



Licensing and medical certification of air traffic controllers
(Appendices to Part-ATCO, Part-ATCO.AR
and Part-ATCO.OR)

CRD to NPA 2012-18 (B.III(a)) — RMT.0153 (ATM.003(a)) & RMT.0154 (ATM.003(b)) —
02/10/2013

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1. Individual comments and responses

In responding to comments, a standard terminology has been applied to attest the Agency's position. This terminology is as follows:

- (a) **Accepted** — The Agency agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — The Agency either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — The Agency acknowledges the comment but no change to the existing text is considered necessary.
- (d) **Not accepted** — The comment or proposed amendment is not shared by the Agency.

(General Comments)

-

comment

67

comment by: *Luca Valerio Falessi*

NPA 2012-18 (B.III)

General comment:

It's should be useful to define at least a minimal core training for OJTI, Competence Assessor and STDI endorsement

response

Noted

Training requirements for practical instructors and assessors are proposed in Subpart D, Section 5 of Part-ATCO, accompanied with detailed AMC material, which are to be found in the file B.III.

comment

71

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

· The EMPIC software-database will be seriously affected by the new EASA Regulation (update is very expensive), therefore we urge EASA to establish a standardised, common ATCO licensing software – database, taking into account EASA ATCO licence specifications.

response

Noted

The relevant Appendix is developed based on Annex I (Specifications for licences) of Commission Regulation (EU) No 805/2011 and aligned with the requirements contained in ICAO Annex 1. The goal of the ATCO licence format is to establish a harmonised layout throughout the Member States, which is used by all Member States in the same way in order to facilitate mutual recognition. The tool(s)/software used to enable the issue of ATCO licences is up to Member States concerned.

comment	87	comment by: <i>CANSO Civil Air Navigation Services Organization</i>
	<p>For clarity with regards to the CANSO comments, please take note of the following editorial convention (valid for all books):</p> <ul style="list-style-type: none"> Text proposed for deletion is stroke-through Text proposed for insertion is shaded 	
response	Noted	

NPA 2012-18 (B.III) 'Appendices to draft Commission Regulation (EU) No .../... (Part-ATCO, Part-ATCO.AR and Part-ATCO.OR)' – General comments

p. 1-4

comment	28	comment by: <i>ACCCT TF</i>
	<p>ACCCT TF Comments</p> <p>Although it was agreed to submit all ACCCT TF comments in the respective AMCs (NPA 18-2012 B.V) I decided to repeat the comments that concern subject objectives, topics and subtopics here in the respective Appendices (NPA 18-2012 B.III) for clarity. They include all changes agreed during the five ACCCT TF meetings conducted between February 14th and November 16th 2012. The rationale for modified topics and/or subtopics (when appropriate) are not provided here but in the comments already submitted for the AMCs.</p> <p>To decode the changes the following conventions have been used:</p> <p>Deleted information is shown with the striketrough-effect</p> <p>Relocated information is shown with the striketrough-effect</p> <p>New information is shown in blue text.</p>	
response	Noted	

APPENDIX 1 – FORMAT FOR LICENCES – AIR TRAFFIC CONTROLLER LICENCE

p. 5-10

comment	32	comment by: <i>skyguide Corporate Regulation Management</i>
	<p>APPENDIX 1 FORMAT FOR LICENCES</p> <p>(A) Content. The item number as defined in point 1 and 2 below shall always be printed in association with the item heading. Items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form as prescribed below. Any separate or detachable part shall be clearly identifiable as part of the licence.</p> <p>The "item heading" is unclear and this brings no added value.</p>	

Appendix 1(A).1.II

Title of licence

It remains unclear what the title of the licence is as ATCO and student ATCO figures in the next item.

Appendix 1(A).1.III

~~serial number of the licence with the United Nations (UN) country code of the State of licence issue and followed by '(ST)ATCOL' (Student) ATCO licence and a code of numbers and/or letters in Arabic numerals and in Latin script.~~

Using the UN country code brings no added value as the state of issue is item (I) and is therefore identified de facto. Should the ATCO change country, a new licence with a new number will be issued.

STATCOL and ATCOL are new abbreviations. Introducing them here and nowhere else brings no added value. We suggest to use the words (student) ATCO licence.

Appendix 1(A).1.VI

Nationality

This does not bring any added value and may also change. Suggest to remove.

~~**Appendix 1(A).1.IX**certification of validity and authorisation for the privileges granted, including the dates when they were first issued~~It is unclear what is referred to here. A sentence certifying the validity or the expiry date of the ratings and endorsements which is already covered in the variable part Appendix 1(A). 2.XII? Suggest delete.

Appendix 1 (B)

Either a photograph of the licence holder shall be integrated in the licence or a legal identification document containing a photo shall be carried for the purposes of identification of the licence holder.

As the licence is an official document delivered by an authority recognised, and even appointed by, the state, it would be simpler to integrate a photograph in the licence for identification purposes. This option should at least be available to states wishing to do so.

Appendix 1(C)

Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used ~~and the items mentioned under point (a) must appear clearly thereon and items I to IV and VII must appear thereon.~~

It brings no added value, particularly in the light of moving towards electronic licences, to require all items in (A) to appear on the licence. Furthermore, either the licence will have to be big or the writing small to accommodate all this information. We suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence.

response *Partially accepted*

(A) Content: the text is simplified, but not deleted considering the requirements of ICAO Annex 1, 5.1.4 Arrangement of items. Changing the requirements would require filling the differences.

(A)1.II: The Agency takes consideration of the comment and the title of the licence is modified. The amended title is (STUDENT) AIR TRAFFIC CONTROLLER LICENCE.

(A)1.III: It is required the competent authorities to maintain a list of all organisation certificates and personnel licences and certificates it issued. The proposal on deletion of the serial number of the licence and the subsequent information is not accepted as it is required by ICAO Annex 1, 5.1.1. Details. Furthermore, it will ensure adequate storage, accessibility and reliable traceability for the records kept.

(A)1.VI: The information on nationality is required by ICAO Annex 1, 5.1.1.

Details. Should the licence format propose deviations from ICAO Annex 1 the differences should be filled.

(A)1.IX: Part A of the commented Appendix consists a list of the items that require to appear on the licence. Furthermore, the subject information is in accordance with ICAO Annex 1 requirements, 5.1.1. Details.

(B): The provision is removed.

(C): With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment

33

comment by: skyguide Corporate Regulation Management

Appendix 1 Cover page

The size of each page shall be one eighth A4.

It would be far more convenient to use a standard credit card size for the licence as then it will fit into the ATCO's wallet and would be compatible with the concept of electronic licences being integrated onto a badge or access card.

~~This licence complies with the ICAO standards~~

As we will surely have some deviations (be they harmonised across Europe or not), does this mean that the licence complies with ICAO standards? After how many deviations does the licence no longer comply with ICAO standards? Suggest to delete this.

~~'European Union' to be deleted for non-EU Member States EUROPEAN UNION'~~

~~(English only)~~As any person and organisation complying with the regulation is complying with the regulation whether they are members of the EU or not, the licence should be linked to the regulation and not state EU or not.

response

Partially accepted

- With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to

facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller him/herself.

- One of the Agency's objectives, as set up by the legislator, is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. Furthermore, community essential requirements and rules for their implementation should ensure that Member States fulfil the obligations created by the Chicago Convention. Taking into account these principles, the licence template would be issued as a result of the licencing process verifying compliance with the applicable requirements which are aligned with ICAO standards. Considering these principles, the proposal is not accepted.

- The issue of the licence is a result of licencing process confirming that the applicant meets the requirements of the subject Regulation which is reflected on the cover page of the licence stating 'issued in accordance with Commission Regulation (EU) No .../...'. Furthermore, the text 'European Union to be deleted for non EU Member States' is part of the pages referring to the instructions on how the (Student)ATCO licence has to be filled in by the competent authority. This instruction is not part of the official document that will be hold by the air traffic controller.

comment

34

comment by: skyguide Corporate Regulation Management

Appendix 1 (IXa) Privileges

the date of successful completion of the ~~initial~~ training relevant to that rating and/or rating endorsement

PAR and SRA are, for example trained in unit training and not initial training.

Privileges OJTI, STDI and assessor

There is no expiry date or provision for revalidation in this part of the template.

Appendix 1 XIII and IXa

remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency.

As a licence endorsement, language proficiency should be in the same place as OJTI, STDI, assessor endorsements (i.e. IXa)

Appendix 1 (IX) Validity

The privileges of the licence shall be exercised only if the holder has a valid medical certificate ~~for the required privilege~~, except when only STDI privileges are exercised.

We suggest simplifying the sentence as it contains a double requirement of the same thing. This is a double requirement stating the same thing. Suggest to simplify.

~~Validity: The privileges of the licence shall be exercised only if the holder has a valid medical certificate for the required privilege, except when only STDI privileges are exercised.~~

...

~~A legal identification document containing a photo shall be carried for the purposes of identification of the licence holder~~

The explanation of the validity does not refer to the validity of the licence and does not bring any added value. We do not see what should be written in this part of the licence.

Appendix 1 XIII and XII language proficiency endorsement(s), level and validity date shall be included. Expiry date.

For the language proficiency, the term validity date is used and for rating endorsements, the term expiry date is used. As they mean the same thing, it is suggested that we use one or the other, but not 2 different terms.

response *Partially accepted*

IXa: The Agency takes consideration of the comment.

The 'initial' is removed as proposed.

The requirements, including the privileges and revalidation of the OJTI, STDI and assessor endorsement, are completely reconsidered and redrafted. As a consequence, only the expiry date necessitates to be mirrored in the template.

XIII and IXa: One of the Agency's objectives, as set up by the legislator, is to assist Member States in fulfilling their obligations under the Chicago Convention by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.

IX Validity: The Agency takes consideration of the proposal and the text is amended.

XIII and XII: The Agency takes note of the proposal and 'validity date' is replaced by 'expiry date'.

comment 35

comment by: *skyguide Corporate Regulation Management*

Page 6 Abbreviations used in this licence

Suggest to remove.

Comment: The abbreviations should be standard in view of the drive towards harmonisation and are defined in the regulation itself. It then makes no sense to have a whole page dedicated to them.

response *Not accepted*

The Agency takes note of the comment. However, towards harmonisation the abbreviations used for the purpose of licence issue will be integrated as part of the format in order any deviations to be avoided.

comment 37

comment by: *Maastricht UAC*

Appendix 1 (c) Format for licences	Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence	Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used. and the items mentioned under point (a) must appear clearly thereon For paper licences, the items mentioned under point (a) must appear thereon. For plastic cards and electronic devices, the items I to IV and VII must appear thereon.
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response *Not accepted*

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any

alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 38

comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
Appendix 1 (c) Format for licences	Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence	Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used. and the items mentioned under point (a) must appear clearly thereon For paper licences, the items mentioned under point (a) must appear thereon. For plastic cards and electronic devices, the items I to IV and VII must appear thereon.

response *Not accepted*

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment

40

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
APPENDIX 1 TO COMMISSION Regulation (EU) No .../... Format for licences AIR TRAFFIC CONTROLLER LICENCE	<p>B) The licence shall be accompanied by a valid medical certificate, except when only STDI privileges are exercised.</p> <p>IXb Validity: The privileges of the licence unit endorsement shall be exercised only if the holder has a valid medical certificate for the required privilege except when only STDI privileges are exercised.</p> <p>...</p> <p>A legal identification document containing a photo shall be carried for the purposes of identification of the licence holder.</p>	<p>ATCO.C.001 considers the licence a qualification for theoretical training. It should also be noted that no medical certificate is needed, neither for that or for delivering any other training other than OJT. Therefore, the best considered solution is the proposed change in the text.</p>
APPENDIX 1 TO COMMISSION Regulation (EU) No .../... Format for licences AIR TRAFFIC CONTROLLER LICENCE	<p>IXa Requirements: English and any language(s) determined by the competent authority. The date of first issue of a rating and/or rating endorsement shall be the date of successful completion of the initial training relevant to that</p>	<p>Rating endorsements can also be acquired during unit training. Therefore the proposed change in the text seems to be suitable.</p>

	rating and/or endorsement.	rating
	Signature/stamp of the authority or licence number and signature of authorized the assessor	Important to remark that the assessor needs to be authorized by the competent authority to revalidate the unit endorsement. ATCO.AR.D.001 1.

response *Partially accepted*

IXb Validity: The Agency takes note of the comment. Item IXb is moved as note to IX. The text is amended as follows:
 ` * The privileges of the licence shall be exercised only if the holder has a valid medical certificate, except for the STDI and assessor endorsements.'
 IXa: The comment is accepted.
 The Agency takes note of the remark which is reflected in ATCO.AR.D.001 (a).

comment 42 comment by: *CANSO Civil Air Navigation Services Organization*

With regards to Appendix 1 (A) 1.3, CANSO considers that it would be better not to introduce new abbreviations that do not figure anywhere else in the regulation. Propose to use (Student) ATCO instead of (ST)ATCOL as follows in the text:
serial number of the licence with the United Nations (UN) country code of the State of licence issue and followed by ~~'(ST)ATCOL'~~ (Student) ATCO licence and a code of numbers and/or letters in Arabic numerals and in Latin script

response *Accepted*

comment 43 comment by: *CANSO Civil Air Navigation Services Organization*

CANSO proposes the following change to Appendix 1 (C):
Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used and the items mentioned under point (a) must appear clearly thereon and items I to IV and VII must appear thereon
 Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence

response *Not accepted*

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 44

comment by: *CANSO Civil Air Navigation Services Organization*

With regards to the cover page of licence in Appendix 1, CANSO considers that the size of each page should be one eighth A4. This is bigger than the standard credit card size. For convenience, using standard credit card size would allow the licence holder to have the licence in their wallet.

response *Not accepted*

The Agency takes note of the comment. In point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 45

comment by: *CANSO Civil Air Navigation Services Organization*

	<p>CANSO has 2 comments with regards to Appendix 1 (IX a) privileges:</p> <ul style="list-style-type: none"> - CANSO proposes the following change: <i>the date of successful completion of the initial training relevant to that rating and/or rating endorsement</i> <p>Rating endorsements are not necessarily trained in initial training. They may also be trained in unit training (e.g. PAR, SRA)</p> <ul style="list-style-type: none"> -CANSO considers that there needs to be an expiry date and provision for revalidation with regards to the '<i>Privileges OJTI, STDI and assessor</i>' .
response	<p><i>Accepted</i></p> <ul style="list-style-type: none"> - The Agency takes consideration of the first comment and the text is amended accordingly. - The Agency takes consideration of the second comment. The requirements, including the privileges and revalidation of the OJTI, STDI and assessor endorsement are completely reconsidered and redrafted. As a consequence, only the expiry date necessitates to be mirrored in the template.
comment	<p>46 comment by: <i>CANSO Civil Air Navigation Services Organization</i></p> <p>CANSO proposes the following change to the Appendix 1 (IXb) Validity: <i>The privileges of the licence shall be exercised only if the holder has a valid medical certificate for the required privilege, except when only STDI privileges are exercised</i> This is a double requirement stating the same thing. Suggest to simplify</p>
response	<p><i>Accepted</i></p> <p>The Agency takes consideration of the proposal. The text is amended and results as follows: '<i>The privileges of the licence shall be exercised only if the holder has a valid medical certificate, except for the STDI and assessor endorsements.</i>'</p>
comment	<p>47 comment by: <i>CANSO Civil Air Navigation Services Organization</i></p> <p>With regards to Appendix 1 (A), 2 (XIII) {and IXa}, CANSO considers that language proficiency is a licence endorsement and should be moved to the same place as OJTI, STDI, assessor endorsements (i.e. IXa).</p>
response	<p><i>Not accepted</i></p> <p>One of the Agency's objective as set up by the legislator is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the</p>

differences.

comment	48	comment by: <i>CANSO Civil Air Navigation Services Organization</i>
	<p>With regards to Appendix 1 page 4 of the cover page point XIII {and page 5, point XIIb}, for rating endorsements, the term expiry date is used, and for the language proficiency, the term validity date is used. They mean the same thing, so it is suggested that we use one or the other, but not 2 different terms.</p>	
response	<p><i>Accepted</i></p> <p>The term used is 'expiry date'.</p>	

comment	49	comment by: <i>swissatca</i>
	<p>We strongly suggest to use a standard credit card format for the licence that would be compatible with the concept of electronic licences being integrated onto a badge or access card. And also for the medical certificate.</p>	
response	<p><i>Not accepted</i></p> <p>With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue. Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.</p>	

comment

50

comment by: *swissatca*

This statement goes against the free movement of people (which can be achieved through bilateral agreements) and the recognition of the licence. Any person and organisation complying with the regulation is de facto complying with the regulation whether they are members of the EU or not, the licence should be linked to the regulation and not state EU or not.

~~'European Union' to be deleted for non-EU Member States~~

~~EUROPEAN UNION~~

~~(English only)~~

Needs to be amended for the medical certificate as well.

response

Accepted

The issue of the licence is a result of licencing process confirming that the applicant meets the requirements of the subject regulation which is reflected on the cover page of the licence stating 'issued in accordance with Commission Regulation (EU) No .../...'. Furthermore, the text 'European Union to be deleted for non EU Member States' is part of the pages referring to the instructions on how the (Student) ATCO licence has to be filled in by the competent authority. This instruction is not part of the official document that will be hold by the air traffic controller.

comment

53

comment by: *Civil Aviation Authority Norway***A**

1-III: Should not introduce new abbreviations that do not figure anywhere else in the regulation. Propose to use

<State> + ATCO + code of numbers and not (ST) ATCOL.

Title of licence in **1-II** in plain language («Student Air Traffic Controller Licence»).

1-IX: What is the reason for the first issue date on each rating and endorsements (privileges)?

No value of logging historical data on the licence itself.

Suggest to replace this with data that is of importance for the CA (competent authority):

-State and date of first issued licence (in State 1)

-State and date of first issued licence (in State 2)

This will give CA the source of information if a background check is needed since a common EASA database does not exist.

C:«Other suitable storage tools» - plastic cards or electronic devices - problem to store all items in A e.g on a plastic card that is normally of a smaller size. Suggest that only the items required to identify the person as a licence holder, the type of licence, the date of first issue (in this state) and the issuing state is the only mandatory items on an electronic licence. All the other information can be stored electronically in the licence, which should be credit card size.

Other comments: If removing privilege information on electronic devices, both the licence holder and service provider must have access to a database where the privilege information is stored.

Medical licence could be integrated in an electronic ATCO licence if the administrative arrangements at the Competent Authority support this.

response *Partially accepted*

A: The Agency takes consideration of the comment on abbreviation and the text is amended with (STUDENT) AIR TRAFFIC CONTROLLER LICENCE in Item II and (Student) ATCO licence in Item III.

IX: The date of first issue of ratings and endorsements is required for the purpose of traceability, whether an air traffic controller with rating and endorsement did not commence or interrupted exercising the privileges associated with those privileges.

C: With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 57

comment by: *HungaroControl*

APPENDIX 1 FORMAT FOR LICENCES AIR TRAFFIC CONTROLLER LICENCE (A).1.3:

serial number of the licence with the United Nations (UN) country code of the State of licence issue and followed by '(ST)ATCOL' **(Student) ATCO licence** and a code of numbers and/or letters in Arabic numerals and in Latin script
We propose to use (Student) ATCO licence instead of (ST)ATCOL.

response *Accepted*

comment 58

comment by: *HungaroControl*

Appendix 1 (C):

Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used ~~and the items mentioned under point~~

	<p>(a) must appear clearly thereon and items I to IV and VII must appear thereon</p> <p>Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence.</p>
response	<p><i>Not accepted</i></p> <p>With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.</p> <p>The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.</p> <p>Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.</p>
comment	<p>59 comment by: <i>HungaroControl</i></p> <p>Appendix 1 Cover page of licence: The size of each page shall be one eighth A4. For convenience we propose to use a credit card size licence.</p>
response	<p><i>Not accepted</i></p> <p>The Agency takes note of the comment. In point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the</p>

licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 60 comment by: HungaroControl

Appendix 1 (IXa) Privileges:

the date of successful completion of the initial training relevant to that rating and/or rating endorsement

Rating endorsements are not necessarily trained in initial training. They may also be trained in unit training (e.g. PAR, SRA)

response Accepted

comment 61 comment by: HungaroControl

Appendix 1 (IXa) Privileges:

Privileges OJTI, STDI and assessor

There needs to be an expiry date and provision for revalidation.

response Accepted

The Agency takes consideration of the comment. The requirements, including the privileges and revalidation of the OJTI, STDI and assessor endorsement are completely reconsidered and redrafted. As a consequence, only the expiry date necessitates to be mirrored in the template.

comment 62 comment by: HungaroControl

Appendix 1 (IXb) Validity:

The privileges of the licence shall be exercised only if the holder has a valid medical certificate for the required privilege, except when only STDI privileges are exercised.

Simplification is needed as it is a double requirement.

response Accepted

The Agency takes consideration of the proposal. The text is amended and results as follows:

'The privileges of the licence shall be exercised only if the holder has a valid medical certificate, except for the STDI and assessor endorsements.'

comment 63 comment by: HungaroControl

IXa:

remarks: i.e. special endorsements relating to limitations and endorsements for

	<p>privileges, including endorsements of language proficiency If language proficiency is a licence endorsement it should be moved to the same place as OJT, STDI, assessor endorsements (i.e. IXa).</p>
response	<p><i>Not accepted</i></p> <p>One of the Agency's objectives, as set up by the legislator, is to assist Member States in fulfilling their obligations under the Chicago Convention by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.</p>
comment	<p>64 comment by: HungaroControl</p> <p>XIII: remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency If language proficiency is a licence endorsement it should be moved to the same place as OJT, STDI, assessor endorsements (i.e. IXa).</p>
response	<p><i>Not accepted</i></p> <p>One of the Agency's objectives, as set up by the legislator, is to assist Member States in fulfilling their obligations under the Chicago Convention by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.</p>
comment	<p>65 comment by: HungaroControl</p> <p>Appendix 1 XIII: Language proficiency endorsement(s), level and validity date shall be included. Expiry date Different wording is used for the expiry date (expiry date for rating endorsement and validity date for language). Expiry date should be used in both cases.</p>
response	<p><i>Accepted</i></p>

comment	66	comment by: <i>HungaroControl</i>
	<p>XII b: Language proficiency endorsement(s), level and validity date shall be included. Expiry date Different wording is used for the expiry date (expiry date for rating endorsement and validity date for language). Expiry date should be used in both cases.</p>	
response	<i>Accepted</i>	

comment	68	comment by: <i>Luca Valerio Falessi</i>
	<p>NPA 2012-18 (B.III) Appendix 1 Item IXa</p> <p>Assessor endorsement CAS</p> <p>Using an acronym instead of "Assessor endorsement" (i.e. CAS) is much better.</p>	
response	<p><i>Noted</i></p> <p>The Agency takes note of the proposal. The Agency would welcome any further proposals for abbreviation of assessor having in mind that the assessor assesses practical skills.</p>	

comment	86	comment by: <i>EUROCONTROL</i>
	<p>There should be the possibility to move to electronically kept licences, which are simple electronic card (like a driving licence or ID card) with a chip, which would simplify the admin and the tracking of mobility and existence and validity of certificates, ratings and endorsements.</p>	
response	<p><i>Not accepted</i></p> <p>With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.</p> <p>The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.</p> <p>Moreover, in point (A) of the commented Appendix it is provided that items I to</p>	

XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment

91

comment by: NATS National Air Traffic Services Limited

APPENDIX 1 FORMAT FOR LICENCES AIR TRAFFIC CONTROLLER LICENCE (A).1.3

It would be better not to introduce new abbreviations that do not figure anywhere else in the regulation. Propose to use (Student) ATCO instead of (ST)ATCOL

Suggested resolution - serial number of the licence with the United Nations (UN) country code of the State of licence issue and followed by (Student) ATCO licence and a code of numbers and/or letters in Arabic numerals and in Latin script

response

Accepted

The Agency takes consideration of the comment and the text has been amended.

comment

92

comment by: NATS National Air Traffic Services Limited

Appendix 1 (C)

Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence

Suggested resolution: Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used and items I to IV and VII must appear thereon

response

Not accepted

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where

the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 93 comment by: *NATS National Air Traffic Services Limited*

Appendix 1 Cover page of licence

This is bigger than the standard credit card size. For convenience, using standard credit card size would allow the licence holder to have the licence in their wallet.

We recommend that there is no specification of licence size.

response *Not accepted*

The Agency takes note of the comment. In point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 94 comment by: *NATS National Air Traffic Services Limited*

Appendix 1 (IXa) Privileges

Rating endorsements are not necessarily trained in initial training. They may also be trained in unit training (e.g. PAR, SRA)

We recommend that the text requires the date of successful completion of the training relevant to that rating and/or rating endorsement

response *Accepted*

comment	95	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>Appendix 1 (IXa) Privileges There needs to be an expiry date and provision for revalidation.</p>	
response	<p><i>Accepted</i></p> <p>The Agency takes consideration of the comment. The requirements, including the privileges and revalidation of the OJTI, STDI and assessor endorsement are completely reconsidered and redrafted. As a consequence, only the expiry date necessitates to be mirrored in the template.</p>	
comment	96	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>Appendix 1 (IXb) Validity This is a double requirement stating the same thing. Suggest to simplify The privileges of the licence shall be exercised only if the holder has a valid medical certificate except when only STDI privileges are exercised</p>	
response	<p><i>Accepted</i></p> <p>The Agency takes consideration of the proposal. The text is amended and results as follows: 'The privileges of the licence shall be exercised only if the holder has a valid medical certificate, except for the STDI and assessor endorsements.'</p>	
comment	97	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>Appendix 1 XIII Language proficiency is a licence endorsement and should be moved to the same place as OJTI, STDI, assessor endorsements (i.e. IXa). remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency</p>	
response	<p><i>Not accepted</i></p> <p>One of the Agency's objective as set up by the legislator is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.</p>	

comment	98	comment by: NATS National Air Traffic Services Limited
	<p>Appendix 1 XIII and XII b For rating endorsements, the term expiry date is used, and for the language proficiency, the term validity date is used. They mean the same thing, so it is suggested that we use one or the other, but not 2 different terms. Language proficiency endorsement(s), level and validity date shall be included. Expiry date</p>	
response	<p><i>Accepted</i></p> <p>The Agency takes consideration of the comment and the text is amended as follows: 'Language proficiency endorsement(s): [language(s)/level/expiry date]'</p>	
comment	99	comment by: ENAV
	<p>APPENDIX 1 FORMAT FOR LICENCES AIR TRAFFIC CONTROLLER LICENCE (A).1.3 serial number of the licence with the United Nations (UN) country code of the State of licence issue and followed by '(ST)ATCOL' (Student) ATCO licence and a code of numbers and/or letters in Arabic numerals and in Latin script Comment: It would be better not to introduce new abbreviations that do not figure anywhere else in the regulation. Propose to use (Student) ATCO instead of (ST)ATCOL</p>	
response	<p><i>Accepted</i></p>	
comment	100	comment by: ENAV
	<p>Appendix 1 (C) Material. First quality paper and/or other suitable storage tools, including plastic cards or electronic devices shall be used and the items mentioned under point (a) must appear clearly thereon and items I to IV and VII must appear thereon</p> <p>Comment: Requiring all items in (A) to appear on an electronic licence defeats the purpose as it will have to either be big enough to accommodate all the information or written too small. Suggest that only the items required to identify the person as a licence holder and the issuing state be mandatory on an electronic licence. All the other information can be stored electronically in the licence</p>	
response	<p><i>Not accepted</i></p> <p>With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences. The licence format proposed is developed in line with the Specifications for</p>	

personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 101

comment by: ENAV

Appendix 1 Cover page of licence

The size of each page shall be one eighth A4.

Comment: This is bigger than the standard credit card size. For convenience, using standard credit card size would allow the licence holder to have the licence in their wallet

response Not accepted

The Agency takes note of the comment. In point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment 102

comment by: ENAV

Appendix 1 (IXa) Privileges

the date of successful completion of the initial training relevant to that rating and/or rating endorsement

Comment: Rating endorsements are not necessarily trained in initial training. They may also be trained in unit training (e.g. PAR, SRA)

response	Accepted	
comment	103	comment by: ENAV
	<p>Appendix 1 (IXb) Validity</p> <p>The privileges of the licence shall be exercised only if the holder has a valid medical certificate for the required privilege, except when only STDI privileges are exercised</p> <p>Comment: This is a double requirement stating the same thing. Suggest to simplify</p>	
response	<p>Accepted</p> <p>The Agency takes consideration of the proposal. The text is amended and results as follows: 'The privileges of the licence shall be exercised only if the holder has a valid medical certificate, except for the STDI and assessor endorsements.'</p>	
comment	104	comment by: ENAV
	<p>Appendix 1 XIII And IXa</p> <p>remarks: i.e. special endorsements relating to limitations and endorsements for privileges, including endorsements of language proficiency</p> <p>Comment: Language proficiency is a licence endorsement and should be moved to the same place as OJTI, STDI, assessor endorsements (i.e. IXa).</p>	
response	<p>Not accepted</p> <p>One of the Agency's objective as set up by the legislator is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.</p>	
comment	105	comment by: ENAV
	<p>Appendix 1 XIII and XII b</p> <p>Language proficiency endorsement(s), level and validity date shall be included. Expiry date</p> <p>Comment: For rating endorsements, the term expiry date is used, and for the language proficiency, the term validity date is used. They mean the same thing,</p>	

	so it is suggested that we use one or the other, but not 2 different terms. Preferred
response	<p><i>Accepted</i></p> <p>The Agency takes consideration of the comment and the text is amended as follows: 'Language proficiency endorsement(s): [language(s)/level/expiry date]'</p>
comment	<p>106 comment by: <i>Federal Office of Civil Aviation FOCA</i></p>
	<p>Article: appendix 1 A Comment / Issue / Suggestion: Content. The item number as defined in point 1 and 2 below shall always be printed in association with the item heading. Items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form as prescribed below. Any separate or detachable part shall be clearly identifiable as part of the licence. Justification: Item header unclear. Provide definition or explanation.</p>
response	<p><i>Noted</i></p> <p>Item heading is the title of an item, e.g. name of the holder in full, signature of officer issuing the licence and date of issue, etc.</p>
comment	<p>107 comment by: <i>Federal Office of Civil Aviation FOCA</i></p>
	<p>Article: appendix 1 A 1.3 Comment / Issue / Suggestion: UN code suggest delete Justification: brings no added value as the licence is identified by item I and will be exchanged in cases of moving to different country</p>
response	<p><i>Not accepted</i></p> <p>The Agency takes note of the comment. The proposal on deletion of the UN code is not accepted as it is required by ICAO Annex I, 5.1.1. Details. Should the licence format deviate from ICAO Annex 1, the differences should be filled.</p>
comment	<p>108 comment by: <i>Federal Office of Civil Aviation FOCA</i></p>
	<p>Article:</p>

	<p>appendix 1 A 1.3 Comment / Issue / Suggestion: ATCOL STATCOL. Suggest delete. Justification: these are new abbreviations that bring no added value</p>
response	<p><i>Accepted</i></p> <p>The Agency takes note of the comment. The title of the licence is amended as '(STUDENT) AIR TRAFFIC CONTROLLER LICENCE'.</p>

comment	<p>109 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>Article: appendix 1 A 1.2 Comment / Issue / Suggestion: titel of the licence Justification: what is meant here? Provide explanation.</p>
response	<p><i>Noted</i></p> <p>The title of the licence is '(STUDENT) AIR TRAFFIC CONTROLLER LICENCE'.</p>

comment	<p>110 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>Article: appendix 1 A 1.6 Comment / Issue / Suggestion: nationality of holder. Suggest delete Justification: The nationality of the holder brings no added value for the reason of identification.</p>
response	<p><i>Not accepted</i></p> <p>The information on nationality is required by ICAO Annex I, 5.1.1. Details. Should the licence format deviate from ICAO Annex 1, the differences should be filled.</p>

comment	<p>111 comment by: <i>Federal Office of Civil Aviation FOCA</i></p> <p>Article: appendix 1 A 1.9 Comment / Issue / Suggestion: certification of validity and authorisation for the privileges granted, including the dates when they were first issued; suggest delete</p>
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	<p>Justification: unclear. To what does it refer to? It brings no added value to have the date of first issue on the licence. It only becomes relevant in case of additional licence endorsements e.g. OJTI</p>
response	<p><i>Not accepted</i></p> <p>The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1, especially Chapter 5, 5.1.1.2, point IX. Should the licence propose deviations from ICAO Annex I, the differences should be filled. It is shown as point IX of the licence where the privileges of the rating(s) and endorsement(s) are indicated for which the licence holder is entitled to exercise.</p>
comment	<p>112 comment by: <i>Federal Office of Civil Aviation FOCA</i></p>
response	<p>Article: appendix 1 A 2.12 Comment / Issue / Suggestion: suggest delete. Justification: R/T provisions are new with regards to stating them in the licence beside the LPR and bring no added value as they are part of initial training.</p> <p><i>Accepted</i></p> <p>The Agency agrees that there is no need to display R/T privileges on the air traffic controller licence, since the existence of an R/T licence is not a prerequisite for the exercise of the air traffic controller privileges. Should it be a requirements at national level, Member States are free to require, by other means, that air traffic controllers are in possession of an R/T licence.</p>
comment	<p>113 comment by: <i>Federal Office of Civil Aviation FOCA</i></p>
response	<p>Article: appendix 1 A 2.13 Comment / Issue / Suggestion: LPR should be part of endorsements as stated in 2.12 Justification: change.</p> <p><i>Not accepted</i></p> <p>One of the Agency's objective as set up by the legislator is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. Item XIII remarks should include special endorsements relating to limitations and endorsements for</p>

privileges, including from 5 March 2008 an endorsement of language proficiency, and other information required in pursuance to Article 39 of the Chicago Convention. Changing the requirements would require filling the differences.

comment

114

comment by: *Federal Office of Civil Aviation FOCA*

Article:

appendix 1 B

Comment / Issue / Suggestion:

The possibility of having a photograph of the licence holder should be introduced. In this case the need to have a legal identification document should be deleted.

Justification:

In the light of moving to electronic licences the information contained in (A) should be limited to the part necessary for the identification of the person. All other information should either be stored in the licence electronically or be depicted on the reverse of the licence.

response

Not accepted

The provision has been removed.

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. During rule development the rulemaking group experts advised the Agency a provision to be included for identification of the licence holder. The most appropriate means acknowledged for that purpose was through a legal identification document containing a photo.

Furthermore, the Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

comment

115

comment by: *Federal Office of Civil Aviation FOCA*

Article:

licence template

Comment / Issue / Suggestion:

licence cover. This does not allow for any other format, specifically credit card format in case of electronic licence.

Justification:

It makes sense for paper licences, somehow. Electronic licences in credit card format will have great difficulty to comply to this requirement. It is important to

response

define the relevant information needed to be stated on a licence/certificate. It should, however, remain in the competence of the competent authority to define the layout of such documents as long as the information contained fulfills the requirements of this regulation.

Not accepted

With the increasing mobility of the air traffic controllers, one of the principles applied during the rule development was the principle of 'one licence'. To support this approach a common format for the licence is proposed in order to facilitate (e.g.) the mutual recognition of the licences.

The licence format proposed is developed in line with the Specifications for personnel licences as required by ICAO Annex 1. The Agency considers that moving towards common European electronic licence would necessitate more thorough discussion at EU level as it should be facilitated by a database where the privileges are stored and maintained, including the necessary software, sharing of information and personal data between Member States. Therefore, as such database is not included to the scope of this NPA, the Agency can only take note of this proposal. The commentator is kindly invited to consider a more detailed rulemaking proposal on the issue.

Moreover, in point (A) of the commented Appendix it is provided that items I to XI are the 'permanent' items, and items XII to XIV are the 'variable' items which may appear on a separate or detachable part of the main form. The permanent items duplicate the requirements of Commission Regulation (EU) No 805/2011. The means to display the required information is left to the competent authorities, either on first quality paper and/or other suitable material, including plastic cards which would prevent or readily show any alterations or erasures. Any entries or deletions to the form should be clearly authorised by the competent authority. Having in mind the required information to be displayed, credit card size of the licence would be not 'user-friendly', neither for the authority nor for the air traffic controller itself.

comment

116

comment by: *Federal Office of Civil Aviation FOCA*

Article:

licence template

Comment / Issue / Suggestion:

ICAO compliance

Justification:

It is up to each individual state to comply with ICAO regulation or to put in deviations. Should such deviations then be depicted on the licence?

response

Noted

The Agency take note of the comment. However, it should be pointed out that one of the Agency's objective as set up by the legislator is to assist Member States in fulfilling their obligations under the Chicago Convention, by providing a basis for a common interpretation and uniform implementation of its provisions, and by ensuring that its provisions are duly taken into account. Furthermore community essential requirements and rules for their implementation should ensure that Member States fulfil the obligations created by the Chicago Convention. Taking into account these principles, the licence template would be issued as a result of the licencing process confirming that

the air traffic controller complies with the applicable requirements which are aligned with ICAO standards.

comment

117

comment by: *Federal Office of Civil Aviation FOCA*

Article:

licence template

Comment / Issue / Suggestion:

'European Union' to be deleted for non-EU Member States. Suggest delete

Justification:

It makes no sense to write this here as not all states fulfilling the regulation are EU- Memberstates. Switzerland will issue a licence according to this regulation. Therefore the reference should be made to the regulation and not to the membership of the EU.

response

Accepted

The issue of the licence is a result of licencing process confirming that the applicant meets the requirements of the subject Regulation which is reflected on the Cover page of the licence stating 'issued in accordance with Commission Regulation (EU) No .../...'. Furthermore, the text 'European Union to be deleted for non EU Member States' is part of the pages referring to the instructions on how the (Student)ATCO licence has to be filled in by the competent authority. This instruction is not part of the official document that will be hold by the air traffic controller.

comment

118

comment by: *Federal Office of Civil Aviation FOCA*

Article:

licence template

Comment / Issue / Suggestion:

Page 6 abbreviations. Suggest delete.

Justification:

The abbreviations are stated in the regulation and do not need to be duplicated here. Furthermore these abbreviations are known in ATM.

response

Not accepted

The Agency takes note of the comment. However the abbreviations used for the purpose of Licence issue will be intergated as part of the format in order any deviations to be avoided.

APPENDIX 2 — LANGUAGE PROFICIENCY RATING SCALE — REQUIREMENTS FOR PROFICIENCY IN LANGUAGES

p. 11-12

comment	39	comment by: UK CAA
	<p>Page No: 11 and 12 Paragraph No: Appendix 2 Comment: This table is barely legible unless under high magnification. In print form it cannot be read. Proposed Text: Replace with more legible table.</p>	
response	Accepted	

comment	72	comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)
	<ul style="list-style-type: none"> · Appendix 1 – format for licences: page 3; the date of first issue should be the date when the unit training was successfully completed for ATCO. · Appendix 1 – format for licences: page 3; the competent authority should be able to see in the licence what privileges the assessor has; e.g. is she/he allowed to assess assessors/OJTI/STDI. · Appendix 1 – format for licences: the licence template needs to be re-evaluated as there are discrepancies in it, especially at page 3. · Appendix 1 – format for licences: page 6; the abbreviations to be used should be already stated in the template to avoid usage of national variations. 	
response	<p>Accepted</p> <ul style="list-style-type: none"> - The Agency takes note of the comment and text is revised as follows: 'The date of first issue of a rating and/or rating endorsement shall be the date of successful completion of the training relevant to that rating and/or rating endorsement.' - The Agency takes consideration of the comment. The requirements, including the privileges and revalidation of the OJTI, STDI and assessor endorsement are completely reconsidered and redrafted. As a consequence, the space left in the licence indicating the privileges would allow such insertion. However, to assess OJTI or STDI or another assessor the subject assessor needs to have the corresponding privilege and the required experience which could normally be read out of the other privileges. - The Agency takes note of the comment. Page 3 has been completely redrafted. - The Agency agrees with the proposal and towards harmonisations the abbreviation has been amended accordingly. 	

APPENDIX 3 – BASIC TRAINING (Reference Annex I – PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1))	p. 13-14
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comment	69	comment by: Luca Valerio Falessi
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**NPA 2012-18 (B.III)
Appendix 1 Item XIIa**

~~Radiotelephony privileges~~

~~Radio telephony (R/T) privileges may appear on the licence form or on a separate certificate, if required~~

~~Language proficiency:~~

~~[language(s)/level/validity date]~~

~~All additional licensing information to be entered here.~~

~~Language proficiency endorsement(s), level and validity date shall be included.~~

No definition of *Radiotelephony privileges* is available.

Appendix 1 Item XIII

Remarks:

~~Language proficiency:~~

~~[language(s)/level/validity date]~~

~~All additional licensing information to be entered here.~~

~~Language proficiency endorsement(s), level and validity date shall be included.~~

Move language proficiency to **Item XIIa**

response *Partially accepted*

The reference to R/T privileges is deleted, since the existence of an R/T licence is not a prerequisite for the exercise of the air traffic controller privileges.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 1: INTRODUCTION TO THE COURSE

p. 15

comment 29

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

~~The subject objective is:~~

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 2: AVIATION LAW

p. 16

comment *1*

comment by: ACCCT TF

Subject 2: AVIATION LAW

The subject objective is:

Learners shall apply the regulations governing rules of the air, airspace and flight planning and explain their development ~~and~~ or where applicable incorporation into national legislation.

TOPIC LAWB 1 — INTRODUCTION TO AVIATION LAW

Subtopic LAWB 1.1 — Relevance of aviation law ~~National and international organisations~~

TOPIC LAWB 2 INTERNATIONAL ORGANISATIONS

Subtopic LAWB 2.1 — ICAO

Subtopic LAWB 2.2 — European and other agencies

Subtopic LAWB 2.3 — Aviation associations

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~

~~TOPIC INTRB 1 — COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment 30

comment by: *European HF Advisory group*

Page 16

Topic LAWB 4 Safety and Safety Culture

[The title says Safety and Safety Culture but the module content addresses what in safety theory are called the Safety Roles \(Safety Regulation and Safety Management\).](#)

response *Partially accepted*

The content of the Topic LAWB 4 has been reviewed and updated by the ACCCT Task Force, on request of the Agency. The results of this exercise are shown in Comment #11 to B.V. However, to further update the content of training objectives on this topic the Agency in AMC1 to Appendix 3 has replaced the Training objectives LAWB 4.2.1 with the two following Training objectives:

- LAWB 4.2.1 - Explain the regulatory requirements of Safety Management System in ATM'; and
- LAWB 4.2.2 - 'Explain the principles of safety management system'

both these new training objectives have taxonomy level 2 and have as mandatory content Commission Regulation (EU) No 1035/2011.

comment 2

comment by: ACCCT TF

TOPIC ATMB 7 SEPARATIONS

Subtopic ATMB 7.1 — Vertical separation and procedures

Subtopic ATMB 7.2 — Horizontal separation and procedures

Subtopic ATMB 7.3 — Visual separation

Subtopic ATMB 7.4 — ~~Wake turbulence separation~~ Aerodrome separation and proceduresSubtopic ATMB 7.5 — ~~Aerodrome separation and procedures~~ Separation based on ATS surveillance systemsSubtopic ATMB 7.6 — ~~Separation based on ATS surveillance systems~~ Wake turbulence separation~~Subtopic ATMB 7.7 — Applied separation~~**TOPIC ATMB 9 PRACTICAL SKILLS**

Subtopic ATMB 9.1 — Traffic management process

Subtopic ATMB 9.2 — Practical skills applicable to all ratings

Subtopic ATMB 9.3 — Practical skills applicable to aerodrome

Subtopic ATMB 9.4 — Practical skills applicable to surveillance

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1 —~~

~~COURSE MANAGEMENT~~~~Subtopic INTRB 1.1 — Course introduction~~~~Subtopic INTRB 1.2 — Course administration~~~~Subtopic INTRB 1.3 — Study material and training documentation~~~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

response *Partially accepted*

Subtopic INTRB 2.1 — Course content and organisation
 Subtopic INTRB 2.2 — Training ethos
 Subtopic INTRB 2.3 — Assessment process
 TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE
 Subtopic INTRB 3.1 — Job prospects

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

81

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

• ADI (TWR), ADV, APP and/or APS; subject 3 AIR TRAFFIC MANAGEMENT, Separation – We miss the subject "Reduction of separation minima in the vicinity of aerodromes" from Doc 4444 para. 6.1

response *Partially accepted*

The introduction of a topic or subtopic related to 'Reduction of separation minima in the vicinity of the aerodrome' is considered to be too detailed and demanding for Basic Training. In AMC1 to Appendix 3, training objective ATMB 7.4.2 named 'Aerodrome separations and procedures' indication ICAO Doc.4444 as mandatory content has been added.

D, Section 2, ATCO.D.010(a)(1)) — Subject 4: METEOROLOGY

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred

to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 5: NAVIGATION

p. 20

comment 3

comment by: ACCCT TF

TOPIC NAVB 5 INSTRUMENTAL NAVIGATION

Subtopic NAVB 5.1 — Ground-based systems

Subtopic NAVB 5.2 — Inertial navigation On-board systems

Subtopic NAVB 5.3 — Satellite-based systems

Subtopic NAVB 5.4 — Instrument approach procedures

TOPIC NAVB 6 PERFORMANCE BASED AREA NAVIGATION

Subtopic NAVB 6.1 — Principles and benefits of area navigation

Subtopic NAVB 6.2 — Introduction to PBN Types and techniques

Subtopic NAVB 6.3 — PBN applications New developments

TOPIC NAVB 7 PERFORMANCE BASED AREA NAVIGATION

Subtopic NAVB 7.1 — Future developments

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 6: AIRCRAFT

p. 21

comment 4

comment by: ACCCT TF

TOPIC ACFTB 3 AIRCRAFT CATEGORIES

Subtopic ACFTB 3.1 — Aircraft categories
 Subtopic ACFTB 3.2 — Wake turbulence categories
 Subtopic ACFTB 3.3 — ICAO approach categories
[Subtopic ACFTB 3.4 — Environmental categories](#)

TOPIC ACFTB 4 AIRCRAFT DATA

Subtopic ACFTB 4.1 — Recognition
 Subtopic ACFTB 4.2 — Performance data

TOPIC ACFTB 5 AIRCRAFT ENGINES

Subtopic ACFTB 5.1 — Piston engines
 Subtopic ACFTB 5.2 — Jet engines
 Subtopic ACFTB 5.3 — Turboprop engines
[Subtopic ACFTB 5.4 — Aviation fuels](#)

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1—**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction
 Subtopic INTRB 1.2 — Course administration
 Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation
 Subtopic INTRB 2.2 — Training ethos
 Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates and, taking, into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 7: HUMAN FACTORS

p. 22

comment 5

comment by: ACCCT TF

TOPIC HUMB 1 INTRODUCTION TO HUMAN FACTORS

Subtopic HUMB 1.1 — ~~Reference documents and~~ Learning techniques

Subtopic HUMB 1.2 — ~~Why~~ Relevance of human factors for ATC ?

Subtopic HUMB 1.3 — Human factors and ATC

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in

Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

52

comment by: IFATCA

74 BIII **Subject 7
Human
Factor**

This chapter seems to be outdated and only focussing at old views of Safety. A more forward looking approach to Safety is essential.

response

Noted

The training content proposed for consultation with this NPA is transposed from the EUROCONTROL Specification for the ATCO Common Core Content Initial Training edition 1.0 of 21/10/2008. As described in the Explanatory Note of the NPA, a complete review and update of the Common Core Content has been performed on request by EASA by EUROCONTROL and its ACCCT Task Force. The resulting amendments proposed by such review and update have been placed by EUROCONTROL as comments to the NPA.

In this context, the subject 'Human Factors' in all Appendixes and their related AMCs has been subject to a complete review, to keep it aligned with the progress of Human Factors theories and to establish a subject matter training content appropriate to the context of ATCO Initial Training.

In response to comments received during the NPA consultation, additional specific modifications to the content proposed by EUROCONTROL and the ACCCT TF are introduced, and the resulting text is available with this CRD.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 8: EQUIPMENT AND SYSTEMS

p. 23-24

comment

6

comment by: ACCCT TF

TOPIC EQPSB 2 RADIO

Subtopic EQPSB 2.1 — Radio theory

Subtopic EQPSB 2.2 — Radio communications

Subtopic EQPSB 2.3 — Direction finding

TOPIC EQPSB 3 ~~OTHER SYSTEMS AND~~ COMMUNICATIONS EQUIPMENT

Subtopic EQPSB 3.1 — Radio communications

Subtopic EQPSB 3.12 — Voice ATC communications between ATS units/positions

Subtopic EQPSB 3.3 — Data link Air-ground communications

Subtopic EQPSB 3.24 — Airline communications

TOPIC EQPSB 10 AUTOMATION IN ATS

Subtopic EQPSB 10.1 — Principles of automation

response

Accepted

Subtopic EQPSB 10.2 — Aeronautical fixed telecommunication network (AFTN)
 Subtopic EQPSB 10.3 — On-line data interchange
~~Subtopic EQPSB 10.4 — Closed circuit information system~~
 Subtopic EQPSB 10.5 4 — Systems used for the automatic dissemination of information

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and

justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 3 — BASIC TRAINING (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(1)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 25

comment 7

comment by: ACCCT TF

TOPIC PENB 2 AIRSPACE USERS

Subtopic PENB 2.1 — Civil aviation

Subtopic PENB 2.2 — Military ~~aviation~~

Subtopic PENB 2.3 — Expectations and requirements of pilots

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**~~

~~**COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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comment

74

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

• ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and

response	safety.
	<p><i>Partially accepted</i></p> <p>Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasising the need for appropriate consideration of environmental factors in the provision of ATS.</p>

APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 1: INTRODUCTION TO THE COURSE

p. 28

comment	<p>29 ❖</p> <p>comment by: ENAC-FRANCE</p> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topics from the IR to the AMC</p> <p><u>Example:</u> Subject 1: INTRODUCTION TO THE COURSE The subject objective is:</p> <div> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. TOPIC INTRB 1 — COURSE MANAGEMENT</p> <p>Subtopic INTRB 1.1 — Course introduction</p> <p>Subtopic INTRB 1.2 — Course administration</p> <p>Subtopic INTRB 1.3 — Study material and training documentation</p> <p>TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE</p> <p>Subtopic INTRB 2.1 — Course content and organisation</p> <p>Subtopic INTRB 2.2 — Training ethos</p> <p>Subtopic INTRB 2.3 — Assessment process</p> <p>TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE</p> <p>Subtopic INTRB 3.1 — Job prospects</p> </div>
response	<i>Partially accepted</i>

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 2: AVIATION LAW

p. 29

comment 8

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

**APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference
Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) —
Subject 3: AIR TRAFFIC MANAGEMENT**

p. 30-31

comment 9

comment by: ACCCT TF

**TOPIC ATM 1 PROVISION OF SERVICES ~~AIR TRAFFIC SERVICES AND
AIRSPACE MANAGEMENT~~**

Subtopic ATM 1.1 — Aerodrome control service
 Subtopic ATM 1.2 — Flight information service (FIS)
 Subtopic ATM 1.3 — Alerting service (ALRS)
 Subtopic ATM 1.4 — ATS system capacity and air traffic flow management

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TOPIC ATM 6 SEPARATIONS

Subtopic ATM 6.1 — Separation between departing aircraft
 Subtopic ATM 6.2 — Separation of landing aircraft and preceding landing or
 departing aircraft
 Subtopic ATM 6.3 — Tame based wake turbulence longitudinal separation
 S Subtopic ATM 6.4 — Reduced separation minima

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TOP TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

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T TOPIC ATM 10 PROVISION OF AN AERODROME CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility for the provision
 Subtopic ATM 10.2 — Functions of aerodrome control tower
 Subtopic ATM 10.3 — Traffic management process
 Subtopic ATM 10.3 4 — Aeronautical ground lights
 Subtopic ATM 10.4 5 — Information to aircraft by aerodrome control tower
 Subtopic ATM 10.5 6 — Control of aerodrome traffic
 Subtopic ATM 10.6 7 — Control of traffic in the traffic circuit
 Subtopic ATM 10.7 8 — Runway in use

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which

could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1 —~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

82

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

- ADI (TWR), ADV, APP and/or APS; subject 3 AIR TRAFFIC MANAGEMENT,

response

Separation – We miss the subject “Reduction of separation minima in the vicinity of aerodromes” from Doc 4444 para. 6.1

Not accepted

'Reduction of separation minima', including in the vicinity of an aerodrome, is not missing from ADV rating content. It is intended to be covered within subtopic ATM 6.4 'Reduced separation minima'. The related training objectives may be found in AMC1 to Appendix 4, indicating as mandatory content ICAO Doc 4444.

comment

89

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

· ADI (TWR) and ADV, subject 3, AIR TRAFFIC MANAGEMENT – We miss a subject dealing with “runway condition” and “braking action”.

response

Not accepted

'Runway condition' and 'braking action' is already covered in subtopics ATM 1.2 'Flight information service' and ATM 10.5 'Information to aircraft by aerodrome control tower', being the correspondent training objectives included in AMC1 to Appendix 4. The application of runway conditions and braking action is addressed in training objective ATM 10.7.4 in the aforementioned AMC.

APPENDIX 4 – AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I – PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) – Subject 4: METEOROLOGY

p. 32

comment

29 ❖

comment by: *ENAC-FRANCE*

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1**~~

COURSE MANAGEMENT~~Subtopic INTRB 1.1 — Course introduction~~~~Subtopic INTRB 1.2 — Course administration~~~~Subtopic INTRB 1.3 — Study material and training documentation~~~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~~~Subtopic INTRB 2.1 — Course content and organisation~~~~Subtopic INTRB 2.2 — Training ethos~~~~Subtopic INTRB 2.3 — Assessment process~~~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~~~Subtopic INTRB 3.1 — Job prospects~~response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 5: NAVIGATION

p. 33

comment 10

comment by: ACCCT TF

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TOPIC NAV 2 INSTRUMENT~~AL~~ NAVIGATION

Subtopic NAV 2.1 — Navigational systems

response	<div data-bbox="352 192 1455 264" data-label="Text"> <p>Subtopic NAV 2.2 — Stabilised approach</p> </div> <div data-bbox="352 264 1455 461" data-label="Text"> <p>Accepted</p> </div>
comment	<div data-bbox="352 528 1455 573" data-label="Text"> <p>29 ❖ comment by: ENAC-FRANCE</p> </div> <div data-bbox="352 618 1455 1514" data-label="Text"> <p><u>Comment:</u> If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary. <u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topics from the IR to the AMC <u>Example:</u> Subject 1: INTRODUCTION TO THE COURSE The subject objective is: <div data-bbox="352 1014 1455 1514" data-label="List-Group"> <ul style="list-style-type: none"> Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. TOPIC INTRB 1 — COURSE MANAGEMENT Subtopic INTRB 1.1 — Course introduction Subtopic INTRB 1.2 — Course administration Subtopic INTRB 1.3 — Study material and training documentation TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE Subtopic INTRB 2.1 — Course content and organisation Subtopic INTRB 2.2 — Training ethos Subtopic INTRB 2.3 — Assessment process TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE Subtopic INTRB 3.1 — Job prospects </div> </p></div>
response	<div data-bbox="352 1514 1455 1760" data-label="Text"> <p>Partially accepted</p> </div> <div data-bbox="352 1760 1455 2024" data-label="Text"> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as</p> </div>

follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 6: AIRCRAFT

p. 34

comment 11

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIES

Subtopic ACFT 2.1 — Wake turbulence ~~categories~~

TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE

Subtopic ACFT 3.1 — Take-off factors

Subtopic ACFT 3.2 — Climb factors

Subtopic ACFT 3.3 — Final approach and landing factors

Subtopic ACFT 3.4 — Economic factors

~~Subtopic ACFT 3.5 — Miscellaneous factors~~

Subtopic ACFT 3.6-5 — Environmental factors

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which

could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1 —~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 7: HUMAN FACTORS

p. 35

comment 12

comment by: ACCCT TF

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~~Topic HUM 6 WORKING METHODS~~~~Subtopic HUM 6.1 — Efficiency~~**~~Topic HUM 7 WORKING KNOWLEDGE~~**~~Subtopic HUM 7.1 — Controller knowledge~~**TOPIC HUM 8 6 COLLABORATIVE WORK**

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

~~Topic HUM 9 WORK ENVIRONMENT~~~~Subtopic HUM 9.1 — Ergonomics~~**~~TOPIC HUM 10 ATC SAFETY MANAGEMENT~~**~~Subtopic HUM 10.1 — Experience feedback~~~~Subtopic HUM 10.2 — Safety Investigation Branch~~

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **~~TOPIC INTRB 1 — COURSE MANAGEMENT~~**

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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comment 31

comment by: *European HF Advisory group*

Pages 35, 50, 64, 78, 91 and 105

Topic HUM 10 ATC Safety Management

It is a bit surprising to find Safety Management under Human Factors.

Additionally it seems that this module is looking at towards what goes wrong (investigations). This is now an old concept of safety management. The proactive elements of safety management and the need to identify what is being done right seem to be missing.

response *Partially accepted*

The training content proposed for consultation with this NPA is transposed from the EUROCONTROL Specification for the ATCO Common Core Content Initial Training edition 1.0 of 21/10/2008. As described in the Explanatory Note of the NPA, a complete review and update of the Common Core Content has been performed on request by EASA by EUROCONTROL and its ACCCT Task Force.

The resulting amendments proposed by such review and update have been placed by EUROCONTROL as comments to the NPA.

In this context, the subject 'Human Factors' in all Appendixes and their related AMCs has been subject to a complete review, to keep it aligned with the progress of Human Factors theories and to establish a subject matter training content appropriate to the context of ATCO Initial Training.

The entire training content under the topic HUM 10 'ATC safety management' has been reviewed by EUROCONTROL and the ACCCT TF. It is removed from the subject 'Human Factors' and its updated content is placed under the subject 'Aviation law', in all concerned Appendixes and their related AMCs. Additional training objectives are introduced in AMC1 to APPENDIX 3 under subtopic LAWB 4.2, in coordination with EUROCONTROL and the ACCCT TF.

APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 8: EQUIPMENT AND SYSTEMS

p. 36

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:**Subject 1: INTRODUCTION TO THE COURSE**

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 37

comment 26

comment by: ACCCT TF

.....

TOPIC PEN 1 - FAMILIARISATION ~~PROFESSIONAL ENVIRONMENT~~

Subtopic PEN 1.1 — Study visit to aerodrome

Topic PEN 2 - AIRSPACE USERS

Subtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations

Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONS

Subtopic PEN ~~1-2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements

Subtopic PEN 1.3 — Environmental protection

Topic PEN 4 - ENVIRONMENTAL PROTECTION

Subtopic PEN ~~1-3~~ 4.1 — Environmental protection

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**~~

~~**COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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comment

75

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

• ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.

response

Partially accepted

Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasising the need for appropriate consideration of environmental factors in the provision of ATS.

APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS

p. 38

comment

27

comment by: *ACCCT TF*

TOPIC UDES 3 PROCEDURES FOR UNUSUAL/DEGRADED/EMERGENCY SITUATIONS

Subtopic UDES 3.1 — Application of procedures for UDES

Subtopic UDES 3.2 — Radio failure

Subtopic UDES 3.3 — Unlawful interference and aircraft bomb threat

Subtopic UDES 3.4 — Strayed or unidentified aircraft

[Subtopic UDES 3.5 — Runway incursion](#)

response *Partially accepted*

The essential requirement in Annex Vb, 4(c)(i) of the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term 'abnormal' is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for 'abnormal situation' (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further that the definition for abnormal situation includes unusual and degraded situations, and, at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time, and following the comments, the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 4 — AERODROME CONTROL VISUAL RATING (ADV) (Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(i)) — Subject 11: AERODROMES

p. 39

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 1: INTRODUCTION TO THE COURSE**

p. 42

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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stakeholders.

**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 2: AVIATION LAW**

p. 43

comment 8 ❖

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 3: AIR TRAFFIC MANAGEMENT**

p. 44-46

comment 13

comment by: ACCCT TF

TOPIC ATM 1 PROVISION OF SERVICES ~~AIR-TRAFFIC-SERVICES-AND-AIRSPACE-MANAGEMENT~~

Subtopic ATM 1.1 — Aerodrome control service

Subtopic ATM 1.2 — Flight information service (FIS)

Subtopic ATM 1.3 — Alerting service (ALRS)

Subtopic ATM 1.4 — ATS system capacity and air traffic flow management

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TOP TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

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T TOPIC ATM 10 PROVISION OF AN AERODROME CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility for the provision

Subtopic ATM 10.2 — Functions of aerodrome control tower

Subtopic ATM 10.3 — Traffic management process

Subtopic ATM 10.3 4 — Aeronautical ground lights

Subtopic ATM 10.4 5 — Information to aircraft by aerodrome control tower

Subtopic ATM 10.5 6 — Control of aerodrome traffic

Subtopic ATM 10.6 7 — Control of traffic in the traffic circuit

Subtopic ATM 10.7 8 — Runway in use

.....

TOPIC ATM 11 PROVISION OF AERODROME CONTROL — INSTRUMENT

Subtopic ATM 11.1 — Low visibility operations and special VFR

Subtopic ATM 11.2 — Departing traffic

Subtopic ATM 11.3 — Arriving traffic

Subtopic ATM 11.4 — Aerodrome control service with advanced system support

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1~~

	<table><tr><td colspan="2">COURSE MANAGEMENT</td></tr><tr><td>Subtopic INTRB 1.1</td><td>Course introduction</td></tr><tr><td>Subtopic INTRB 1.2</td><td>Course administration</td></tr><tr><td>Subtopic INTRB 1.3</td><td>Study material and training documentation</td></tr><tr><td colspan="2">TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE</td></tr><tr><td>Subtopic INTRB 2.1</td><td>Course content and organisation</td></tr><tr><td>Subtopic INTRB 2.2</td><td>Training ethos</td></tr><tr><td>Subtopic INTRB 2.3</td><td>Assessment process</td></tr><tr><td colspan="2">TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE</td></tr><tr><td>Subtopic INTRB 3.1</td><td>Job prospects</td></tr></table>	COURSE MANAGEMENT		Subtopic INTRB 1.1	Course introduction	Subtopic INTRB 1.2	Course administration	Subtopic INTRB 1.3	Study material and training documentation	TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE		Subtopic INTRB 2.1	Course content and organisation	Subtopic INTRB 2.2	Training ethos	Subtopic INTRB 2.3	Assessment process	TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE		Subtopic INTRB 3.1	Job prospects
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response	<p><i>Partially accepted</i></p> <p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none">• Subjects, topics and subtopics are transposed into Implementing Rules;• Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.																				
comment	<p>83 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>• ADI (TWR), ADV, APP and/or APS; subject 3 AIR TRAFFIC MANAGEMENT, Separation – We miss the subject "Reduction of separation minima in the vicinity of aerodromes" from Doc 4444 para. 6.1</p>																				
response	<p><i>Not accepted</i></p> <p>'Reduction of separation minima', including in the vicinity of an aerodrome, is not missing from ADI rating content. It is intended to be covered within subtopic ATM 6.5 'Reduced separation minima'. The related training objectives may be found in AMC1 to Appendix 5, indicating as mandatory content ICAO</p>																				

Doc 4444.

comment

88

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

· ADI (TWR) and ADV, subject 3, AIR TRAFFIC MANAGEMENT – We miss a subject dealing with “runway condition” and “braking action”.

response

Not accepted

'Runway condition' and 'braking action' is already covered in subtopics ATM 1.2 'Flight information service' and ATM 10.5 'Information to aircraft by aerodrome control tower', being the correspondent training objectives included in AMC1 to Appendix 5. The application of runway conditions and braking action is addressed in training objective ATM 10.7.4 in the aforementioned AMC.

**APPENDIX 5 – AERODROME CONTROL INSTRUMENT RATING FOR TOWER –
ADI (TWR) (Reference Annex I – PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) – Subject 4: METEOROLOGY**

p. 47

comment

29 ❖

comment by: *ENAC-FRANCE*Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 –**

COURSE MANAGEMENT

Subtopic INTRB 1.1 – Course introduction

Subtopic INTRB 1.2 – Course administration

Subtopic INTRB 1.3 – Study material and training documentation

TOPIC INTRB 2 – INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 – Course content and organisation

Subtopic INTRB 2.2 – Training ethos

Subtopic INTRB 2.3 – Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 5: NAVIGATION**

p. 48

comment 20

comment by: ACCCT TF

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TOPIC NAV 2 INSTRUMENTAL NAVIGATION

Subtopic NAV 2.1 — Navigational systems

Subtopic NAV 2.2 — Stabilised approach

Subtopic NAV 2.3 — Instrument departures and arrivals

Subtopic NAV 2.4 — Satellite-based systems

Subtopic NAV 2.5 — PBN applications

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**~~

~~**COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 6: AIRCRAFT**

p. 49

comment 21

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIESSubtopic ACFT 2.1 — Wake turbulence ~~categories~~Subtopic ACFT 2.2 — ~~Application of~~ ICAO approach categories**TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE**

Subtopic ACFT 3.1 — Take-off factors

Subtopic ACFT 3.2 — Climb factors

Subtopic ACFT 3.3 — Final approach and landing factors

Subtopic ACFT 3.4 — Economic factors

~~Subtopic ACFT 3.5 — Miscellaneous factors~~Subtopic ACFT 3.6 ~~5~~ — Environmental factors

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which

could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1 —~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 7: HUMAN FACTORS**

p. 50

comment 12 ❖

comment by: ACCCT TF

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~~Topic HUM 6 WORKING METHODS~~~~Subtopic HUM 6.1 — Efficiency~~**~~Topic HUM 7 WORKING KNOWLEDGE~~**~~Subtopic HUM 7.1 — Controller knowledge~~**TOPIC HUM 8 6 COLLABORATIVE WORK**

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

~~Topic HUM 9 WORK ENVIRONMENT~~~~Subtopic HUM 9.1 — Ergonomics~~**~~TOPIC HUM 10 ATC SAFETY MANAGEMENT~~**~~Subtopic HUM 10.1 — Experience feedback~~~~Subtopic HUM 10.2 — Safety Investigation Branch~~

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 8: EQUIPMENT AND SYSTEMS**

p. 51

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 9: PROFESSIONAL ENVIRONMENT**

p. 52

comment 26 ❖

comment by: ACCCT TF

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TOPIC PEN 1 - FAMILIARISATION ~~PROFESSIONAL ENVIRONMENT~~

Subtopic PEN 1.1 — Study visit to aerodrome

Topic PEN 2 - AIRSPACE USERSSubtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations

Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONSSubtopic PEN ~~1-2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements

Subtopic PEN 1.3 — Environmental protection

Topic PEN 4 - ENVIRONMENTAL PROTECTIONSubtopic PEN ~~1-3~~ 4.1 — Environmental protection

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

76

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

• ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.

response *Partially accepted*

Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasizing the need for appropriate consideration of environmental factors in the provision of ATS.

**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 10: UNUSUAL/DEGRADED/EMERGENCY
SITUATIONS**

p. 53

comment 27 ❖

comment by: ACCCT TF

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TOPIC UDES 3 PROCEDURES FOR UNUSUAL/DEGRADED/EMERGENCY SITUATIONS

Subtopic UDES 3.1 — Application of procedures for UDES

Subtopic UDES 3.2 — Radio failure

Subtopic UDES 3.3 — Unlawful interference and aircraft bomb threat

Subtopic UDES 3.4 — Strayed or unidentified aircraft

[Subtopic UDES 3.5 — Runway incursion](#)

response *Partially accepted*

The essential requirement in Annex Vb, 4(c)(i) of the Basic Regulation requires air traffic controllers to be trained in and qualified for abnormal and emergency situations. This is the reason why the term "abnormal" is used in the subject implementing rule. As regards the original proposal, the Agency considered to be explicit that the rather wide definition proposed for "abnormal situation" (= circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills) does include unusual and degraded situations as well. The examples placed into the definition itself provided an even more detailed description of abnormal situations, amongst which degraded situations are covered with an example in subparagraph (c).

With the view to clarify further, that the definition for abnormal situation includes unusual and degraded situations, and at the same time maintain consistency with the terminology used in the Basic Regulation, the Agency proposes to expand the definition as follows:

'abnormal situation' means circumstances which are neither routinely nor commonly experienced and for which an air traffic controller has not developed automatic skills, including degraded situations.

At the same time and following the comments the examples are placed into AMC material. The training material is also reviewed to ensure the use of consistent terminology.

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**APPENDIX 5 — AERODROME CONTROL INSTRUMENT RATING FOR TOWER —
ADI (TWR) (Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(ii)) — Subject 11: AERODROMES**

p. 54

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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stakeholders.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 1: INTRODUCTION TO THE COURSE

p. 57

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the

ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 2: AVIATION LAW

p. 58

comment 8 ❖

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training,

are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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**(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 3: AIR TRAFFIC MANAGEMENT**

comment 14

comment by: ACCCT TF

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TOPIC ATM 1 PROVISION OF SERVICES ~~AIR TRAFFIC SERVICES AND AIRSPACE MANAGEMENT~~

Subtopic ATM 1.1 — Air traffic control (ATC) service

Subtopic ATM 1.2 — Flight information service (FIS)

Subtopic ATM 1.3 — Alerting service (ALRS)

Subtopic ATM 1.4 — ATS system capacity and air traffic flow management

Subtopic ATM 1.5 — Airspace management (ASM)

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T TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

Subtopic ATM 9.1 — Integrity of the operational environment

Subtopic ATM 9.2 — Verification of the currency of operational procedures

Subtopic ATM 9.3 — Handover-takeover

TOPIC ATM 10 PROVISION OF CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility ~~for the provision~~ and processing of information

Subtopic ATM 10.2 — Approach control

Subtopic ATM 10.3 — Traffic management process

TOPIC ATM 11 HOLDING

Subtopic ATM 11.1 — General holding procedures

~~Subtopic ATM 11.2 — Vertical separation in holding~~

Subtopic ATM 11.3 2 — Approaching aircraft

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response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~~~The subject objective is:~~~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1**~~~~**COURSE MANAGEMENT**~~~~Subtopic INTRB 1.1 — Course introduction~~~~Subtopic INTRB 1.2 — Course administration~~~~Subtopic INTRB 1.3 — Study material and training documentation~~~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~~~Subtopic INTRB 2.1 — Course content and organisation~~~~Subtopic INTRB 2.2 — Training ethos~~~~Subtopic INTRB 2.3 — Assessment process~~~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~~~Subtopic INTRB 3.1 — Job prospects~~response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

84

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

• ADI (TWR), ADV, APP and/or APS; subject 3 AIR TRAFFIC MANAGEMENT, Separation – We miss the subject "Reduction of separation minima in the vicinity of aerodromes" from Doc 4444 para. 6.1

response *Not accepted*

The subject of the proposal does not require application in the Approach Control environment. Title of the related provision in ICAO Doc. 4444 refers to TWR operations. The subject is already addressed by ADV and ADI content.

comment

90

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

· APP subject 3, AIR TRAFFIC MANAGEMENT, Holding –We miss horizontal separation to holding (Doc 4444 para. 5.5).

response

Partially accepted

Subtopic ATM 11.2 has been removed, as all separation issues related to aircraft in holding patterns are now addressed by ATM 6 'Separations'. The specific case of horizontal separation of aircraft in holding is now covered under training objective ATM 6.2.2 'Provide lateral separation', with the reference to ICAO Doc. 4444 and the specific mention to 'holding' in the mandatory content.

APPENDIX 6 – APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I – PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) – Subject 4: METEOROLOGY

p. 61

comment

29 ❖

comment by: *ENAC-FRANCE*

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1—**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 5: NAVIGATION

p. 62

comment 18

comment by: ACCCT TF

TOPIC NAV 1 MAPS AND AERONAUTICAL CHARTS

Subtopic NAV 1.1 — Maps and charts

TOPIC NAV 2 INSTRUMENTAL NAVIGATION

Subtopic NAV 2.1 — Navigational systems

Subtopic NAV 2.2 — Stabilised approach

Subtopic NAV 2.3 — Instrument departures and arrivals

Subtopic NAV 2.4 — Navigational assistance

response

Subtopic NAV 2.3 5— Satellite-based systems
 Subtopic NAV 2.6 — PBN applications

Accepted

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:**Subject 1: INTRODUCTION TO THE COURSE**

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1—**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to

introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 6: AIRCRAFT

p. 63

comment 22

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIESSubtopic ACFT 2.1 — Wake turbulence ~~categories~~Subtopic ACFT 2.2 — ~~Application of~~ ICAO approach categories**TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE**

Subtopic ACFT 3.1 — Climb factors

Subtopic ACFT 3.2 — Cruise factors

Subtopic ACFT 3.3 — Descent and initial approach factors

Subtopic ACFT 3.4 — Final approach and landing factors

Subtopic ACFT 3.5 — Economic factors

~~Subtopic ACFT 3.6 — Miscellaneous factors~~Subtopic ACFT 3.7 ~~6~~ — Environmental factors

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training,

are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 7: HUMAN FACTORS

comment 12 ❖

comment by: ACCCT TF

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~~Topic HUM 6 WORKING METHODS~~~~Subtopic HUM 6.1 — Efficiency~~**~~Topic HUM 7 WORKING KNOWLEDGE~~**~~Subtopic HUM 7.1 — Controller knowledge~~**TOPIC HUM 8 6 COLLABORATIVE WORK**

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

~~Topic HUM 9 WORK ENVIRONMENT~~~~Subtopic HUM 9.1 — Ergonomics~~**~~TOPIC HUM 10 ATC SAFETY MANAGEMENT~~**~~Subtopic HUM 10.1 — Experience feedback~~~~Subtopic HUM 10.2 — Safety Investigation Branch~~

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1**~~

		COURSE MANAGEMENT Subtopic INTRB 1.1 — Course introduction Subtopic INTRB 1.2 — Course administration Subtopic INTRB 1.3 — Study material and training documentation TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE Subtopic INTRB 2.1 — Course content and organisation Subtopic INTRB 2.2 — Training ethos Subtopic INTRB 2.3 — Assessment process TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE Subtopic INTRB 3.1 — Job prospects
response	Partially accepted	
		<p>The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:</p> <ul style="list-style-type: none"> • Subjects, topics and subtopics are transposed into Implementing Rules; • Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment	70	comment by: Luca Valerio Falessi
		NPA 2012-18 (B.III) Appendix 3 Subject 7 Subtopic HUMB 1.2 — Why human factors? <u>The meaning of human factors</u> The subtopic aim isn't clear
response	Accepted	
		The comment relates to a Subtopic of the Basic Training content, included in

Appendix 3. The Subtopic title is modified into 'Relevance of human factors for ATC'.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)

(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010

p. 65

(a)(2)(iii)) — Subject 8: EQUIPMENT AND SYSTEMS

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into

account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 66

comment 25

comment by: ACCCT TF

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TOPIC PEN 1 - FAMILIARISATION ~~PROFESSIONAL ENVIRONMENT~~

Subtopic PEN 1.1 — Study visit to approach control unit

Topic PEN 2 - AIRSPACE USERSSubtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations

Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONSSubtopic PEN ~~1.2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements**Topic PEN 4 - ENVIRONMENTAL PROTECTION**Subtopic PEN ~~1.3~~ 4.1 — Environmental protection

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment	77	comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)
		· ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.
response	Partially accepted	
	Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasizing the need for appropriate consideration of environmental factors in the provision of ATS.	

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)**(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010**

p. 67

(a)(2)(iii)) — Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS

comment	29 ❖	comment by: ENAC-FRANCE
	<p><u>Comment:</u> If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.</p> <p><u>Proposal applicable to BASIC and Ratings:</u> Transfer subject objectives, topics and sub topics from the IR to the AMC</p> <p><u>Example:</u> Subject 1: INTRODUCTION TO THE COURSE The subject objective is:</p> <div> <p>Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. TOPIC INTRB 1 — COURSE MANAGEMENT</p> <p>Subtopic INTRB 1.1 — Course introduction</p> <p>Subtopic INTRB 1.2 — Course administration</p> <p>Subtopic INTRB 1.3 — Study material and training documentation</p> <p>TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE</p> <p>Subtopic INTRB 2.1 — Course content and organisation</p> <p>Subtopic INTRB 2.2 — Training ethos</p> <p>Subtopic INTRB 2.3 — Assessment process</p> <p>TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE</p> <p>Subtopic INTRB 3.1 — Job prospects</p> </div>	

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and sub-topics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 6 — APPROACH CONTROL PROCEDURAL RATING (APP)
(Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010
(a)(2)(iii)) — Subject 11: AERODROMES

p. 68

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1**~~

COURSE MANAGEMENT~~Subtopic INTRB 1.1 — Course introduction~~~~Subtopic INTRB 1.2 — Course administration~~~~Subtopic INTRB 1.3 — Study material and training documentation~~~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~~~Subtopic INTRB 2.1 — Course content and organisation~~~~Subtopic INTRB 2.2 — Training ethos~~~~Subtopic INTRB 2.3 — Assessment process~~~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~~~Subtopic INTRB 3.1 — Job prospects~~response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference:**Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) —**

p. 71

Subject 1: INTRODUCTION TO THE COURSE

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep

only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

Subject 2: AVIATION LAW

comment 8 ❖

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference:**Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) —**

p. 73-74

Subject 3: AIR TRAFFIC MANAGEMENT

comment 16

comment by: ACCCT TF

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TOPIC ATM 1 PROVISION OF SERVICES ~~AIR TRAFFIC SERVICES AND AIRSPACE MANAGEMENT~~

Subtopic ATM 1.1 — Air traffic control (ATC) service

Subtopic ATM 1.2 — Flight information service (FIS)

Subtopic ATM 1.3 — Alerting service (ALRS)

Subtopic ATM 1.4 — ATS system capacity and air traffic flow management

Subtopic ATM 1.5 — Airspace management (ASM)

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T TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

Subtopic ATM 9.1 — Integrity of the operational environment

Subtopic ATM 9.2 — Verification of the currency of operational procedures

Subtopic ATM 9.3 — Handover-takeover

TOPIC ATM 10 PROVISION OF CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility and processing of information

Subtopic ATM 10.2 — Area control

[Subtopic ATM 10.3 — Traffic management process](#)response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and

justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 4: METEOROLOGY

p. 75

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 5: NAVIGATION

p. 76

comment 19

comment by: ACCCT TF

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TOPIC NAV 2 INSTRUMENTAL NAVIGATION

Subtopic NAV 2.1 — Navigational systems

Subtopic NAV 2.2 — Navigational assistance

Subtopic NAV 2.3 — PBN applications

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from

stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 6: AIRCRAFT

p. 77

comment 23

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIES

Subtopic ACFT 2.1 — Wake turbulence ~~categories~~

TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE

Subtopic ACFT 3.1 — Climb factors

Subtopic ACFT 3.2 — Cruise factors

Subtopic ACFT 3.3 — Descent factors

Subtopic ACFT 3.4 — Economic factors

~~Subtopic ACFT 3.5 — Miscellaneous factors~~

~~Subtopic ACFT 3.5 — Environmental factors~~

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the~~

response *Partially accepted*

potential for development of their careers in ATC. ~~TOPIC INTRB 1 — COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 7: HUMAN FACTORS

p. 78

comment 12 ❖

comment by: ACCCT TF

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Topic HUM-6 WORKING METHODS

~~Subtopic HUM 6.1 — Efficiency~~

~~Topic HUM 7 WORKING KNOWLEDGE~~

~~Subtopic HUM 7.1 — Controller knowledge~~

TOPIC HUM 8 6 COLLABORATIVE WORK

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

~~Topic HUM 9 WORK ENVIRONMENT~~

~~Subtopic HUM 9.1 — Ergonomics~~

TOPIC HUM 10 ATC SAFETY MANAGEMENT

Subtopic HUM 10.1 — Experience feedback

Subtopic HUM 10.2 — Safety Investigation Branch

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~

TOPIC INTRB 1 — COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 8: EQUIPMENT AND SYSTEMS

p. 79

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. TOPIC INTRB 1 —~~
COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction
Subtopic INTRB 1.2 — Course administration
Subtopic INTRB 1.3 — Study material and training documentation
TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE
Subtopic INTRB 2.1 — Course content and organisation
Subtopic INTRB 2.2 — Training ethos
Subtopic INTRB 2.3 — Assessment process
TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE
Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 7 — AREA CONTROL PROCEDURAL RATING (ACP) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 80

comment 24

comment by: ACCCT TF

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TOPIC PEN 1 - FAMILIARISATION PROFESSIONAL ENVIRONMENT
Subtopic PEN 1.1 — Study visit to area control centre
Topic PEN 2 - AIRSPACE USERS

response

Accepted

Subtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations
 Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONS

Subtopic PEN ~~1.2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements

Topic PEN 4 - ENVIRONMENTAL PROTECTION

Subtopic PEN ~~1.3~~ 4.1 — Environmental protection

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

78

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

• ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.

response

Partially accepted

Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasizing the need for appropriate consideration of environmental factors in the provision of ATS.

APPENDIX 7 – AREA CONTROL PROCEDURAL RATING (ACP) (Reference:

Annex I – PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(iv)) –

p. 81

Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS

comment

29 ❖

comment by: *ENAC-FRANCE*

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics

should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. ~~TOPIC INTRB 1 —~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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ATCO.D.010(a)(2)(v)) — Subject 1: INTRODUCTION TO THE COURSE

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 2: AVIATION LAW

p. 85

comment 8 ❖

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)

(Reference Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(v)) — Subject 3: AIR TRAFFIC MANAGEMENT

p. 86-87

comment 15

comment by: ACCCT TF

TOPIC ATM 1 PROVISION OF SERVICES ~~AIR TRAFFIC SERVICES AND AIRSPACE MANAGEMENT~~

Subtopic ATM 1.1 — Aerodrome control service
 Subtopic ATM 1.2 — Flight information service (FIS)
 Subtopic ATM 1.3 — Alerting service (ALRS)
 Subtopic ATM 1.4 — ATS system capacity and air traffic flow management
 Subtopic ATM 1.5 - Airspace managementt

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TOPIC ATM 6 SEPARATIONS

Subtopic ATM 6.1 — Vertical separation
 Subtopic ATM 6.2 — Longitudinal ~~Horizontal~~ separation in a surveillance environment
 Subtopic ATM 6.3 — Delegation of separation
 Subtopic ATM 6.4 — Wake turbulence distance-based separation
 Subtopic ATM 6.5 — Separation based on ATS surveillance systems

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TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

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T TOPIC ATM 10 PROVISION OF CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility and processing of information
 Subtopic ATM 10.2 — ATS surveillance service
 Subtopic ATM 10.3 — Traffic management process
 Subtopic ATM 10.3 4 — Vectoring
 Subtopic ATM 10.4 5 — Control service with advanced system support

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response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. TOPIC INTRB 1—~~
COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction
Subtopic INTRB 1.2 — Course administration
Subtopic INTRB 1.3 — Study material and training documentation
TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE
Subtopic INTRB 2.1 — Course content and organisation
Subtopic INTRB 2.2 — Training ethos
Subtopic INTRB 2.3 — Assessment process
TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE
Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

85

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

• ADI (TWR), ADV, APP and/or APS; subject 3 AIR TRAFFIC MANAGEMENT, Separation – We miss the subject "Reduction of separation minima in the vicinity of aerodromes" from Doc 4444 para. 6.1

response

Not accepted

The subject of the proposal does not require application in the Approach Control environment. Title of the related provision in ICAO Doc. 4444 refers to TWR operations. The subject is already addressed by ADV and ADI content.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 4: METEOROLOGY

p. 88

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 5: NAVIGATION

p. 89

comment 18 ❖

comment by: ACCCT TF

TOPIC NAV 1 MAPS AND AERONAUTICAL CHARTS

Subtopic NAV 1.1 — Maps and charts

TOPIC NAV 2 INSTRUMENTAL NAVIGATION

Subtopic NAV 2.1 — Navigational systems

Subtopic NAV 2.2 — Stabilised approach

Subtopic NAV 2.3 — Instrument departures and arrivals

Subtopic NAV 2.4 — Navigational assistance

Subtopic NAV 2.5 — Satellite-based systems

Subtopic NAV 2.6 — PBN applications

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)

(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 6: AIRCRAFT

p. 90

comment 22 ❖

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIESSubtopic ACFT 2.1 — Wake turbulence ~~categories~~Subtopic ACFT 2.2 — ~~Application of~~ ICAO approach categories**TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE**

Subtopic ACFT 3.1 — Climb factors

Subtopic ACFT 3.2 — Cruise factors

Subtopic ACFT 3.3 — Descent and initial approach factors

Subtopic ACFT 3.4 — Final approach and landing factors

Subtopic ACFT 3.5 — Economic factors

~~Subtopic ACFT 3.6 — Miscellaneous factors~~Subtopic ACFT 3.7 ~~6~~ — Environmental factorsresponse *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 7: HUMAN FACTORS

p. 91

comment 12 ❖

comment by: ACCCT TF

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Topic ~~HUM-6 WORKING METHODS~~

~~Subtopic HUM-6.1 — Efficiency~~

Topic ~~HUM-7 WORKING KNOWLEDGE~~

~~Subtopic HUM-7.1 — Controller knowledge~~

TOPIC HUM ~~8~~ 6 COLLABORATIVE WORK

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

Topic ~~HUM-9 WORK ENVIRONMENT~~

~~Subtopic HUM-9.1 — Ergonomics~~

TOPIC HUM 10 ATC SAFETY MANAGEMENT

Subtopic HUM 10.1 — Experience feedback

Subtopic HUM 10.2 — Safety Investigation Branch

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into

account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)

(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 8: EQUIPMENT AND SYSTEMS

p. 92

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 93

comment 25 ❖

comment by: ACCCT TF

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TOPIC PEN 1 - FAMILIARISATION ~~PROFESSIONAL ENVIRONMENT~~

Subtopic PEN 1.1 — Study visit to approach control unit

Topic PEN 2 - AIRSPACE USERS

Subtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations

Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONS

Subtopic PEN ~~1-2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements

Topic PEN 4 - ENVIRONMENTAL PROTECTION

Subtopic PEN ~~1-3~~ 4.1 — Environmental protection

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

~~The subject objective is:~~

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1**~~

~~**COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

comment

79

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

• ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.

response

Partially accepted

Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasizing the need for appropriate consideration of environmental factors in the provision of ATS.

APPENDIX 8 – APPROACH CONTROL SURVEILLANCE RATING (APS)
(Reference Annex I – PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) – Subject 10: UNUSUAL/DEGRADED/EMERGENCY
SITUATIONS

p. 94

comment

29 ❖

comment by: *ENAC-FRANCE*Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and sub-topics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 8 — APPROACH CONTROL SURVEILLANCE RATING (APS)

(Reference Annex I — PART-ATCO Subpart D, Section 2,
ATCO.D.010(a)(2)(v)) — Subject 11: AERODROMES

p. 95

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from

stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 1: INTRODUCTION TO THE COURSE

p. 98

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the

ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 2: AVIATION LAW

p. 99

comment 8 ❖

comment by: ACCCT TF

TOPIC LAW 1 ATCO LICENSING/CERTIFICATE OF COMPETENCE

Subtopic LAW 1.1 — Privileges and conditions

TOPIC LAW 2 RULES AND REGULATIONS

Subtopic LAW 2.1 — Reports

Subtopic LAW 2.2 — Airspace

TOPIC LAW 3 - ATC SAFETY MANAGEMENT

Subtopic LAW 3.1 — Feedback process

Subtopic LAW 3.2 — Safety investigation

response *Accepted*

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in

Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — p. 100-101
Subject 3: AIR TRAFFIC MANAGEMENT

comment 17

comment by: ACCCT TF

TOPIC ATM 1 PROVISION OF SERVICES ~~AIR TRAFFIC SERVICES AND AIRSPACE MANAGEMENT~~

Subtopic ATM 1.1 — Aerodrome control service
 Subtopic ATM 1.2 — Flight information service (FIS)
 Subtopic ATM 1.3 — Alerting service (ALRS)
 Subtopic ATM 1.4 — ATS system capacity and air traffic flow management
 Subtopic ATM 1.5 - Airspace management

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TOPIC ATM 6 SEPARATIONS

Subtopic ATM 6.1 — Vertical separation
 Subtopic ATM 6.2 — Longitudinal ~~Horizontal~~ separation in a surveillance environment
 Subtopic ATM 6.3 — Wake turbulence distance-based separation
 Subtopic ATM 6.4 — Separation based on ATS surveillance systems

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TOPIC ATM 9 OPERATIONAL ENVIRONMENT (SIMULATED)

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T TOPIC ATM 10 PROVISION OF CONTROL SERVICE

Subtopic ATM 10.1 — Responsibility and processing of information
 Subtopic ATM 10.2 — ATS surveillance service
 Subtopic ATM 10.3 — Traffic management process
 Subtopic ATM 10.3 4 — Vectoring
 Subtopic ATM 10.4 5 — Control service with advanced system support

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response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

~~Subject 1: INTRODUCTION TO THE COURSE~~

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 —**~~

~~COURSE MANAGEMENT~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

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APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference:

Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) —

p. 102

Subject 4: METEOROLOGY

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from

stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 5: NAVIGATION

p. 103

comment 19 ❖

comment by: ACCCT TF

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TOPIC NAV 2 INSTRUMENTAL NAVIGATION
 Subtopic NAV 2.1 — Navigational systems
 Subtopic NAV 2.2 — Navigational assistance
 Subtopic NAV 2.3 — PBN applications

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 6: AIRCRAFT

p. 104

comment 23 ❖

comment by: ACCCT TF

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TOPIC ACFT 2 AIRCRAFT CATEGORIES

Subtopic ACFT 2.1 — Wake turbulence *categories*

TOPIC ACFT 3 FACTORS AFFECTING AIRCRAFT PERFORMANCE

Subtopic ACFT 3.1 — Climb factors

Subtopic ACFT 3.2 — Cruise factors

Subtopic ACFT 3.3 — Descent factors

response

Subtopic ACFT 3.4 — Economic factors
~~Subtopic ACFT 3.5 — Miscellaneous factors~~
 Subtopic ACFT 3.5 — Environmental factors

Accepted

comment

29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE

Subtopic INTRB 3.1 — Job prospects

response

Partially accepted

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into

account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 7: HUMAN FACTORS

p. 105

comment 12 ❖

comment by: ACCCT TF

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~~Topic HUM 6 WORKING METHODS~~~~Subtopic HUM 6.1 — Efficiency~~**~~Topic HUM 7 WORKING KNOWLEDGE~~**~~Subtopic HUM 7.1 — Controller knowledge~~**TOPIC HUM 8 6 COLLABORATIVE WORK**

Subtopic HUM 6.1 — Communication

Subtopic HUM 6.2 — Collaborative work within the same area of responsibility

Subtopic HUM 6.3 — Collaborative work between different areas of responsibility

Subtopic HUM 6.4 — Controller/pilot cooperation

~~Topic HUM 9 WORK ENVIRONMENT~~~~Subtopic HUM 9.1 — Ergonomics~~**~~TOPIC HUM 10 ATC SAFETY MANAGEMENT~~**~~Subtopic HUM 10.1 — Experience feedback~~~~Subtopic HUM 10.2 — Safety Investigation Branch~~

response Accepted

comment 29 ♦

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from

stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 8: EQUIPMENT AND SYSTEMS

p. 106

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC. **TOPIC INTRB 1 — COURSE MANAGEMENT**~~

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

~~**TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE**~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~**TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE**~~

~~Subtopic INTRB 3.1 — Job prospects~~

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the

ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
- Subject objectives and training objectives are transposed into AMCs. The AMCs now include also the subjects, topics and subtopics referred to the subject objectives and training objectives, with the indication of their different regulatory status. With this approach, the entire Common Core Content is available in a single source document, in order to facilitate its reading, as requested by several comments from stakeholders.

APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference: Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) — Subject 9: PROFESSIONAL ENVIRONMENT

p. 107

comment 24 ❖

comment by: ACCCT TF

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TOPIC PEN 1 - FAMILIARISATION ~~PROFESSIONAL ENVIRONMENT~~

Subtopic PEN 1.1 — Study visit to area control centre

Topic PEN 2 - AIRSPACE USERS

Subtopic PEN ~~1~~ 2.1 — Contributors to civil ATS operations

Subtopic PEN 2.2 — Contributors to military ATS operations

Topic PEN 3 - CUSTOMER RELATIONS

Subtopic PEN ~~1-2~~ 3.1 — ~~Customer relations~~ Provision of services and user requirements

Topic PEN 4 - ENVIRONMENTAL PROTECTION

Subtopic PEN ~~1-3~~ 4.1 — Environmental protection

response Accepted

comment 29 ❖

comment by: ENAC-FRANCE

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 —**

COURSE MANAGEMENT

Subtopic INTRB 1.1 — Course introduction

Subtopic INTRB 1.2 — Course administration

Subtopic INTRB 1.3 — Study material and training documentation

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

Subtopic INTRB 2.1 — Course content and organisation

Subtopic INTRB 2.2 — Training ethos

Subtopic INTRB 2.3 — Assessment process

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

Subtopic INTRB 3.1 — Job prospects

response *Partially accepted*

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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stakeholders.

comment

80

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

· ADI (TWR), APP, ACP, APS, ACS; subject 9, PROFESSIONAL ENVIRONMENT – As a balance to the subjects under this heading we suggest an additional subject concerning the balance between environmental considerations and safety.

response

Partially accepted

Subtopic PENB 4.1 'Environmental protection' has been revised as in Comment #10 to B.V; it now includes 3 training objectives, namely PENB 4.1.1, PENB 4.1.2 and PENB 4.1.3, aiming at emphasizing the need for appropriate consideration of environmental factors in the provision of ATS.

**APPENDIX 9 — AREA CONTROL SURVEILLANCE RATING (ACS) (Reference:
Annex I — PART-ATCO Subpart D, Section 2, ATCO.D.010(a)(2)(vi)) —
Subject 10: UNUSUAL/DEGRADED/EMERGENCY SITUATIONS**

p. 108

comment

29 ❖

comment by: *ENAC-FRANCE*

Comment:

If the minimum requirements for the training of the ATCO, as stated in Eurocontrol 's specification for the ATCO Common Core Content Initial Training, are transposed into EU law (BI (12) page 5), then it would be easier to keep only subject titles in the IR. The subject objectives, topics and sub topics should be in the AMC in order to have a single, easy to use document which could be modified when necessary.

Proposal applicable to BASIC and Ratings:

Transfer subject objectives, topics and sub topics from the IR to the AMC

Example:

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

~~Learners shall know and understand the training programme that they will follow and how to obtain the appropriate information, and recognise the potential for development of their careers in ATC.~~ **TOPIC INTRB 1 — COURSE MANAGEMENT**

~~Subtopic INTRB 1.1 — Course introduction~~

~~Subtopic INTRB 1.2 — Course administration~~

~~Subtopic INTRB 1.3 — Study material and training documentation~~

response *Partially accepted*

~~TOPIC INTRB 2 — INTRODUCTION TO THE ATC TRAINING COURSE~~

~~Subtopic INTRB 2.1 — Course content and organisation~~

~~Subtopic INTRB 2.2 — Training ethos~~

~~Subtopic INTRB 2.3 — Assessment process~~

~~TOPIC INTRB 3 — INTRODUCTION TO THE ATCO'S FUTURE~~

~~Subtopic INTRB 3.1 — Job prospects~~

The rationale for the transposition of the EUROCONTROL Specification for the ATCO CCC Initial Training with the proposed methodology is explained and justified in the Regulatory Impact Assessment (C) attached to the NPA. In order to provide more flexibility as regards future updates, and, taking into account comments received on this subject, the Agency has decided to introduce a change to the proposed methodology for the transposition, as follows:

- Subjects, topics and subtopics are transposed into Implementing Rules;
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APPENDIX 10 — CERTIFICATE FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS (ATCO TOS)

p. 109-110

comment 36

comment by: *skyguide Corporate Regulation Management*

APPENDIX 10

CERTIFICATE FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS (ATCO TOS) and ATCO.AR.E.001(d)

It is proposed to use the certificate template from Eurocontrol as it will better suit the purpose. This template does not reflect the requirements for a training organisation certificate.

response *Not accepted*

Appendix 10 shows a layout of air traffic controller training organisation certificate. The privileges granted by the certificate are specified therein in accordance with Article 8c of Regulation (EC) No 216/2008 aiming at facilitating the mutual recognition. It is revised to reflect the latest amendments stemming from the NPA consultation.

comment

41

comment by: AESA / DSANA

Attachment [#1](#)

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
APPENDIX 10 TO COMMISSION REGULATION (EU) NO .../... CERTIFICATE FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS (ATCO TOs)		Types of training are supposed to be: - Initial - Unit - Continuation - Instructor - Assessor Refresher training and Conversion training are, by definition, part of the continuation training. Therefore, the proposed change seems to be in line with the rest of the table (regarding the format, those two cells should be merged)

response

Accepted

comment

54

comment by: Civil Aviation Authority Norway

The template is too detailed:

Type of training:

- Remove Refresher training and Conversion training
- Replace with ATCO continuation training
- Remove the four boxes with initial training and refresher training

response

Accepted

The proposals are accepted also taking into consideration the changes for revalidation of endorsements.

comment

73

comment by: Swedish Transport Agency, Civil Aviation Department

	(Transportstyrelsen, Luftfartsavdelningen)	
	<p>· Appendix 10 - The template is too detailed; suggest one box with "ATCO continuation training" instead of two boxes ("ATCO refresher training" and "ATCO conversion training"). Suggest that the boxes with "practical instructor training" and "assessor training" don't have separate boxes for "initial training" and "refresher training" as their training course include both "initial training" and "refresher training".</p>	
response	Accepted	
	The proposals are accepted also taking into consideration the changes for revalidation of endorsements.	
comment	119	comment by: Federal Office of Civil Aviation FOCA
	<p>Article: training organisation certificate Comment / Issue / Suggestion: Suggest delete Justification: It is important to define the relevant information needed to be stated on a licence/certificate. It should, however, remain in the competence of the competent authority to define the layout of such documents as long as the information contained fulfills the requirements of this regulation.</p>	
response	Not accepted	
	<p>In accordance with Article 8c of Regulation (EC) No 216/2008 the training organisations for air traffic controllers are required to hold a certificate which capability to discharge responsibilities associated with their privileges shall be recognised by the issuance of a certificate. The purpose of the certificate template is to facilitate the mutual recognition.</p>	

APPENDIX 11 — CERTIFICATE FOR AERO-MEDICAL EXAMINERS (AMEs)

p. 111-112

comment	55	comment by: Civil Aviation Authority Norway
	See general comments under B.III	
response	Noted	

APPENDIX 12 — CERTIFICATE FOR AERO-MEDICAL CENTRES (AeMCs)

p. 113

comment

51

comment by: DGA FLIGHT TESTING

FT RATING COURSE

Subject 1: INTRODUCTION TO THE COURSE

The subject objective is:

Learners shall know and understand the training program that they will follow and learn how to obtain the appropriate information.

TOPIC INTRO 1 COURSE MANAGEMENT

Subtopic INTRO 1.1 — Course introduction

Subtopic INTRO 1.2 — Course administration

Subtopic INTRO 1.3 — Study material and training documentation

TOPIC INTRO 2 INTRODUCTION TO THE ATC TRAINING COURSE

Subtopic INTR 2.1 — Course content and organization

Subtopic INTR 2.2 — Training ethos

Subtopic INTR 2.3 — Assessment process

Subject 2: SCOPE OF FLIGHT TESTING

The subject objective is:

Learners shall understand the purpose of flight testing and integrate airworthiness issues in the provision of flight tests ATS.

TOPIC FT 1 AIRWORTHINESS REQUIREMENTS

Subtopic FT 1.1 — Airworthiness codes

Subtopic FT 1.2 — Flight test guide for CS aircrafts

Subtopic FT 1.3 — Prototypes and concept aircrafts

TOPIC FT 2 TEST AND ACCEPTANCE TRAFFIC ASPECTS

Subtopic FT 2.1 — Performance flight testing methods

Subtopic FT 2.2 — Handling qualities testing methods

Subtopic FT 2.3 — Systems- CNS and on-board safety systems testing methods

Subject 3: REGULATIONS AND EXEMPTIONS

The subject objective is:

Learners shall know, understand and apply the Rules of the Air and ATM regulations, and the principles of exemptions regarding the needs of flight test, and also take into account licensing and competence principles.

TOPIC REG 1 ATC LICENCING / CERTIFICATE OF COMPETENCE

Subtopic REG 1.1 — Privileges and conditions

TOPIC REG 2 EXEMPTIONS REGARDING ATM REGULATIONS

Subtopic REG 2.1 — ICAO annexes and rules of the air

Subtopic REG 2.2 — ATM Regulations regarding airspace

Subtopic REG 2.3 — Airworthiness

Subtopic REG 2.4 — Flight test exemptions

Subject 4: AIRCRAFT ENVIRONMENT

The subject objective is:

Learners shall know the theory of flight, aircraft sub-systems and integrate aircraft performances, limitations and handling qualities in the provision of Flight tests ATS.

TOPIC ACFT 1 AIRCRAFT FLIGHT DYNAMICS

Subtopic ACFT 1.1 — Aircraft control and movement

Subtopic ACFT 1.2 — Performance testing

Subtopic ACFT 1.3 — handling qualities

Subtopic ACFT 1.4 — Aero-elastic/Flutter Stability

Subtopic ACFT 1.5 — Flight envelope

Subtopic ACFT 1.6 — Helicopter specific dynamics

TOPIC ACFT 2 AIRCRAFT ENGINES

Subtopic ACFT 2.1 — The piston engine

Subtopic ACFT 2.2 — The turboshaft engine

Subtopic ACFT 2.3 — Jet and turbofan

TOPIC ACFT 3 AIRCRAFT SYSTEMS

Subtopic ACFT 3.1 — Flight control systems

Subtopic ACFT 3.2 — Safety systems

Subtopic ACFT 3.3 — Communication and navigation systems

Subject 5: FLIGHT TESTING AIR TRAFFIC MANAGEMENT

The subject objective is:

Learners shall manage air traffic in complete safety, with methods to ensure a satisfactory rate of success regarding flight testing.

TOPIC FTATM 1 AIR TRAFFIC SERVICES AND AIRSPACE MANAGEMENT

Subtopic FTATM 1.1 — Air traffic control (ATC) service

Subtopic FTATM 1.2 — Flight information service (FIS)

Subtopic FTATM 1.3 — Alerting service

TOPIC FTATM 2 EXEMPTIONS DUE TO TESTING DEMONSTRATIONS

Subtopic FTATM 2.1 — Demonstration of compliance with airworthiness regulations

Subtopic FTATM 2.2 — Flight test for evaluation of an aircraft

Subtopic FTATM 2.3 — Flight test for evaluation of an aircraft sub system

TOPIC FTATM 3 FLIGHT TEST METHODS IN AERODROME CONTROL AREA

Subtopic FTATM 3.1 — Velocity of minimum control on ground

Subtopic FTATM 3.2 — Velocity of minimum Unstick

Subtopic FTATM 3.3 — Lapse Rate take off

Subtopic FTATM 3.4 — Rejected take off

Subtopic FTATM 3.5 — Tower flyby method

Subtopic FTATM 3.6 — Hover manoeuvre methods

Subtopic FTATM 3.7 — Landing performances testing methods

Subtopic FTATM 3.8 — Other flight testing maneuvers

TOPIC FTATM 4 FLIGHT TEST METHODS IN APPROACH CONTROL AREA

Subtopic FTATM 4.1 — Velocity of minimum control in the air / Stalls

Subtopic FTATM 4.2 — Tuning of flight controls protections

Subtopic FTATM 4.3 — Autopilot tuning

Subtopic FTATM 4.4 — Wind milling/RAM Air turbine/Engine relights

Subtopic FTATM 4.5 — Trailing pitot static method

Subtopic FTATM 4.6 — Lateral and Longitudinal stability flights

Subtopic FTATM 4.7 — Flight in specific meteorological conditions

Subtopic FTATM 4.8 — Supersonic flights

Subtopic FTATM 4.9 — Other flight testing various maneuvers

Subject 6: HUMAN FACTORS

The subject objective is:

Learners shall recognize the necessity to constantly consider the specific human factors influence on tests activity management.

TOPIC HUM 1 CUSTOMERS RELATIONS AND ORGANIZATION

Subtopic HUM 1.1 — Stress

Subtopic HUM 1.2 — Responsible behavior

Subtopic HUM 1.3 — Violation of rules

TOPIC HUM 2 FLIGHT TEST WORKING METHODS

Subtopic HUM 2.1 — Collaborative work within the same area of responsibility

Subtopic HUM 2.2 — Collaborative work between different areas of responsibility

Subtopic HUM 2.3 — FT-ATCO/CREW cooperation

Subtopic HUM 2.4 — Communication

TOPIC HUM 3 FLIGHT TEST SAFETY CONSOLIDATION

Subtopic HUM 3.1 — Safety risk assessment

	<p>Subtopic HUM 3.2 — Experience feedback Subtopic HUM 3.3 — Unusual/Degraded/Emergency situations Subtopic HUM 3.4 — Safety Investigation Branch Subject 7: METEOROLOGY The subject objective is: Learners shall acquire, decode and make proper use of meteorological information relevant to the airworthiness issues and the safe provision of flight tests ATS.</p> <p>TOPIC MTO 1 METEOROLOGICAL AND AIRWORTHINESS CONCERNS</p> <p>Subtopic MTO 1.1 — Airworthiness meteorological requirements Subtopic MTO 1.2 — Visual flight conditions phases Subtopic MTO 1.3 — Icing testing concerns Subtopic MTO 1.4 — Wind</p>
response	<p><i>Partially accepted</i></p> <p>The Agency accepts the need for special provisions for ATS providers providing services to aircraft undergoing flight tests, in particular when those flight tests are carried out in cohabitation with other airspace users in controlled or non-controlled airspace, which are also specifically addressed in NPA 2013-08, however, the way chosen to accommodate such service providers and their air traffic controllers is different from the proposal received in the comment.</p> <p>The amended proposal builds on the fact that, while most of the existing requirements within the proposed Regulation are applicable, the Agency recognises the need for additional requirements, especially in the field of training, more specifically, unit training, which are to ensure the ability of the air traffic controllers to provide air traffic control services to aircraft carrying out flight tests.</p> <p>Therefore, the Agency proposes to require such air traffic controllers to meet additional requirements to those of the regular unit endorsement course. To this end specific performance objectives are set out and further details of the specific training is provided in Guidance Material in order to assist affected ATS providers to establish the necessary training.</p> <p>The resulting text is available under ATCO.B.020.</p>
comment	<p>56 comment by: <i>Civil Aviation Authority Norway</i></p> <p>See general comments under B.III</p>
response	<p><i>Noted</i></p>

2. Extracts of resulting text

For the extracts of the resulting text please refer to **Annex B.III(b)** published at <http://easa.europa.eu/rulemaking/comment-response-documents-CRDs-and-review-groups.php>

3. Appendix A — Attachments

 [Doc1.pdf](#)

Attachment #1 to comment [#41](#)