerodrome, an analysis has been performed based on the information provided. From Figure 6, it seems that a relevant number of AFIS aerodromes have between 10 000 and 20 000 flights per year.

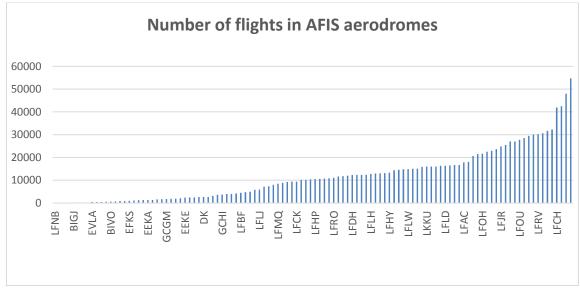


Figure 6: Overview of number of flights in AFIS aerodromes



Are there aerodromes with an alternation of ATC and AFIS service provision?

There are 10 States where in some aerodromes an alternation between ATC and AFIS provision is established in some of their aerodromes, that is more than half of the States that confirmed the use of AFIS (10/18). Respondents from 9 States declared that such alternation is not in place in the aerodromes under their jurisdiction. Respondents from 7 States (mostly those where there is no AFIS aerodrome) did not reply to this question. In one reply (Denmark) it was mentioned that alternation is possible but not being used at the moment. A respondent mentioned that the alternation of AFIS and ATC is not a shared practice in the country (Norway).

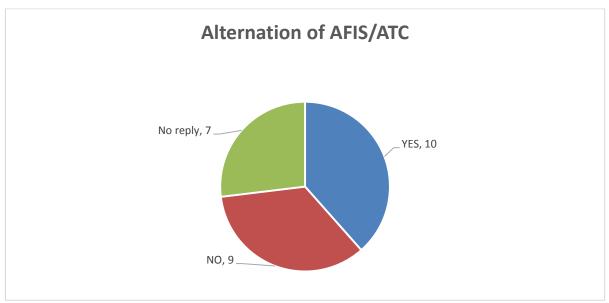


Figure 7: Alternation of AFIS/ATC

What are the related conditions for such alternation?

Many of the responses received indicate that ATC is usually provided when and where the traffic flow is expected to be significant, normally during the working days (frequently Monday to Friday), or in certain cases on a seasonal basis. ATC is usually provided in presence of scheduled traffic. AFIS instead is often provided during weekends or during those periods of the day when the traffic is expected to be low. Normally, the activation hours of both ATC and AFIS are notified via AIS means (AIP, NOTAM). From some responses it results that attention is paid to minimise fragmentation of periods and frequent alternation between the two services, in order to establish clarity and certainty on the ATS type provided at the aerodrome at any time.

Some special cases reported:

- In France, there is no regulation establishing the minimum conditions when AFIS is to be provided; therefore, the decision to render this type of service is left to the ANSP on a voluntary basis, when ATC is not provided.
- In Germany, even in presence of ATC at aerodromes, AFIS is always provided at aprons, and extended to the manoeuvring area and to the airspace surrounding the aerodrome when ATC provision ceases.
- In Denmark, AFIS can be replaced by an Air Traffic Services Reporting Office (ARO) during periods with low traffic intensity.



Question No 2

On which regulatory framework has your State established the provision of AFIS?

Respondents to this question could choose between several options (complementary, not substitutes): ICAO provisions, EU legislation, national legislation, Eurocontrol AFIS Manual, and other. The responses have highlighted that there are various regulatory sources which States consider when they have to establish, provide and oversee AFIS. Many responses indicate that, in line with their obligations towards the Chicago Convention, States apply the relevant Annex 11 provisions, which by the way are not very descriptive with regard to AFIS.

Many States also declare to adhere to the applicable provisions in the relevant EU legislation, in particular those in Regulation (EU) No 1035/2011 and Regulation (EU) No 923/2012 (the SERA Regualtion), which however do not contain specific and explicit requirements on AFIS provision. Some States developed specific provisions taking as a reference additional existing EU legislation on similar subjects such as requirements on medical fitness, age, training and qualification of AFIS officers which takes as reference the EU Regulation on ATCO licensing and medical certification (Regulation (EU) No 805/2011 and the newly published Regulation (EU) 2015/340).

The majority of these responses indicates that the provision of AFIS is therefore established by national regulatory acts, built upon the principles established in the aforementioned ICAO and/or EU documents. Some States declare that the content of ICAO Circular 211-AN/128 and/or of the EUROCONTROL AFIS Manual was considered as a reference when it was necessary to address specific organisational and operational aspects of AFIS in the national regulatory acts.

The situation described above confirms that there is an evident gap in the ICAO and in the EU legislation as regards addressing the technical aspects of AFIS provision. Furthermore, the existence of many different national regulatory acts on the subject, tailored on the specific local AFIS policy and based on common reference documentation, would represent a challenge in the identification of a proportionate and balanced set of EU measures that would contribute to increase harmonisation at EU level.

Question No 3

What is the set of information related to AFIS aerodrome that your State publishes with the aeronautical information products and services such as AIP, NOTAM, AIC?

The very large majority of respondents indicated that information regarding AFIS aerodromes and provision are published in the national AIS (in AIP, with NOTAMs, SNOWTAMs and AICs as necessary). Many States publish for AFIS aerodromes the same set of information as for aerodromes where ATC is provided. For instance: definition of AFIS units; phraseology for information; type of traffic; type of service provided; airspace (vertical and lateral limits, airspace classification, transition altitude, landing facilities).

Special cases reported:

 AIP of Slovakiac does not contain AFIS-related information. VFR AIP of Slovakia as regards uncontrolled Aerodromes uses Aerodrome Traffic Zone (ATZ) instead of AFIS. The reason for this solution is that there is no service provider certified to provide AFIS. Information about Aerodrome Traffic Zone (ATZ) can be found in the Slovak AIP Part ENR 1.2.1.5.10.



VFR Manual in Czech Republic is published with the objective of providing airspace users with complete overview of rules and procedures important for VFR traffic in FIR Praha, information about VFR aerodromes and a selection of information important for VFR traffic on IFR aerodromes (for example Hradec Kralove AFIS: map with VFR charter, frequency and call sign, text information including RWY parameters, procedures, local traffic regulations and restrictions, contacts, traffic circuits, traffic circuit altitude, noise abatement procedures, AFIS in Czech and English language and planning of flights, rescue and fire fighting service on the aerodrome, etc.).

Question No 4

Has your State established criteria for determining when an aerodrome has to be provided with AFIS, when with ATC or when no ATS has to be established?

Respondents from 10 States declared that such criteria are established.

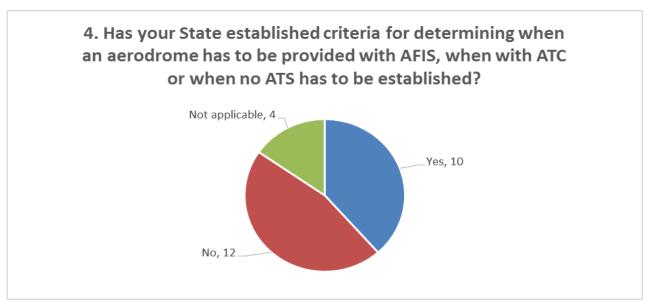


Figure 8: Overview of States establishing criteria for determining ATS provision at aerodromes

If yes, please specify these criteria as well as by which regulatory means such criteria are established.

The analysis of the 10 positive responses to the question above shows that there are differences in the approach undertaken by States to determine what type of ATS is to be provided at aerodromes.

An overview of these 10 responses shows that:

- An important criterion is the number of movements in given timeframes, with minimum thresholds for both VFR and IFR flights. This criterion is used in some States; however, the figures and the conditions vary, sometimes significantly.
- Traffic density and airspace complexity are considered as well.
- In some States, the presence of IFR procedures and/or of commercial operations renders mandatory the
 establishment of AFIS as a minimum. In one State, AFIS as a minimum is to be provided when General
 Aviation and/or charter flights are operated, while in presence of regular scheduled flights, ATC is to be
 provided.
- In other cases, an aerodrome categorised CAT II or III renders mandatory the provision of ATC.





- In some States, in addition of, or in lieu of, established strict criteria and related minima, the decision between ATC, AFIS or no service is made on the basis of the results of a safety assessment which considers all the aspects of aerodrome operations and the associated available services and facilities, as well as the typology of the intended flights operations. Such safety assessment is normally subject to approval of the CAA.
- Several respondents explicitly indicated the respective national regulatory act including the criteria for the determination of the type of ATS to be provided at the aerodrome.

In particular, is the typology of traffic a discriminating factor for establishing AFIS/ATC/no ATS?

6 respondents explicitly replied that the typology of traffic is a factor which influences the decision as whether ATC, AFIS or no ATS is to be provided at the aerodrome. It is interesting to note that all of these replied to the question on 'What types of traffic (General Aviation traffic, commercial traffic, IFR, VFR etc.) operate from these (AFIS) aerodromes?' with a long and comprehensive list of types of traffic.

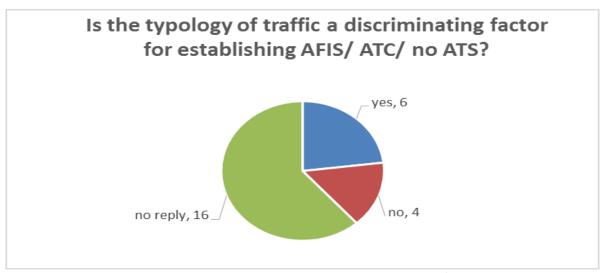


Figure 9: Type of traffic as discriminating factor for AFIS/ATC

Question No 5

Does your State designate the airspace associated to AFIS aerodromes?

Respondents from 14 States where AFIS is provided declared that the airspace associated with an AFIS aerodrome has to be designated. France declared that work is in progress to establish criteria for such designation.



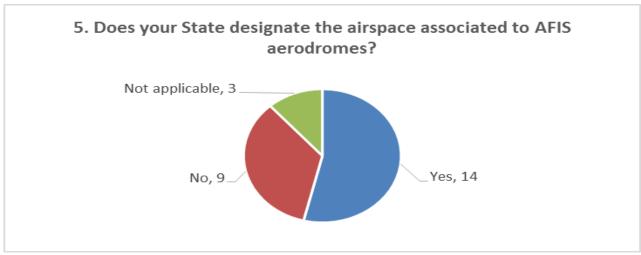


Figure 10: Overview of designation of airspace associated with AFIS aerodromes

If yes, what type of airspace structure (e.g. Air Traffic Zone or AFIS zone) and/or airspace classification is normally associated with an AFIS aerodrome?

The responses evidenced differences in the designation of such airspace, as follows:

- 5 States opted for a 'Flight Information Zone (FIZ)';
- 5 States opted for a 'Traffic Information Zone (TIZ)'; and
- 4 States opted for an 'Aerodrome Traffic Zone (ATZ)'.

The large majority of the respondents, but not all, declared that the designation included the classification of the selected airspace structure, being in the very large part of the cases Class G.

The large majority of the respondents, but not all, declared that mandatory radio contact is required to operate within the selected airspace structure (called RMZ or just 'radio contact compulsory' or similar).

If no, what is the reason for not designating the associated airspace?

Iceland replied that for some aerodromes a TIZ has been established, but not for all. In such cases, it has been required that the ANSP explicitly states, in the AFIS working procedures, within which airspace AFIS is provided.

Germany (airport operator) replied that 'AFIS provision is not a prerequisite for any airspace according to SERA'.

Question No 6

Has your State established specific procedures for AFIS provision, other than those in the applicable ICAO Annex 11 and PANS ATM requirements?

Respondents from 9 States declared that AFIS procedures additional to those in the ICAO documentation are established in their State.

Respondents from 13 States declared that AFIS procedures additional to those in the ICAO documentation are not established in their State.





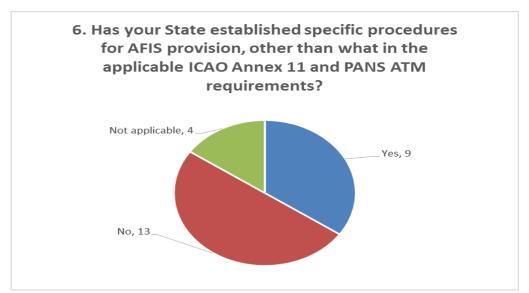


Figure 11: Establishment of specific procedures for AFIS provision other than than those in the applicable ICAO Annex 11 and PANS ATM requirements

If yes, please list and describe these procedures.

The responses provided did not include precise information about the details of such procedures, which are usually established via national regulatory documents (Decrees and/or Manuals). It can be understood that for the majority of respondents, such procedures are developed in alignment with and further detailing applicable Annex 11, Doc 4444, Regulation (EU) No 1035/2011 and Regulation (EU) No 923/2012, as well as with AFIS-specific national regulations.

The list below includes some of the subjects covered:

- alerting service;
- meteorological services;
- air-ground and ground-ground communication;
- aerodrome-reporting office competences;
- flight planning procedures; and
- information (in the case of UK, information to aircraft in flight and instructions to aircraft, vehicles and persons on the ground) provision.

If no, please specify what are the applicable procedures.

Respondents provided different justifications to explain why their States have not established specific procedures in addition to those in ICAO documents; some of them highlighted the fact that there is no need for specific procedures, as AFIS is flight information service only, and as such existing ICAO FIS provisions and, when available, EU regulation apply.



Question No 7

Which of the two following practices is applied at AFIS aerodromes in your State to select the runway in use (The runway in use is selected by the pilots on the basis of the information received by ATS or the runway in use is established by the AFIS Officer)?

Respondents from 13 States declared that their national AFIS regulations stipulate that the runway in use is established by the AFIS officer, while respondents from 11 States declared that the runway in use is selected by the pilots on the basis of the information received by ATS.

There were 3 States (Estonia, Italy and Spain) for which divergent responses were received from different categories of respondents.

It is to be noted that responses to this question were received also from respondents which declared that AFIS is not implemented in their State. Nevertheless, these responses are considered in this assessment, as a contribution from a qualified source to define this issue.

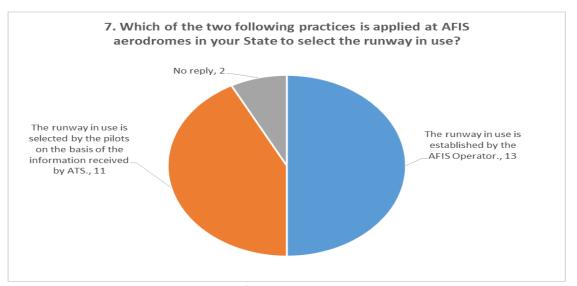


Figure 12: Overview of practices to select the runway in use

Question No 8

With reference to Question No 6, do procedures for AFIS established by your State consent the AFIS unit to provide services other than Flight Information Service and Alerting Service (e.g. Meteorological observations, provision of instructions to aircraft, vehicles and persons on the ground)?

Respondents from 3 States declared that the issue is not applicable to them.

Respondents from 6 States declared that AFIS units within their States are not allowed to provide additional services other than AFIS and Alerting Service.

Respondents from 16 States declared that in addition to AFIS and Alerting Services, AFIS units are allowed to provide additional services.



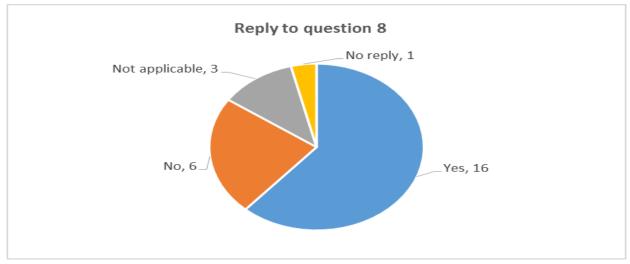


Figure 13: Services by AFIS unit other than FIS and Alerting Services — Replies to Question No 8

If yes, please list and provide more details on these services, in particular about the rationale for establishing this additional service provision.

13 of them declared that AFIS units are also in charge of providing MET services; in many cases, this is limited to observations, but in some cases AFIS officers deliver also other MET services, which are dependent upon the extent and the typology of flight operations at the aerodrome.

7 respondents declared that in their States AFIS officers are authorised to provide instructions to aircraft, vehicles and persons on the ground — one of which using the expression 'to control'. 3 respondents declared that in their States AFIS officers are authorised to provide instructions to, or to coordinate, vehicles and persons, but not to aircraft, on the manoeuvring area. One of these explicitly declared that instructing aircraft would be considered to be ATC (and not AFIS) provision.

Other services reported to be provided by AFIS officers were:

- communication services;
- ATS reporting office function;
- apron management service in low traffic density aerodromes (subject to a safety assessment);
- search and rescue; and
- aircraft parking.

Has your State conducted an assessment to support the provision of such additional services?

It is interesting to notice that 7 Member States have conducted an assessment to support the provision of such additional services.

Further clarifications on the assessment conducted were asked to respondents. One reply mentioned that 'an AFIS provider, as a certified ANSP shall fully comply with Common Requirements (CR)' and it shall 'manage the safety of all their services. In doing so, they shall establish formal interfaces with all stakeholders which may influence directly the safety of their services'. [...] Our inspectors oversee the content of these contracts and of course, its efficiency and the service level provided where it may influence the safety of service provision. In case of MET the service provision shall be in accordance with ICAO standards which is also regularly audited by





our inspectors. We used to test both AFIS and MET providers during audits by testing AFIS workstation and local met office'.

Question No 9

Has your State established language (National, English) requirements for the provision of AFIS?

Respondents from 3 States declared that the issue is not applicable.

Respondents from 7 States declared that their States did not establish language requirements for the provision of AFIS. The respondent from Belgium declared that work is in progress on this subject.

Respondents from 16 States declared that their States established language requirements for the provision of AFIS.

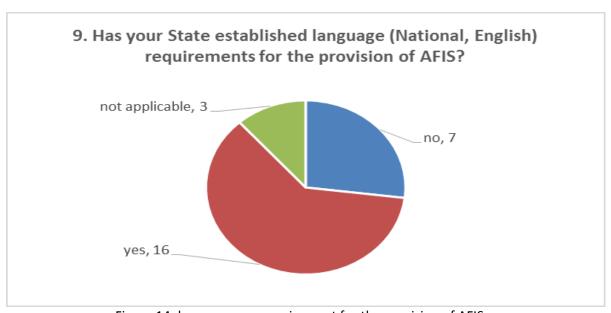


Figure 14: language as a requirement for the provision of AFIS

If yes, please specify in what languages AFIS is to/may be provided.

11 respondents out of the 16 declaring that language requirements were established state that AFIS may/has to be provided both in national language and in English language. 5 of them reported that ICAO English language proficiency level 4 is required for the AFIS officers while a few indicating that knowledge of aviation vocabulary would also be desirable.

3 respondents declared that AFIS is provided in English language only, including UK which underlines that in its case no language proficiency requirements are specified.

One respondent declared that, based on national regulation, the decision of the language to be used for AFIS provision is made by the CAA on a case-by-case basis; however, AFIS officers are in any case required to hold ICAO English language proficiency Level 4.

Italy (ENAC) declared that ATS are provided in English language to IFR flights in all circumstances and to VFR flights at or above FL195, while Italian or English language is used to VFR flights below FL195. Therefore, an AFIS officer providing services to IFR flights must use the English language.



Question No 10

Has your State established a specific phraseology to be used for the provision of AFIS, in addition to the ICAO phraseology established for FIS?

Respondents from 3 States declared that the issue is not applicable.

Respondents from 15 States declared that their States have not established a specific phraseology for AFIS.

Respondents from 8 States declared that their States have established a specific phraseology for AFIS.

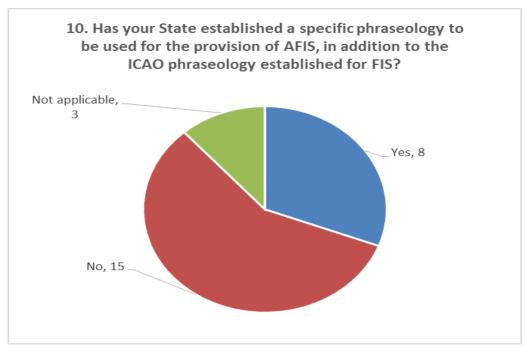


Figure 15: Specific phraseology for AFIS

If yes, please indicate if the AFIS phraseology is established for:

both national and English languages: affirmed by respondents from 6 States

the English language: affirmed by respondents from 2 States (Switzerland and United Kingdom)

Further clarifications were asked from the respondents on the phraseology developed: traffic information, maintain runway safety, clearances for GND movements, ground movement, take-off, landing and transit, information that no tower ATC services are provided, (runway in use/free/occupied/available for line up), report position/report passing. One reply referred to minor additions to ICAO standards.

Question No 11

Has your State established criteria and/or regulations for the recruitment and qualification of AFIS officers?

Respondents from 3 States declared that the issue is not applicable.

Respondents from 8 States declared that their States have not established criteria and/or regulations for the recruitment and qualification of AFIS officers.





Respondents from 15 States declared that their States have established criteria and/or regulations for the recruitment and qualification of AFIS officers. It is to be noted that in the case of 3 States, there were divergent responses between CAAs and aerodrome operators or ANSPs.

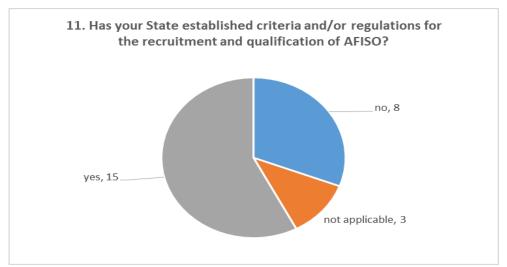


Figure 16: Recruitment and qualification of AFIS officers

Below, the analysis of the responses provided per criterion concerning recruitment and qualification of AFIS officers proposed by the Agency within Question No 11

Minimum age

- Respondents from 10 States declared the minimum age is set at 18 years;
- Respondents from 3 States declared the minimum age is set at 21 years;
- The respondent from 1 State declared the minimum age is set at 20 years; and
- The respondent from 1 State declared that no minimum age is set.

Minimum education

- Respondents from 6 States declared that a high school diploma or equivalent is required to access the profession;
- Respondents from 3 States declared that no education diploma is required to access the profession;
- The respondent from 1 State declared that requirements for the access to the profession are identical to those established in Regulation (EU) No 805/2011 for ATCOs;
- Respondents from 2 States declared that having successfully completed a professional course for AFIS
 officers is necessary to access the profession; and
- The respondent from 1 State declared that the recruitment criteria of AFIS Officers are established in the approved training plans, without specifying further.



Knowledge

- Respondents from 14 States declared that the successful completion of a training path is a prerequisite in order to operate as an AFIS officer. The types of AFIS training vary across States: in some cases, the responses indicate that the training path is well defined, with initial, unit and continuation training established, while in other cases there is a mere indication of the need to complete an 'AFIS training' for which elements of information are not exhaustive (examples: 'completion of AFIS Course', or 'Relevant parts of CCC', or 'Listed in TSFS 2009:81-National regulation', or 'The successful completion of basic and on-the-job training with examination', or 'in accordance with approved training plan').
- The respondent from 1 State declared that the applicants for an AFIS officer Licence have to pass multiple-choice examinations on specified subjects in order to obtain a certificate of competence as radio operator, in addition to fulfilling national requirements for the issue of an AFIS officer licence; however, the answer does not provide further details about the associated training (if any).
- Respondents from 4 States explicitly declared that the AFIS officer training is certified by the CAA.

Precedent experience

- Respondents from 13 States declared that in their States precedent experience in aviation and/or in ATS provision is not a prerequisite to access the profession of AFIS officer. One of these respondents declared that such prerequisites are the same as those established for student ATCO licensing in Article 8 of Regulation (EU) No 805/2011.
- Respondents from a few States explicitly declared that applicants with a previous professional experience as ATCO, pilot or engineer would be considered to adapt the training path leading to the qualification as AFIS Officer, or considered to be advantageous skills. One of these States, which has an AFIS officer licensing scheme established by national regulation, has established the list of exemptions based on previous professional experience to be considered to shorten the established licensing processes. Such experiences cover the possession of an ATCO licence, or of a Military ATCO Certificate of Competence, both with an aerodrome-related unit endorsement and under specified conditions, as well as the possession of a Flight Crew license.

Language proficiency

- Respondents from 14 States declared that the possession of a specified language proficiency level is a requirement for the access to the profession of AFIS officer. Respondents from 2 States declared that the only language for which a proficiency level is required from applicants is English. Respondents from 12 States declared that knowledge of English and of the national language is envisaged. In many of these States, an ICAO language proficiency Level 4 is required under all circumstances, while in a few cases, only under specified conditions (in Italy, when AFIS supports IFR operations and in France, for specific aerodromes as established in the AIP, English language proficiency level B1 and knowledge of aeronautical vocabulary are required).
- The respondent from one State declared that there is no language requirement, but that the possession of ICAO language Proficiency Level 4 in English and in the national language 'is a good foundation, since it cannot be accomplished during training'.

Any other criteria

Respondents from 6 States declared that a medical certificate Class 3 is required;





- Respondents from 2 States declared that a medical certificate equivalent to Part-FCL Class 2 or above is required;
- Respondents from 2 States declared that a valid 'medical certificate' is required, though without specifying;
- Respondents from 2 States declared that a radio operator licence or an aviation radio communication licence is required; and
- Respondents from 2 States declared that a 'Background check' shall be performed.

Does your State issue a licence or a certificate to AFIS Officer?

- Respondents from 13 States declared that within their States an AFIS licence or certificate is issued; and
- Respondents from 2 States declared that within their States an AFIS licence or certificate is not issued.

The analysis of responses shows that the majority (13 out of 18) of States with aerodromes where AFIS is provided have established a qualification scheme for AFIS officers, thus recognising the safety relevance of this profession and the need for an appropriate qualification and maintenance of competency. The information available on such licensing or certification schemes is not detailed enough to allow a complete analysis. Should the Agency decide to initiate a regulatory activity on this subject, further action is required to gather more detailed evidence.

Question No 12

Has your State established requirements concerning the training of AFIS officer?

- Respondents from 3 States declared that the issue is not applicable.
- Respondents from 8 States declared that their States have not established requirements for the training of AFIS officers.
- Respondents from 15 States declared that their States have established requirements for the training of AFIS officers.

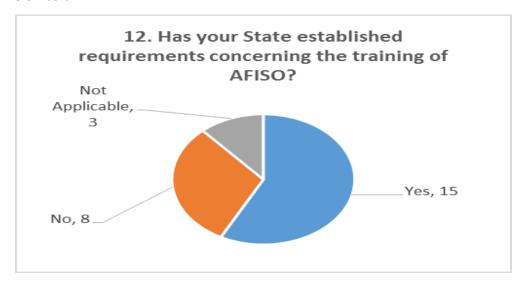


Figure 17: Requirements for AFIS officer training





If yes, how is training linked with the qualification and the ability to provide AFIS?

The very large majority of respondents from the 15 States declaring that their States have established requirements for the training of AFIS officers stated that successful completion of a training course, in many cases to be approved by the CAA, is a mandatory prerequisite for the issue and the continued validity of the AFIS officer licence or certificate. In many of these States, the structure of the training for these purposes replicates what is established for ATCOs (initial, unit and refresher training), while in some cases initial and onthe-job training are required.

UK instead has not established the obligation for applicants to attend and successfully complete a training course; applicants are required to successfully pass exams on specific subjects and then to undertake a minimum of 40 hours of service provision under supervision at the aerodrome, before a final examination is undertaken.

The subject regulation in the Netherlands stipulates that training requirements are established by a training plan (most likely to be developed for the specific aerodrome) which has to be approved by the CAA.

Please provide more details concerning the duration, the phases and the content of the training course(s).

Responses provided to this question evidenced that training is organised and delivered in a very diverse manner throughout the considered States. This diversity affects the structure of the training (although many of them seem to have adopted the same scheme as for ATCO training — see under Question No 11), the duration of its phases, in some cases even the subjects taught during the training. In many States, AFIS officer training is established by national regulations and needs to be approved by the CAA. At national level, flexibility in the training content and structure seems to be allowed only as far as the on-the-job training is concerned and depends upon the local aerodrome operations. A common denominator for the duration of such courses could not be identified by the responses: it varies significantly from a limited number of days/hours to several months.

The analysis suggests that, apart from the initial training phase, where a common background preparation of AFIS officers is established, it would be challenging to identify common requirements for the remaining phases of the training, which are indeed dependent upon the local aerodrome operations. This is another subject for which further and more detailed information would be required, in case the Agency would consider making a decision to draft ad hoc regulation in order to solve the lack of harmonisation.

Question No 13

Has your State established requirements for the aeronautical mobile service (air-ground communication) facilities for AFIS units?

Respondents from 4 States declared that the issue is not applicable.

Respondents from 6 States declared that their States have not established requirements for the aeronautical mobile service facilities for AFIS units.

Respondents from 16 States declared that their States have established requirements for the aeronautical mobile service facilities for AFIS units.



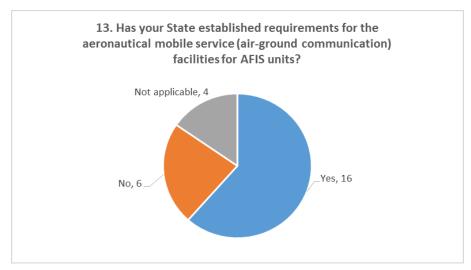


Figure 18: Aeronautical mobile service for AFIS units

If yes, please describe the main elements of such requirements.

Respondents from 11 States (explicitly or implicitly) declared that requirements for AFIS units are identical to those established in ICAO Annex 11 for aerodromes control towers.

Respondents from 4 States declared that such requirements are established in national regulation, with specified characteristics. Only one of these respondents declares that national regulation adheres to 'international standards', while 2 respondents refer to 'technical standards', in both cases without further specifying.

Respondents from 2 States declared that the requirements are set to cover the airspace concerned, established as RMZ or TIZ/TIA.

With respect to the main elements, reference has been in many cases made to radio, voice, communication, distance and recording requirements.

Question No 14

Has your State established requirements for the aeronautical fixed service (ground-ground communication) facilities for AFIS units?

Respondents from 4 States declared that the issue is not applicable.

Respondents from 9 States declared that their States have not established requirements for the aeronautical fixed service facilities for AFIS units.

Respondents from 13 States declared that their States have established requirements for the aeronautical fixed service facilities for AFIS units.



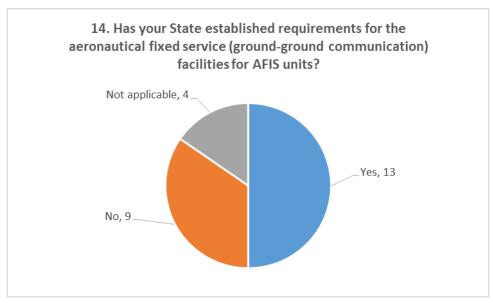


Figure 19: Aeronautical fixed service for AFIS units

If yes, please describe the main elements of such requirements.

Respondents from 8 States (explicitly or implicitly) declared that requirements for AFIS units are identical to those established in ICAO Annex 11 for aerodrome control towers.

Respondents from 3 States declared that the aeronautical fixed service for AFIS includes communication facilities with relevant units and services, such as variously ASM, ATFM, FIC/ACC, rescue and firefighting, ARO, as well as availability of connection capabilities with the phone network. Recording and retention facilities are to be provided as well.

Respondents from 2 States declared that the aeronautical fixed service for AFIS is established in national regulation, without providing additional elements of information.

Question No 15

In addition to the subjects addressed in the questions above, please describe if there are aspects of AFIS provision which in your opinion require to be further harmonised by the EU legislation.

Responses received to this question indicate that the interest and the expectations for the work undertaken by RMT.0464 on AFIS provision is high. Various categories of stakeholders highlighted a significant number of issues for which they would like to have at least a harmonised approach established via EU legislation.

The following list summarises all the responses to this question and includes the issues for which regulatory action is suggested by respondents. Some of the issues below were indicated by more than one respondent.

- A clear definition of AFIS, with the basic elements of the service clearly established (provision of information and/or instructions, use of surveillance support, etc);
- The definition of criteria for determining when an aerodrome has to be provided with AFIS;
- The definition of requirements for an (ad hoc) airspace designation and classification for the airspace surrounding the AFIS aerodrome;
- The definition of the specific Meteorological Services requirements specific for AFIS;





- The definition of a standard AFIS phraseology;
- The definition of criteria to better define the use of surveillance in AFIS provision;
- The definition of communication requirements for AFIS, including recording and retention of records;
- The definition of qualification, training and medical requirements for AFIS officers;
- The definition of operational procedures for mixed IFR/VFR operations, for multiple IFR operations, for the interface with ground movements (vehicles, persons, aircraft);
- The definition of criteria for landing priority;
- Besides the development of any set of requirement addressing AFIS provision and training, consideration should be given to the methods of oversight for such requirements; and
- Licensing for AFIS provisions is still under national requirements while the provision is already under EU legislation.

Two respondents highlighted the fact that, by having at least a minimum set of requirements for AFIS provision, pilots could have an increased awareness and certainty of at least the fundamental elements of the types of services and procedures in place at any AFIS aerodrome throughout Europe. With the current situation, there is a huge diversity in this respect and this generates confusion and potential hazards to the safety of operations.

Some respondents invite the Agency to consider establishing EU rules only to the extent necessary to establish harmonisation in the fundamental elements of AFIS provision, and to leave the necessary flexibility to States and services providers to address the specific local aspects.

Full Time Equivalent (FTE) working on AFIS

In order to quantify the human resources dedicated to the provision of services from AFIS providers, an additional question was asked to the ones who responded to the survey on the number of persons working on AFIS in FTE terms. A sample of replies indicate the following:

- Denmark: 'approx. 66 if we take Greenland and faro islands in to account'
- Spain: 'As an estimation, there are approximately 20 persons FTE working on AFIS in the 4 airports (GCHI, GCGM, LEHC, LEBG)'
- France: 'about 200 AFISO for 69 aerodromes, an average 3 FTE per aerodrome'
- Czech Republic: 'LKKU has 3 AFIS dispatchers (on labor agreement) who provide service mostly on summer weekends and on request throughout the year" and "LKHK 11+1; LKCS 41; LKLT 12+1"
- Finland: 'For Finavia units/aerodromes, 8 AFIS persons (FTE)'
- Norway: 'we estimate it to be approximately 170 AFIS Officers and 25 HFIS Officers'

