



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

CRD to NPA 2012-18 (B.IV(a)) — RMT.0153 (ATM.003(a)) & RMT.0154 (ATM.003(b)) —
01/10/2013

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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	293	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	<i>Noted</i>	

NPA 2012-18 (B.IV) 'Licensing and medical certification of air traffic controllers' — Acceptable Means of Compliance and Guidance Material to Part-ATCO, to Part-ATCO.AR and to Part-ATCO.OR — General comments

p. 1-5

comment	70	comment by: <i>CAA-NL</i>
	<p>This is to notify that the comments on NPA 2012-18 (B.IV) under the header 'CAA-NL' are issued by CAA-NL and Air Traffic Control The Netherlands/Luchtverkeersleiding Nederland (LVNL) together.</p>	
response	<i>Noted</i>	

comment	101	comment by: <i>CAA-NL</i>
response	<i>Noted</i>	

comment	128	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>General comment</p> <p>Given that in many cases the competent authority to whom the ATCO.AR IR, AMC and GM applies will be the same body for more than one aviation domain (e.g. competent authority for ANSPs) it would be beneficial if similar provisions (e.g. management system) were identical unless there is a sector specific reason for them to be different (e.g. the use of a sector specific terminology). A number of instances where it is believed that proposed rules differ from those with the same intent in other EASA rules have been commented upon, however the comments are not exhaustive.</p> <p>Suggest that provisions for CAs should be aligned across all regulations.</p>	
response	<p><i>Accepted</i></p> <p>The Agency agrees with this holistic approach. However, at this stage, the Agency could only propose identical requirements aligned as much as possible between the different aviation domains regulations.</p>	
comment	129	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>General comment</p> <p>Given that in many cases the ANSP to whom the ATCO.OR IR, AMC and GM applies will be the same body for more than one aviation domain (e.g. ANSP and training organisation) it would be beneficial if similar provisions (e.g. management system) were identical unless there is a sector specific reason for them to be different (e.g. the use of a sector specific terminology). A number of instances where it is believed that proposed rules differ from those with the same intent in other EASA rules have been commented upon, however the comments are not exhaustive.</p> <p>Suggest that provisions for ANSPs should be aligned across all regulations.</p>	
response	<p><i>Accepted</i></p> <p>The Agency agrees with this holistic approach. However, at this stage, the Agency could only propose identical requirements aligned as much as possible between the different aviation domains regulations.</p>	
comment	130	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>General comment</p> <p>It is understood that compliance with AMC gives the presumption of compliance with the related IR then a large amount of AMC appears to be inadequate insofar as it either does not adequately relate to the IR, details requirements that cannot be traced back to the IR, is more appropriately IR (as it has additional requirements) or should be GM as it is more of an explanation rather than an elaboration of the IR. A number of instances where it is believed that</p>	

	<p>proposed AMC is inadequate have been commented upon, however the comments are not exhaustive as the scale of the problem is so large and the time available to comment so short. Ideally the majority of the AMC (and GM) needs to be rewritten. Selected quote from EASA website with selected highlights: "AMCs are defined as non-binding standards adopted by the Agency to illustrate means to establish compliance with the Basic Regulation and its Implementing Rules. The AMCs issued by the Agency are not of a legislative nature; therefore they cannot create obligations on the regulated persons, who may decide to show compliance with the applicable requirements using other means. However, as the legislator wanted such material to provide for legal certainty and to contribute to uniform implementation, it must commit competent authorities so that regulated persons complying with an Agency AMC must be recognised as complying with the law."</p>
response	<p><i>Partially accepted</i></p> <p>The Agency agrees with the comment insofar as the traceability and titles of the AMC and GM material require further development in order to establish clear link between them and the relevant IR provisions. This task is undertaken by the Agency. Regarding the content of the AMC and GM material the Agency considers that the proposals published in the NPA provided a good basis for consultation, which is also acknowledged by other comments. The comments received on the AMC and GM material are certainly taken into account for the further development of this material, including the shifting of elements previously proposed as AMC into GM.</p>

COVER REGULATION — GM1 Article 6 Means of compliance

p. 6

comment	<p>282 comment by: EUROCONTROL</p> <p>Article 6 (a): suggest to add ... <i>and corresponding Implementing Rule of Regulation (EC) No 216/2008, indicating...</i></p>
response	<p><i>Accepted</i></p> <p>During the consultation of NPA 2012-18 the Agency is invited to align, as much as possible, the requirements related to competent authorities unless there is a sector specific reason for them to be different due to the fact that in many cases the authority responsible for the oversight of ANSP and training organisation is the same body for more than one aviation domains. However, it should be noted that in accordance with Article 3 (4) of the subject rule AltMOC means an alternative to an existing AMC or a new means to establish compliance with Regulation (EC) No 216/2008 and its Implementing Rules for which no associated AMC have been adopted by the Agency. The corresponding provisions as well as the subject AMC are moved to Part-ATCO.AR and Part-ATCO.OR respectively.</p>

COVER REGULATION — GM1 Article 8(5) Limitation on ACS or APS ratings

p. 6

comment

48

comment by: *Belgocontrol*

Possibilities to adapt the licence should be available so that the limitation can be trained of the licence.

It is too much restrictive in open European licence environment to have a limitation written on a licence. ATCOs who have been performing according to their privileges suddenly get stigmatised (the feeling they have). At least an acceptable mean of training to rectify this should be available (mentioned).

response

Accepted

Based on the comments received the previously suggested limitation is deleted.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART A — GENERAL REQUIREMENTS

p. 7

comment

131

comment by: *NATS National Air Traffic Services Limited*

General comment against ANNEX I PART-ATCO REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS

Title is incorrect insofar as the fact that this is AMC/GM is missing, this could result in confusion.

Suggest amending to:

AMC and GM to ANNEX I

PART-ATCO

REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS

response

Accepted

comment

212

comment by: *ATCEUC- Air Traffic Controllers European Unions Coordination*

Attachment [#1](#)

AMC1 ATCO.A.015 (c)(e) new - Provisional Inability**Comment:**

The EASA approach doesn't specify that the notification of provisional inability should constitute the beginning of the provisional inability to provide a safe

response

service and expires in case the provisional inability review body decides otherwise.

This is why **ATCEUC** propose to add AMC1 ATCO.A.015(c).

The EASA approach doesn't include any guidance on the way to proceed. **ATCEUC** agrees on the need to have an AMC about the balanced composition of the Provisional Inability Body and on the possible need of medical and human factors expert's opinions on some issues. This is why **ATCEUC** proposes to add AMC1 ATCO.A.015(e).

AMC1 ATCO.A.015 (c) *new text*

The notification should constitute the beginning of the provisional inability of the licence holder unless the relevant Provisional Inability Review Body decides otherwise.

AMC1 ATCO.A.015(e) *new text*

Provisional Inability Body should have a balanced composition between managerial and air traffic controllers. It may ask for experts opinions on medical and human factors issues.

Not accepted

The proposals concerning the establishment and functioning of Provisional Inability Review Bodies is not accepted. Mandating the establishment of such bodies, even at the level of guidance material, and empowering them with the decision on the declaration and termination of the status of provisional inability creates a significant conflict between the remit of such bodies and of ANSP managers relevant for safety accountability under the management system of the organisation. Moreover, it is not understandable, how any decision of such body could change or undermine the notification of provisional inability by the air traffic controller in question as regard the beginning of the provisional inability status.

comment

213

comment by: *ATCEUC- Air Traffic Controllers European Unions
Coordination*

GM1 – ATCO.A.015 (b)(2) -Provisional Inability

Comment:

The EASA approach should include relevant Guidance Material to different cases of temporary unfitness affecting the exercise of the privileges.

ATCEUC proposal:

GM1 – ATCO.A.015 (b)(2) *new text*

Other similar causes may include but may not be limited to :

- Incident, accident or safety occurrence which led to removal from duty*
- Other kind of temporary decrease of medical fitness*

response *Partially accepted*

GM is now provided on the possible causes leading to provisional inability, issues of decrease in medical fitness, however, have to be dealt with according to the relevant provisions in Part-ATCO.MED.

comment 240

comment by: *Federazione ATM-PP*

Federazione ATM-PP proposal is to add those AMCs and this GM:
AMC1 ATCO.A.015 (c) The notification should constitute the beginning of the provisional inability of the licence holder unless the relevant Provisional Inability Review Body decides otherwise.
AMC1 ATCO.A.015(e) Provisional Inability Body should have a balanced composition between managerial and air traffic controllers. It may ask for experts opinions on medical and human factors issues.
GM1 PROVISIONAL INABILITY – ATCO.A.015 (b)(2)
Other similar causes may include but may not be limited to :
- Incident, accident or safety occurrence which led to removal from duty
- Other kind of temporary decrease of medical fitness
 The EASA approach doesn't include any guidance on the way to proceed. Federazione ATM-PP agrees on the need to have an AMC about the balanced composition of the Provisional Inability Body and on the possible need of medical and human factors expert's opinions on some issues. This is why we propose to add AMC1 ATCO.A.015(e).

response *Partially accepted*

The proposals concerning the establishment and functioning of Provisional Inability Review Bodies (or similar) is not accepted. Mandating the establishment of such bodies, even at the level of guidance material, and empowering them with the decision on the declaration and termination of the status of provisional inability creates a significant conflict between the remit of such bodies and of ANSP managers relevant for safety accountability under the management system of the organisation. Moreover, it is not understandable, how any decision of such body could change or undermine the notification of provisional inability by the air traffic controller in question as regard the beginning of the provisional inability status.
 GM is now provided on the possible causes leading to provisional inability. Issues of decrease in medical fitness, however, have to be dealt with according to the relevant provisions in Part-ATCO.MED.

comment 241

comment by: *USCA*

Addition of **AMC1 ATCO.A.015(e)**.
 The EASA approach misses the meaning of this concept and its link to Just Culture. ATCEUC and ETF agree on the importance to avoid punishment to the Provisional Inability declaration. When ATCOs are allowed not to exercise the privileges of their licence because an external factor is threatening their behaviour we are promoting an environment where safety is a common goal.
Provisional Inability Body should have a balanced composition between

response

managerial and air traffic controllers. It may ask for experts opinions on medical and human factors issues.

Not accepted

The proposals concerning the establishment and functioning of Provisional Inability Review Bodies is not accepted. Mandating the establishment of such bodies, even at the level of guidance material, and empowering them with the decision on the declaration and termination of the status of provisional inability creates a significant conflict between the remit of such bodies and of ANSP managers relevant for safety accountability under the management system of the organisation. Moreover, it is not understandable, how any decision of such body could change or undermine the notification of provisional inability by the air traffic controller in question as regard the beginning of the provisional inability status.

comment

242

comment by: USCA

Addition of **AMC1 ATCO.A.015 (c)**

The EASA approach should include relevant Guidance Material to different cases of temporary unfitness affecting the exercise of the privileges

The notification should constitute the beginning of the provisional inability of the licence holder unless the relevant Provisional Inability Review Body decides otherwise.

response

Partially accepted

GM is now provided on the possible causes leading to provisional inability. Issues of decrease in medical fitness, however, have to be dealt with according to the relevant provisions in Part-ATCO.MED.

comment

243

comment by: USCA

GM1 – ATCO.A.015 (b)(2)

The EASA approach should include relevant Guidance Material to different cases of temporary unfitness affecting the exercise of the privileges

Other similar causes may include but may not be limited to :
- Incident, accident or safety occurrence which led to removal from duty
- Other kind of temporary decrease of medical fitness

response

Partially accepted

GM is now provided on the possible causes leading to provisional inability. Issues of decrease in medical fitness, however, have to be dealt with according to the relevant provisions in Part-ATCO.MED.

CONTROLLERS, SUBPART B – LICENCES, RATINGS AND ENDORSEMENTS
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comment	132	comment by: NATS National Air Traffic Services Limited
	<p>General comment, an example is given AMC1 ATCO.B.001(d) Assessment of previous competence The EASA convention in previously published rules is for the title of the IR to be given and the sub topic identified in the line below in capitals. This issue applies to the majority of AMC and GM. Amend example to: 'AMC1 ATCO.B.001(d) Student air traffic controller licence ASSESSMENT OF PREVIOUS COMPETENCE'</p>	
response	Accepted	

comment	244	comment by: USCA
	<p>GM1 ATCO.B.001 Apart from the fact that lower education requirements would downgrade the profession, USCA also thinks that higher education adds value to the ANSP that employs better qualified staff. Furthermore, the technological developments shifting the ATC service into a more high-tech job obviously requires more educated employees. Finally we understand that Option A goes against the meaning of the Basic Regulation sentence where it is said that "ATCOs and student ATCOs shall be sufficiently mature educationally, physically and mentally..."</p> <p>USCA strongly recommends higher education whenever possible. GM1 ATCO.B.001 <i>"Applicants for the issue of a student air traffic controller licence shall hold at least a diploma granting access to university or equivalent. However, higher education should be considered as a guarantee of better fulfilling the requirements and the challenges of the job."</i></p>	
response	<p>Partially accepted</p> <p>As regards to the proposals given, option A is chosen. The Agency believes there is no need to include any GM specific to the educational background of air traffic controllers, since the implementing rule does not detail elements related to education. However, GM in general on the maturity of air traffic controllers is proposed. This approach does not undermine the relevant essential requirement stating that a person undertaking training as an air traffic controller or a student air traffic controller shall be sufficiently mature educationally. On the contrary, with the proposed associated GM covering persons wishing to undertake training, this important subject is finally placed into the appropriate framework.</p>	

comment	247	comment by: USCA
	<p>AMC1 ATCO.B.015(e) USCA proposes to include an AMC to clarify what is the assessment of previous competence in the rating endorsement as it was made for the ratings. <i>"When establishing previous competence in a rating endorsement the assessment should be based on the requirements set out in Part-ATCO, Subpart D, Section 2"</i></p>	
response	<p><i>Not accepted</i></p> <p>The referred provision has been removed from the IR part, so the comment cannot be taken into consideration.</p>	

**ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B — LICENCES, RATINGS AND ENDORSEMENTS —
AMC1 ATCO.B.025(a)(1) Validity of the unit endorsement**

p. 7

comment	40	comment by: skyguide Corporate Regulation Management
	<p>AMC1 ATCO.B.025(a)(1) ... If the ATC unit is proposing to increase the validity time of the unit endorsement, sufficient assurance should be given that the level of safety is maintained. a safety assessment should be conducted... There should also be the possibility to conduct one safety assessment for several units as the issues may be the same. However, as the CA will be approving the CS, and we do not wish to have safety assessments imposed on training issues, we propose this wording.</p>	
response	<p><i>Not accepted</i></p> <p>Based on the opinions and comments, the Agency believes a safety assessment is necessary and, therefore, does not accept the proposal for rewording. The proposed text does not prevent from developing a safety assessment for several units.</p>	

comment	109	comment by: DFS Deutsche Flugsicherung GmbH
	<p>AMC1 ATCO.B.025 (a) (1) As a general principle the maximum validity period of a unit endorsement shall be 3 years. The implementation of a competency scheme with a 3 year cycle is best practice and therefore shall be possible without additional safety assessment. Proposal for change/addition of last paragraph: If the ATC unit is proposing to increase the validity time of the unit endorsement to more than 36 months a safety assessment should be conducted.</p>	

response *Not accepted*

The maximum period of validity for the unit endorsement is proposed to be 3 years. The Agency does not consider the possibility to increase this validity period. While the Agency agrees with the fact that a three year assessment cycle is possible today, the validity of the unit endorsement today is set at 12 months. Therefore, and to change from the existing situation to a possibly longer validity period, additional means are considered necessary to ensure the continuous competence of the air traffic controllers.

comment 260

comment by: USAC-CGT

This safety assessment can be conducted for several units at once.

response *Accepted*

comment 322

comment by: NATS National Air Traffic Services Limited

AMC1 ATCO.B.025(a)(1) Validity of the unit endorsement
Given that the related IR refers to ATCO.B.020(c) it is not clear how this AMC satisfies the related IR. It reads more as narrative (GM) than AMC e.g. "...elements such as.." seems general and non-complete.
There is a lack of clarity, we suggest rewording to be developed to suit AMC.

response *Accepted*

The AMC is placed associated to ATCO.B.020(e), which corresponds to the previous ATCO.B.020(c).
The text is revised as suggested.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B — LICENCES, RATINGS AND ENDORSEMENTS — AMC1 ATCO.B.025(a)(6) Assessment of practical skills

p. 7-9

comment 15

comment by: LFV

Ref AMC1 ATCO.B.025(a)(6)
The whole content has more of examples and does not seem to be harmonised with the full process of assessments. Suggests transfer to Guideline Material.

response *Accepted*

comment 39 comment by: skyguide Corporate Regulation Management

AMC1 GM ATCO.B.025(a)(6)

Move to GM.

This material should be GM as it is too prescriptive and does not read as AMC (it contains examples) reinforces some aspects of the assessments, but not a harmonised vision of the whole process.

(e) dedicated practical assessment

...

To conduct a dedicated practical assessment the assessor(s) should sit with the air traffic controller with the purpose of assessing, ~~under normal operational conditions~~ the operational performance compared to the standard of the air

traffic control service expected ~~at an ATC unit working position or in a synthetic training device~~. As a general principle, practical skills assessments shall be allowed in operational conditions or by using STD (simulators). Assessments in STD are best practice in industry and allow to create comparable assessment conditions for a specific ATC unit including emergency and abnormal situations.

response *Partially accepted*

The text is changed into GM.

Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.

Therefore, the Agency believes that no change to the proposed text is needed.

comment 66 comment by: DSNA

AMC1 ATCO.B.025(a)(6).

Comment :

It is essential to let the ANSP enough flexibility to apply efficiently the new requirements.

Concerning the assessment of practical skills, the possibility offered in AMC to perform the assessments on continuous assessments is an interesting option, that corresponds to best practises in numerous ANSP.

Another interesting option, more realistic and less expensive, would be to have the possibility to perform the assessment of practical skills on STD. This possibility should only be offered for revalidation of a unit endorsement, and not for the initial issue of a unit endorsement.

We believe that the assessment of practical skills for the purpose of revalidating a unit endorsement, should not necessary be the same as the assessment of practical skills for the first issue of this unit endorsement.

In DSNA, the current situation is :

- . For the first issue of a unit endorsement, the assessment of practical skills is done through a number of dedicated tests in live operations.

- . For revalidation of the unit endorsements, the competence assessment is done through the refresher training, one component of which is simulation sessions.

Together, with an existing process to put in doubt ATCO competences, this organisation allows to achieve the required level of safety, avoiding costs and

constraints induced by the proposed regulation.

Proposal :

Add in AMC or GM : **"Only for the purpose of revalidating a unit endorsement, the assessment may be conducted on STD."**

response *Not accepted*

Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.

The assessment is part of the OJT training phase, which leads to the grant of a unit endorsement. In order to fulfil the provisions of ATCO.D.005 (2) (ii), this training phase is entirely developed in a live traffic situation.

Therefore, the Agency believes that there is no need for further provisions to this regard.

comment 141

comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC1 ATCO.B.025(a)(6) Assessment of practical skills	The possibility to conduct an assessment in simulator is necessary. This may even be beneficial/necessary for safety should the assessment need to be carried out on a infrequently used sector where opening the sector for the sole purpose of assessing the ATCO's skills may be counterproductive.	Include text: The assessment may be conducted on a simulator for those aspects that are not readily encountered in the live operational environment.

response *Not accepted*

Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.

Therefore, the Agency believes that no change to the proposed text is needed.

comment 166

comment by: *CANSO Civil Air Navigation Services Organization*

CANSO considers that AMC1 ATCO.B.025 (a) (6) should be moved to GM as it is too prescriptive and does not read as AMC (it contains examples, for example) and appears to highlight certain aspects of the assessments, but not a harmonised vision of the whole process.

response *Accepted*

comment 192

comment by: *FABEC*

FABEC proposes to change AMC1 ATCO.B.025(a)(6) as follows.

As a general principle, practical skills assessments shall be allowed in operational conditions or by using STD (simulators). Assessments in STD are best practice in industry and allow to create comparable assessment conditions for a specific ATC unit including emergency and abnormal situations.

(e) dedicated practical assessment

...

To conduct a dedicated practical assessment the assessor(s) should sit with the air traffic controller with the purpose of assessing, ~~under normal operational conditions~~ the operational performance compared to the standard of the air traffic control service expected ~~at an ATC unit working position or in a synthetic training device~~

response *Not accepted*

Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.

Therefore, the Agency believes that no change to the proposed text is needed.

comment 199

comment by: *AESA / DSANA*

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
<u>AMC1</u> <u>ATCO.B.025(a)(6)</u> <u>Assessment of</u> <u>practical skills</u>	<u>AMC1 ATCO.B.025(a)(6)</u> <u>Assessment of practical skills</u> (a) Assessment of <u>practical</u> skills may have one or more components.	The definition of assessment already states that the type of skills are practical

~~(b) One component should be a practical assessment; other components may be oral examinations and/or written examinations.~~

(c) ~~Practical assessments~~ should be conducted as continuous assessment or dedicated ~~practical assessment(s)~~.

(d) Continuous assessment
Continuous assessment should be achieved by the competence assessor assessing, during normal operational duties, the operational performance compared to the standard of the air traffic control service expected.

Where the assessor has not been able to adequately assess the air traffic controller by continuous assessment, he/she should not certify the air traffic controller's competence until a dedicated ~~practical~~ assessment has been conducted.

(e) Dedicated ~~practical~~ assessment

A dedicated ~~practical~~ assessment may consist of a single assessment or a series of assessments.

To conduct a dedicated ~~practical~~ assessment the assessor(s) should sit with the air traffic controller with the purpose of assessing, under normal operational conditions, the operational performance compared to the standard of the air traffic control service expected.

The air traffic controller concerned should be advised that a dedicated ~~practical~~ assessment is to be conducted and be briefed on the conduct of the assessment.

response *Partially accepted*

The text is revised to remove the references to assessments of *practical skills* due to the fact that this is already included in the definition of assessment. However, the assessments do not necessary have to be performed in a practical manner, but also through test or oral examination.

comment 200

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM2 ATCO.B.025(a)(6) Assessment of practical skills	<u>GM2 ATCO.B.025(a)(6) Assessment of practical skills</u> Assessment of —practical skills should be adapted to the validity time of the unit endorsement of the ATC unit.	The definition of assessment already states that the type of skills are practical

response *Accepted*

comment 266

comment by: USAC-CGT

With this AMC, it's unclear whether the assessment of practical skills for unit endorsement holders can be conducted on simulator. USAC-CGT encourages EASA to mention that it is possible.

response *Not accepted*

The assessment is part of the OJT training phase, which leads to the grant of a unit endorsement. In order to fulfil the provisions of ATCO.D.005 (2) (ii), this training phase is entirely developed in a live traffic situation. Therefore, the Agency believes that there is no need for further provisions to this regard.

comment 277

comment by: HungaroControl

AMC1 GM ATCO.B.025(a)(6) Assessment of practical skills:
Move to GM
This AMC should be GM as it is very detailed as AMC.

response	Accepted	
comment	283	comment by: EUROCONTROL
	GM1 ATCO.B.025 (a) (6), first paragraph: should start with: <i>The oral examinations should be used...</i>	
response	Partially accepted	
	The text is revised to correct the grammatical mistake.	
comment	307	comment by: NATS National Air Traffic Services Limited
	AMC1 ATCO.B.025(a)(6) Assessment of practical skills This AMC should be GM as it is too prescriptive and does not read as AMC (it contains examples, for example) and appears to highlight certain aspects of the assessments, but not a harmonised vision of the whole process.	
response	Accepted	
comment	308	comment by: NATS National Air Traffic Services Limited
	AMC1 ATCO.B.025(a)(6) Assessment of practical skills The possibility to conduct an assessment in an STD is necessary. This may even be beneficial to safety should the assessment need to be carried out on a infrequently used sector where opening the sector for the sole purpose of assessing the ATCO's skills may be counterproductive. However, some assessments should be carried out in live operations. Suggest the text reads "The assessment may be conducted on STD for those aspects that are not frequently encountered in a live operational environment"	
response	Not accepted	
	Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.	
comment	332	comment by: ENAV
	AMC1 GM ATCO.B.025(a)(6) Assessment of practical skills Move to GM Comment: This AMC should be GM as it is too prescriptive and does not read as AMC (it contains examples, for example) and appears to highlight certain aspects of the assessments, but not a harmonised vision of the whole process.	

response *Accepted*

comment 333

comment by: ENAV

~~AMC1~~ or GM ATCO.B.025(a)(6) Assessment of practical skills

The assessment may be conducted on STD for those aspects that are not frequently encountered in a live operational environment

Comment: The possibility to conduct an assessment in an STD is necessary. This may even be beneficial to safety should the assessment need to be carried out on a infrequently used sector where opening the sector for the sole purpose of assessing the ATCO's skills may be counterproductive. However, some assessments should be carried out in live operations.

response *Not accepted*

Paragraph (e) 'dedicated practical assessments' of the proposed GM material already includes the possibility to supplement the assessment with a synthetic training device.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B – LICENCES, RATINGS AND ENDORSEMENTS – GM1 ATCO.B.025(a)(10) Examinations and assessments during refresher and conversion training

p. 9

comment 201

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.B.025(a)(10) Examinations and assessments during refresher and conversion training	(a) Assessments of practical skills should be conducted primarily on a synthetic training device or offline environments.	The definition of assessment already states that the type of skills are practical

response *Accepted*

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B – LICENCES, RATINGS AND ENDORSEMENTS –

p. 9

AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments

comment 2

comment by: Aaron Curtis Prospect ATCOs' Branch UK

AMC1 ATCO.B.025(a) (14) The minimum number of hours for OJTI competency and the minimum number of assessments for an assessor to perform in order to retain these competencies seems very arbitrary. We would question how these figures have been arrived at and what evidence was used to support the figures. It doesn't seem to take in to account different units which will have very different levels of complexity and traffic. There are many examples where it is unreasonable and impossible to achieve this. We would suggest that the minimum requirements be set by the provider and listed in the competence scheme. This would be approved by the competent authority by virtue of the whole scheme being so approved. This would also be consistent with ATCO.B.025 (a) (3) which makes provision for the minimum number of hours to maintain competency to be determined by the provider.

response Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 13

comment by: LFV

AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments
The minimum number of OJTI instruction hours is far too strict and should instead be developed in dialog with the CA. It is probably less a problem at big units across Europe, but can constitute a major obstacles for hundreds of smaller ATS units across Europe, with few ATCOs and where there are seldom inflow of new trainees. To stipulate a minimum number of instructional hours may not be the only means to cater for quality and safety of an OJTI.

response Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 26

comment by: LPS SR

**AMC1
ATCO.B.025(a)(14)
Minimum number of**

In order to maintain their
competence connected to the
respective licence

Stipulating the
number of hours and
assessments is not

OJT instruction hours and assessments

endorsement(s) OJTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These values should be defined in the UCS.

flexible in regard of specific units and its size and complexity. Numbers will be defined in Unit Competence Scheme, which is approved by CAA.

response *Accepted*

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 38

comment by: skyguide Corporate Regulation Management

AMC1 ATCO.B.025(a)(14)

In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These values should be defined in the UCS.

Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA).

response *Accepted*

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 46

comment by: Federazione ATM-PP

Federazione ATM-PP suggest to delete AMC1 ATCO.B.025(a)(14): ~~"In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year."~~

We think OJT is a technique, once you learn it, you never forget.

Moreover, there is plenty of small units where no OJT can be provided for large amount of time.

Regarding the assessor, our position is the same, once you learn to assess on

response

an endorsement you have, the only important thing is maintain the endorsement "live". Same problems of the OJT in small units

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

71

comment by: *DSNA*

AMC1 ATCO.B.025 (a) (14).

See general comment #331 point 3 and comments # 351 and 354.

For consistency with these comments, **AMC1 ATCO.B.025(a)(14)** should be deleted.

Even in the case where comments # 351 and 354 would be rejected, **AMC1 ATCO.B.025 (a) (14)** should be modified because it is too inflexible. These minimum numbers should be determined by the units and defined in the unit competence scheme, submitted to approval of the competent authority.

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

79

comment by: *CAA-NL*

[AMC1 ATCO.B.025 \(a\)\(14\)](#)

Comments: Under AMC it is indicated that: "... OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year."

JUSTIFICATION: Both 50 hours instruction and 5 assessments a year seem too strict and would not always be suitable to the size of specific units.

ALTERNATIVE PROPOSAL: Leave it up to the responsibility of the ANSP to define minimum number of OJT shifts instead of hours and offer the opportunity to revalidate the OJT endorsement with an OJT assessment. (already covered by ATCOC.020 probably).

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment	<p data-bbox="355 210 391 246">91</p> <p data-bbox="989 210 1444 246">comment by: DSAC - French NSA</p> <p data-bbox="355 302 494 331"><u>Paragraph</u></p> <p data-bbox="355 331 715 362">AMC1 ATCO.B.025 (a)(14)</p> <p data-bbox="355 362 630 394"><u>Alternative proposal</u></p> <p data-bbox="355 394 1444 492">In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year.</p> <p data-bbox="355 492 518 524"><u>Justification</u></p> <p data-bbox="355 524 1444 940"> - In basic regulation n°216/2008, "(ii) Instruction on practical skills shall be given by appropriately qualified instructors, who have the following qualifications:[...] iv. receive regular refresher training to ensure that the instructional competences are maintained. » The revalidation of the OJTI endorsement should then be only related to a refresher training. - In basic regulation n°216/2008, (i) Persons responsible for assessing the skill of air traffic controllers shall: ii. receive regular refresher training to ensure that the assessment standards are maintained up to date. » The revalidation of the assessor endorsement should then be only related to a refresher training. </p>
response	<p data-bbox="355 967 478 996"><i>Accepted</i></p> <p data-bbox="355 1052 1444 1146">Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>
comment	<p data-bbox="355 1238 391 1274">95</p> <p data-bbox="890 1238 1444 1274">comment by: Juan Gallego Grana - Aena</p> <p data-bbox="355 1328 742 1359">AMC1 ATCO.B.025(a)(14)</p> <p data-bbox="355 1359 1444 1552">Stipulating in AMC1 the number of hours and assessments is too inflexible and does not allow for the different units/sizes/complexities to define these numbers according to their needs and best practices. The requirement of that an assessor should conduct a minimum of 5 assessments per year is unfeasible in small units with a reduced number of ATCOs. It is proposed to modify AMC1 ATCO.B.025(a)(14) as follows:</p> <p data-bbox="355 1552 1444 1713"><i>"In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These minimum numbers of hours should be defined in the unit competence scheme".</i></p>
response	<p data-bbox="355 1736 478 1765"><i>Accepted</i></p> <p data-bbox="355 1821 1444 1915">Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment 113 comment by: DFS Deutsche Flugsicherung GmbH

AMC1 ATCO.B.025 (a) (14)

These limiting figures can impossibly be obtained due to an irregular and only limited need of new personnel especially at small units (where a Tower unit – even sized like Frankfurt – is regarded as being small). With these limits, the possibility to choose between minimum evidence of hours and a competence assessment is not existent for small units.

In order to prevent a substantially unequal treatment we recommend to remove the AMC and leave the obligation with the units to make an appropriate determination in the UCS and give limiting values only at the level of GM.

response Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 142 comment by: Maastricht UAC Training Organisation

**Paragraph
identification:**

Justification:

Alternative proposal:

**AMC1
ATCO.B.025(a)(14)**
Minimum number of
OJT instruction hours
and assessments

Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define, in the UCS, these numbers according to their needs and best practices and the limit will be approved by the competent authority.

Proposed text: In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of ~~of 50~~ hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These values should be defined in the UCS.

response Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is

deleted.

comment 164

comment by: *CANSO Civil Air Navigation Services Organization*

CANSO proposes the following change to AMC1 ATCO.B.025 (a) (14):
In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These values should be defined in the UCS.
 Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)

response *Accepted*

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment 190

comment by: *FABEC*

FABEC request to delete AMC1 ATCO.B.025(a)(14).
ATCO.C.020 and ATCO.C.060 refer to unit competence scheme to define currency requirements for OJTI and assessors. Such requirements are outside the scope of BR.
~~OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year.~~

response *Accepted*

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted. AMC is deleted.

comment 196

comment by: *UK CAA*

Page No: 9

Paragraph No: AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments

Comment: The title "Minimum number of OJT instruction hours and assessments" when read with its related paragraph could cause confusion, particularly in the UK, over its applicability to either the holder of an Assessor endorsement or an OJTI Assessor for the purposes of a Unit Training Plan (UTP).

	<p>Justification: Clarification and the removal of possible misinterpretation. Proposed Text: Title to read "Minimum number of OJTI instruction hours and assessments for the holders of an Assessor endorsement."</p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>214 comment by: <i>ATCEUC- Air Traffic Controllers European Unions Coordination</i></p>
	<p>AMC1 ATCO.B.025(a)(14)</p> <p>Comment:</p> <p>ATCEUC prefers to delete this AMC because there are units where it is impossible to comply with these numbers. Those numbers should be included in the UCS as already stated in the rule.</p> <p>AMC1 ATCO.B.025(a)(14) new text</p> <p><i>In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year.</i></p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>219 comment by: <i>Laurent BERTIN UNSA-ICNA</i></p> <p>to be removed, impossible to implement in some units</p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>226 comment by: <i>DATCA</i></p>
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response

We feel the number of required hours is very difficult to deem, because of the different complexity at different units. To set such a high amount of hours, make it very difficult to comply with

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

227

comment by: *European Transport Workers Federation - ETF*

AMC1 ATCO.B.025(a)(14)

Deletion

ETF proposes deletion because there are units where it is impossible to comply with these numbers. The number should be included in the UCS as stated in ATCO.B.025(a)(14).

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

230

comment by: *SINCTA - Portuguese Air Traffic Controllers' Union*

AMC1 ATCO.B.025(a)(14)

SINCTA prefers to delete this AMC because there are units where it is impossible to comply with these numbers. The number should be included in the UCS as stated in ATCO.B.025(a)(14).

Proposed text:

~~In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year.~~

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

250

comment by: *USCA*

MINIMUM HOURS OF INSTRUCTION – AMC1 ATCO.B.025(a)(14)

USCA proposes to delete this paragraph because there are units where it is impossible to comply with these numbers. Each unit should be allowed to define

	<p>these numbers according to their needs and best practices (which will be approved by the CA)</p> <p>"In order to maintain their competence connected to the respective licence endorsement(s) OTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year. These values should be defined in the UCS"</p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>264 comment by: USAC-CGT</p> <p>This AMC shall be deleted : nothing comes to justify the figures provided and making a safety case to prove that lower figures are ok is very difficult if not impossible. These figures are not realistic in all units.</p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>269 comment by: Belgocontrol Training Centre</p> <p>Fixing the number of hours and assessments is too rigid and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)</p>
response	<p><i>Accepted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.</p>

comment	<p>271 comment by: Finnish Air Traffic Controllers Association</p> <p>It is essential to keep standards as high as possible, so the Finnish Air Traffic Controllers Association sustain these minimum hours and assessments.</p>
response	<p><i>Noted</i></p> <p>Based on the comments on the revalidation of the instructor and assessor</p>

endorsements the related implementing rule provision and the subject AMC is deleted.

comment

275

comment by: HungaroControl

AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments:

In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of ~~50~~ hours of instruction per year, an assessor should conduct a minimum number of ~~5~~ assessments per year. **These values should be defined in the UCS.**

The unit should define the numbers according to their size and training needs.

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

278

comment by: comments provided on behalf of FIT/CISL italian trade union

FIT/CISL proposes to delete it because especially in the smaller units is impossible to comply with these numbers. The number should be included in the UCS as stated in ATCO.B.025(a)(14).

We proposes:

~~"In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum of 50 hours of instruction per year, an assessor should conduct a minimum of 5 assessments per year."~~

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

305

comment by: NATS National Air Traffic Services Limited

AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments

Stipulating the number of hours and assessments is too inflexible and does not allow for the different units/sizes/complexities. Each unit should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)

Suggested text: In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of hours of instruction per year, an assessor should conduct a minimum number of

response

assessments per year. These values should be defined in the UCS.

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

comment

343

comment by: ENAV

AMC1 ATCO.B.025(a)(14) Minimum number of OJT instruction hours and assessments

In order to maintain their competence connected to the respective licence endorsement(s) OJTIs should perform a minimum number of 50 hours of instruction per year, an assessor should conduct a minimum number of 5 assessments per year. These values should be defined in the UCS.

Comment: Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)

response

Accepted

Based on the comments on the revalidation of the instructor and assessor endorsements the related implementing rule provision and the subject AMC is deleted.

**ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B — LICENCES, RATINGS AND ENDORSEMENTS —
AMC1 ATCO.B.040 General**

p. 9-10

comment

4

comment by: LfV

Ref AMC2 ATCO.B040 Assessment (a)

It is recommended to replace "be subdivided into" with "comprise", since the three listed items could also be tested together, depending on the structure of the test. An interactive test situation with all three elements incorporated could very well be proven as the optimal solution to assess the command of language.

response

Accepted

comment

5

comment by: LfV

response	Ref AMC2 ATCO.B.40 Assessment (b) Phraseology is not assessed in the language assessment but in the UCS.
	<i>Accepted</i>

comment	6	comment by: LfV
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response	Ref AMC2 ATCO.B.040 Assessment (c) Suggest deletion of (c) since the method is to be approved by the CA.
	<i>Not accepted</i> The Agency considers that the proposed provision at AMC level, as formulated, provides sufficient room for manoeuvre for implementation, while giving guidance to the necessary level, it is therefore maintained.

comment	7	comment by: LfV
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response	Ref AMC3 ATCO.B.040 Assessors for language proficiency (a) Suggest that only the first sentence is retained which is sufficient to explain the implementing rule (B.040); "It is essential that the person responsible for language proficiency assessment are suitably trained and qualified." The remaining part could be moved to "Guideline Material".
	<i>Accepted</i> The elements on the training and qualification of language proficiency assessors of the original proposal are moved to GM. The requirements on regular refresher training and ensuring objectivity are however kept at AMC level.

comment	8	comment by: LfV
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response	Ref AMC3 ATCO.B.040 Assessors for language proficiency (d) Too stringent requirement on language assessor, however that it is agreed that an assessor should not conduct assessment if his/her objectivity is affected. It could be expressed as follows: "Language proficiency assessors shall not conduct assessments whenever their objectivity may be affected."
	<i>Accepted</i>

comment	41	comment by: skyguide Corporate Regulation Management
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AMC 1 ATCO.B.040 (a)

response

...but with specific focus on language rather than operational procedures and ...
Coherence: This AMC contradicts the requirement in ATCO.B.030 for testing phraseology to a level 4 (which is not possible)

AMC 1 ATCO.B.040 (b)

The assessment should determine the applicant's ability to communicate effectively using visual and non-visual communication in both routine and non-routine situations.

The ATCO needs to be able to communicate effectively in non-visual language, without the non-verbal cues of a face to face situation as they do not see their interlocutor at the other end of the radio or telephone.

Partially accepted

AMC 1 ATCO.B.040(a)

The comment on the assessment of phraseology has been accepted.

AMC 1 ATCO.B.040(b)

LPR is not meant to cover ATCO-pilot communication only. Moreover, pilots are not the only possible and potential interlocutors of air traffic controllers, such as not all communication is undertaken by means of radio or telephone. This is especially true in non-routine situations, with which ATCOs shall also be able to cope with. The AMC level requirement is therefore maintained as originally proposed.

comment

42

comment by: skyguide Corporate Regulation Management

AMC2 ATCO.B.040

~~(a) The assessment should be subdivided into the following three elements, as follows:~~

~~(1) listening — assessment of comprehension;~~

~~(2) speaking — assessment of pronunciation, fluency, structure and vocabulary;~~

~~(3) interaction.~~

~~(b) Phraseology and the switch between phraseology and plain language should be assessed for listening and speaking proficiency.~~

~~(c) When the assessment is not conducted in a face to face situation, it should use appropriate technologies for the assessment of the applicant's abilities in listening and speaking, and for enabling interactions~~

This is a partial copy of ICAO doc 9835, and we suggest that referencing the document itself is more beneficial to the aims of this regulation as this will allow for harmonisation. Copying part of a document bears the risk that certain elements will become out of proportion to others and will be out of context and therefore not properly applied.

AMC2 ATCO.B.040 (b)

~~Phraseology and~~ The switch between phraseology and plain language should be assessed for listening and speaking proficiency

The language proficiency test does not test phraseology, but plain language. Phraseology is tested in the UCS.

AMC2 ATCO.B.040 (c)

~~When the assessment is not conducted in a face to face situation, it should use appropriate technologies for the assessment of the applicant's abilities in listening and speaking, and for enabling interactions~~

The CA has to approve the assessment method, therefore, should also be

response

looking at best practices. We suggest removing this provision.

Partially accepted

AMC2 ATCO.B.040

The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.

AMC2 ATCO.B.040(b)

Accepted.

AMC2 ATCO.B.040(c)

Not accepted. The Agency considers that the proposed provision at AMC level, as formulated, provides sufficient room for manoeuvre for implementation, while giving guidance to the necessary level.

comment

43

comment by: *skyguide Corporate Regulation Management*

AMC3 ATCO.B.040 (a)

It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. ~~They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.~~

The BR 216 is covered with the first sentence. The rest of the text is outside the scope and AMC should not consist of preferred methods. If necessary, the last sentence could be moved to GM.

AMC3 ATCO.B.040 (d)

~~Language proficiency assessors should not assess applicants to whom they have given language training since their preceding assessment~~

Language proficiency assessors shall not conduct assessments whenever their objectivity may be affected. The requirement for language proficiency assessors is more demanding than for operational (ATCO) assessors. We therefore suggest to re-word.

response

Accepted

The elements on the training and qualification of language proficiency assessors of the original proposal are moved to GM. The requirements on regular refresher training and ensuring objectivity are however kept at AMC level. The text for the latter provision is amended.

comment 72

comment by: DSNA

AMC2 ATCO.B.040.Comment :

We would like to add in this article the possibility to perform language proficiency assessments through continuous training.

We believe that the best way to develop language proficiency is a system combining practice and training. So we developed a system called "PIFA" to meet the language proficiency requirements for ATCOs, based on continuous training.

It seems to us that such a system is more reliable than performing tests every 3 years. A test only reflects the level of language proficiency at a given moment, whereas our system guarantees a minimum level 4, in a continuous way.

Short description of the PIFA system:

To enter the continuous training program, a formal assessment is required to demonstrate the minimum level 4, leading to the first issue of the language proficiency endorsement.

Then, for each ATCO, an individual professional english training program is developed based on the assessed individual needs of the ATCO.

The training program is mandatory, it can include different training actions like individual lessons, lessons in small groups, immersion course in an English-speaking country....

As required in ICAO doc. 9835, language training is only given by appropriately and adequately qualified teachers.

During the whole program, the level is monitored. At the end of the program, there is a final interview with a linguist. If the program has been adequately followed, the endorsement is revalidated and the training program for the next 3-years period is defined.

The whole process was approved by french CA, and a national regulatory framework was developed to describe the process and tackle the possible non standard cases.

The main strength of this system is that it is based on individual needs of each ATCO. It allows them to maintain or improve their English level.

This system gives very good results, as no safety occurrence related to language proficiency is reported. We consider that it is a safe and efficient system, ensuring competency development and continuous availability of adequately trained staff.

Proposal :

We suggest to add an AMC or GM:

(d) **Assessment of language proficiency may be performed by continuous assessment through language training.**

(which is consistent with ATCO.D.090)

response *Not accepted*

According to ICAO Annex 1, 1.2.9.6, the language proficiency of air traffic controllers should be formally evaluated at intervals in accordance with the demonstrated proficiency level. The same approach is taken in the EU

legislation. Therefore the Agency concludes that continuous training, which is acknowledged as a good tool to maintain the required level of proficiency, cannot substitute the required formal assessments at regular intervals. Continuous training as a suitable tool for maintaining the required level of language proficiency is now explicitly mentioned in the AMC material on language training.

comment

73

comment by: DSNA

AMC3 ATCO.B.040 (d).Comment :

This condition is too stringent, and not adapted to the reality of the practices. It is more demanding than what is proposed for assessment of practical skills. Concerning practical skills, it is commonly admitted that an assessor may have participated to the training of the ATCO he is assessing. It should be at least the same for language proficiency. Assessors for language proficiency may have participated to the training, provided that it doesn't affect their objectivity.

Proposal :

d) Language proficiency assessors should not conduct assessments whenever their objectivity may be affected

response

Accepted

comment

80

comment by: CAA-NL

AMC2 to ATCO.B.040 (b) - Language proficiency endorsement

COMMENTS: According to ICAO Doc. 9835, phraseology is not part of a language proficiency checks.

JUSTIFICATION: This is for a reason - being able to apply the standard phraseology is part of the practical skills and not language proficiency

ALTERNATIVE PROPOSAL: The switch between phraseology and plain language should be assessed for listening and speaking proficiency

response

Accepted

comment

81

comment by: CAA-NL

AMC1 ATCO.B.040 (b)

COMMENTS: AMC1 (b): Visual communication is not relevant for ATCO-pilot communication and only applicable in the OPS-room where colleagues directly communicate face-to-face; present RMIT-method is not able to determine visual communication ; In general we conclude there is too much detail in the AMC's.

JUSTIFICATION:

response	<p>ALTERNATIVE PROPOSAL: delete the details.</p> <p><i>Not accepted</i></p> <p>LPR is not meant to cover ATCO-pilot communication only. Moreover, pilots are not the only possible and potential interlocutors of air traffic controllers, such as not all communication is undertaken by means of radio or telephone. This is especially true in non-routine situations, with which ATCOs shall also be able to cope with. The AMC level requirement is therefore maintained as originally proposed.</p>
comment	<p>92 comment by: DSAC - French NSA</p> <p><u>Paragraph</u> AMC1 ATCO.B.040 <u>Comment</u> An assessment method regarding the language endorsement could be based on continuous assessment linked with a language training to ensure that level 4 is maintained by the ATCOs. A system combining language training and continuous assessment will provide on an individual basis for each ATCO the means to define and monitor that a level 4 is maintained by the ATCO. This system ensures that all 6 criterias of the ICAO scale are met in different situation relevant to the professional environment. This system used for French ATCOs and approved by the French NSA has not led to safety event related to the linguistic level of the ATCOs.</p>
response	<p><i>Not accepted</i></p> <p>According to ICAO Annex 1, 1.2.9.6, the language proficiency of air traffic controllers should be formally evaluated at intervals in accordance with the demonstrated proficiency level. The same approach is taken in the EU legislation. Therefore the Agency concludes that continuous training, which is acknowledged as a good tool to maintain the required level of proficiency, cannot substitute the required formal assessments at regular intervals. Continuous training as a suitable tool for maintaining the required level of language proficiency is now explicitly mentioned in the AMC material on language training.</p>
comment	<p>106 comment by: ENAC-FRANCE</p> <p>AMC2 ATCO.B.040 Assessment (a) The assessment should be subdivided into the following three elements, as follows: (1) listening — assessment of comprehension; (2) speaking — assessment of pronunciation, fluency, structure and vocabulary; (3) interaction. <u>Comment:</u> Structure of the assessment:</p>

	<p>The assessment method should allow assessing the three items, listening, speaking and interaction, but it shouldn't be necessarily divided in three parts devoted to one of these items.</p> <p>Let the CA approve the assessment method.</p> <p>Separate Listening Section</p> <p><i>While there is common agreement that Listening and Expression should be tested, having two separate tests is only one possible test configuration. Indeed Doc 9835 seems to indicate that testing Listening separately is tolerated but not the only, nor necessarily the best, solution as it eliminates the essential element of interaction:</i></p> <p><i>(N.B. Please note the conditional rather than the imperative.)</i></p> <p>6.3.2.6 If comprehension is assessed through a specific listening section with individual items, it should not be done to the detriment of assessing interaction. Doc 9835.</p> <p><u>Proposal:</u></p> <p>AMC2 ATCO.B.040 Assessment</p> <p>(a) The assessment should comprise be subdivided into the following three elements, as follows:</p> <p>(1) listening — assessment of comprehension;</p> <p>(2) speaking — assessment of pronunciation, fluency, structure and vocabulary;</p> <p>(3) interaction.</p>
response	Accepted

comment	<p>107</p> <p>comment by: ENAC-FRANCE</p> <p>AMC2 ATCO.B.040 Assessment</p> <p>(b) Phraseology and the switch between phraseology and plain language should be assessed for listening and speaking proficiency.</p> <p><u>Comment: To be coherent with comment on ATCO.C030 on phraseology</u></p> <p><i>While the ICAO LPRs have had a wide impact on the use of plain language the impact on the use of phraseology and 'speech transmission techniques' is limited to an increased vigilance concerning the phonological intelligibility of the message.</i></p> <p><i>In Doc 9835 it is written:</i></p> <p>4.5.2 A note in Appendix 1 to Annex 1 states that "The language proficiency requirements are applicable to the use of both phraseologies and plain language."</p> <p>This statement refers <u>only to those characteristics of language use to which ICAO standardized phraseology conforms.</u></p> <p>Appropriate application of the language proficiency requirements to the use of phraseology should include the following criteria:</p> <p>a) pronunciation of phraseology according to ICAO recommended pronunciations as found in Annex 10, Volume II, 5.2.1.4.3, Doc 9342 or otherwise in accordance with the ICAO Operational Level 4 pronunciation descriptor of the Rating Scale;</p> <p>b) using a speech transmitting technique (enunciation, rate of speech, pausing, and speaking volume) in accordance with Doc 9342 or otherwise with the ICAO Operational Level 4 fluency descriptor of the Rating Scale.</p>
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Since speech transmitting techniques are already assessed in the operational environment, the only novelty is to guarantee that pronunciation in English and the local language used for R/T communications is 'intelligible to the aeronautical Community'. There should be no problem integrating the latter in a formal operational assessment.

The recommended pronunciation referred to in 4.5.2 is:

'Operational 4: Pronunciation, stress, rhythm and intonation are influenced by the first language or regional variation, but only sometimes interfere with ease of understanding.

Proficient speakers shall use a dialect or accent which is intelligible to the aeronautical Community'.

Furthermore numerous chapters of Doc 9835 insist on the fact that the testing of plain language and phraseology are completely different issues:

Doc 9835:

6.3.2.8 The test should be specific to aviation operations.

.....

— Additional information. ICAO language provisions require proficiency in the use of standardized

phraseology and in the use of plain language. The assessment of standardized phraseology is an

operational activity, not a language proficiency assessment activity. While an aviation language test

may include phraseology to introduce a discussion topic or make interaction meaningful to the testtaker,

it is important that tests elicit a broad range of plain language and not be limited to tasks that

require standardized phraseology. The focus of a language proficiency test for compliance with ICAO

requirements should be on plain language.

3.2.9 It is acceptable that a test contains a scripted task in which phraseology is included in a prompt, but the

test should not be designed to assess phraseology.

— What it means. An aviation language proficiency test has different aims than a phraseology test.

While an aviation language test can include some phraseology as prompts or scene setters, the

purpose of the test is to assess plain language proficiency in an operational aviation context.

— Why it is important. First, tests of phraseology alone are not suitable for demonstrating compliance

with ICAO language proficiency requirements. Second, using phraseology accurately is an operational

skill which is very dependent on the operational context; and incorrect usage by a test-taker of a

specific phraseology may be an operational error, rather than a language error. Phraseology must be

taught and tested by qualified operational personnel.

And on the ICAO website Faq it is clearly stated:

'Just as testing of ICAO phraseology cannot be used to assess plain language proficiency, neither can English language proficiency tests be used to test ICAO standardized phraseology.'

Comment on Code switching

Code switching is a very complex, universal and insufficiently understood phenomenon.

And it is therefor very difficult to assess in an appropriate manner as there is a

lack of measurable criteria.

There is only one reference to code-switching in ICAO documentation: Doc 9835

Code-switching

3.3.21 Code-switching is a common phenomenon of language use referring to the alternation between two or more languages, dialects or registers in a single conversation (or even a single utterance within a conversation) involving users who have more than one language in common.

Pilots and controllers share two distinct registers of language for the purposes of radiotelephony communications — standardized phraseology and plain language.

Unsurprisingly, code-switching is strongly present in radiotelephony communications, as pilots and controllers make alternating use of standardized phraseology and plain language.

Some of the interfering effects of code-switching can be observed when utterances in standardized phraseology display the undesirable influence of plain language (for example, the use of non-standard vocabulary or the expansion of normally reduced syntactic structures). Plain language may equally sometimes display the influence of phraseology (the deletion of determiners, auxiliary verbs, etc.) in the interest of concision'. Doc 9835

The problem is that there are absolutely NO commonly accepted criteria to determine the extent and nature of this switching or to assess how successful the controller is in his handling of the process.

So the only thing we can say about a given controller's ability to code switch is:

'Yes he does' which is a tautology that doesn't give any indication whatsoever of his underlying language proficiency level.

Until some serious research has been done in this field and some guidelines have been drawn up to define the characteristics of successful code switching in the R/T environment it is foolhardy to include this notion in a licensing regulation.

Proposal:

AMC2 ATCO.B.040 Assessment

~~(b) Phraseology and the switch between phraseology and plain language should be assessed for listening and speaking proficiency.~~

response *Partially accepted*

The text has been amended so that it only refers to the switch between phraseology and plain language.

comment 108

comment by: ENAC-FRANCE

AMC3 ATCO.B.040 Assessors for language proficiency

(d) Language proficiency assessors should not assess applicants to whom they have given language training since their preceding assessment

Comment:

This requirement is more demanding than the requirement concerning assessor of practical skills and therefore unnecessary.

Proposal:

AMC3 ATCO.B.040 Assessors for language proficiency

response

~~(d) Language proficiency assessors should not assess applicants to whom they have given language training since their preceding assessment~~

Partially accepted

The proposal is kept in an amended version in order to be in line with the requirements applicable to assessors.

comment

110

comment by: Maastricht UAC

AMC2
ATCO.B.040(b)

According to ICAO Doc. 9835, phraseology is not part of a language proficiency checks. This is for a reason - being able to apply the standard phraseology is part of the practical skills and not language proficiency

Proposed Text:
~~Phraseology and~~ The switch between phraseology and plain language should be assessed for listening and speaking proficiency

response

Accepted

comment

111

comment by: Maastricht UAC

AMC3
ATCO.B.040(a)
Assessors for language proficiency

AMC should not consist of preferred approaches / methods. The last sentence could be moved to GM.

Proposed text: It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. ~~They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert~~

response

Accepted

comment 138 comment by: Aaron Curtis Prospect ATCOs' Branch UK

AMC3 (a)

Due to the specific technical nature of language used in provision of ANS, a former or current air traffic controller should be on the assessment team. Both this NPA (ATCO.B.030) and ICAO (doc 9835) refer to the requirements that are different to a normal language assessment.

We propose the following change to the article:

It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either ~~aviation specialists (e.g. current or former air traffic controllers)~~, or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.

Delete the strikethrough text from the article.

response Not accepted

While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current or former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.

comment 144 comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC2 ATCO.B.040(b)	According to ICAO Doc. 9835, phraseology is not part of a language proficiency checks. This is for a reason - being able to apply the standard phraseology is part of the practical skills and not language proficiency	Proposed Text: Phraseology and The switch between phraseology and plain language should be assessed for listening and speaking proficiency

response Accepted

comment 145

comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC3 ATCO.B.040(a) Assessors for language proficiency	AMC should not consist of preferred approaches / methods. The last sentence could be moved to GM.	Proposed text: It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert

response Accepted

comment 154

comment by: CANSO Civil Air Navigation Services Organization

CANSO proposes the following change to AMC2 ATCO.B.040 (a)
*The assessment should **comprise** be ~~subdivided into~~ the following three elements, as follows:*
 (1) *listening — assessment of comprehension;*
 (2) *speaking — assessment of pronunciation, fluency, structure and vocabulary;*
 (3) *interaction*
 The test may be subdivided, but these elements may also coexist differently in the test. By replacing subdivided into comprise, we allow for different testing methods without losing the essential elements.

response Accepted

comment 156

comment by: CANSO Civil Air Navigation Services Organization

CANSO proposes to replace the paragraph AMC3 ATCO.B.040 (d):
*Language proficiency assessors should not conduct assessments whenever their **objectivity may be affected***
 This requirement is more stringent than for operational assessors. We suggest

response	<p>to re-word.</p> <p><i>Accepted</i></p>
comment	<p>183 comment by: HungaroControl</p>
response	<p>AMC2 ATCO.B.040 Assessment (a): The assessment should comprise be subdivided into the following three elements, as follows: (1) listening — assessment of comprehension; (2) speaking — assessment of pronunciation, fluency, structure and vocabulary; (3) interaction It allows for different methods.</p> <p><i>Accepted</i></p>
comment	<p>184 comment by: HungaroControl</p>
response	<p>AMC2 ATCO.B.040 Assessment (b): Phraseology and The switch between phraseology and plain language should be assessed for listening and speaking proficiency. The language proficiency test does not test phraseology, but plain language. Phraseology is tested in the CCC/UCS.</p> <p><i>Accepted</i></p>
comment	<p>185 comment by: HungaroControl</p>
response	<p>AMC2 ATCO.B.040 Assessment (c): When the assessment is not conducted in a face to face situation, it should use appropriate technologies for the assessment of the applicant's abilities in listening and speaking, and for enabling interactions. The CA has to approve the assessment method, therefore, should also be looking at best practices.</p> <p><i>Not accepted</i></p> <p>The Agency considers that the proposed provision at AMC level, as formulated, provides sufficient room for manoeuvre for implementation, while giving guidance to the necessary level, it is therefore maintained.</p>
comment	<p>186 comment by: HungaroControl</p>

response

AMC3 ATCO.B.040 Assessors for language proficiency (d):

~~Language proficiency assessors should not assess applicants to whom they have given language training since their preceding assessment~~

Language proficiency assessors should not conduct assessments whenever their objectivity may be affected

Rewording of the sentence is necessary.

Accepted

comment

202

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
AMC1 ATCO.B.040 General	AMC1 ATCO.B.040 General ——— Language requirements	The title "general" does not correspond to the content of the article

response

Accepted

The title of the AMC provision has been amended to ensure better correspondence with the underlying IR provision as well as with its content.

comment

215

comment by: ATCEUC- Air Traffic Controllers European Unions
Coordination**AMC3 ATCO.B.040(a)****Comment:**

A correct language assessment depends also on the specific knowledge of the persons responsible for language proficiency assessment. In this particular case it is important for them to have knowledge in the field.

ATCEUC proposes:

AMC3 ATCO.B.040(a) new text

It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers, or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.

response *Not accepted*

While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current of former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.

comment 223

comment by: *Laurent BERTIN UNSA-ICNA*

AMC3: no need for an assessment team in the french continuing language training system (PIFA).

response *Not accepted*

According to ICAO Annex 1, 1.2.9.6, the language proficiency of air traffic controllers should be formally evaluated at intervals in accordance with the demonstrated proficiency level. The same approach is taken in the EU legislation. Therefore the Agency concludes that continuous training, which is acknowledged as a good tool to maintain the required level of proficiency, cannot substitute the required formal assessments at regular intervals. Continuous training as a suitable tool for maintaining the required level of language proficiency is now explicitly mentioned in the AMC material on language training.

comment 224

comment by: *Federazione ATM-PP*

Federazione ATM-PP proposal is to change AMC3 ATCO.B.040 (a) in the following:

It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either ~~aviation specialists~~ (e.g. current or former air traffic controllers or language specialists with additional aviation-related training). The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.

A correct language assessment depends also on the specific knowledge of the persons responsible for language proficiency assessment. In this particular case it is important for them to have knowledge in the field.

response *Not accepted*

While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current of former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.

comment	228	comment by: <i>European Transport Workers Federation - ETF</i>
	<p>AMC3 ATCO.B.040(a) "It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert."</p> <p>The ATCO language proficiency is about phraseology and plain language (ATCO.B.030). It is also important to underline that it has work related topics which means it is not a regular English test (ICAO doc 9835). In order to comply with these requirements it is important to have current or former air traffic controllers in the assessment team.</p>	
response	<p><i>Not accepted</i></p> <p>While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current or former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.</p>	
comment	231	comment by: <i>SINCTA - Portuguese Air Traffic Controllers' Union</i>
	<p>AMC2 ATCO.B.040(a) SINCTA considers this an important provision where the type of assessment is established. The three elements are essential for the assessment in order to understand in which of them any difficulties could be encountered.</p>	
response	<p><i>Noted</i></p>	
comment	232	comment by: <i>SINCTA - Portuguese Air Traffic Controllers' Union</i>
	<p>AMC3 ATCO.B.040(a) The ATCO language proficiency is about phraseology and plain language (ATCO.B.030). SINCTA also wishes to underline that it is not a regular English test (ICAO doc 9835). In order to comply with these requirements it is important to have current or former air traffic controllers in the assessment team.</p> <p>Proposed text: <i>It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.</i></p>	

response *Not accepted*

While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current of former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.

comment 237

comment by: *swissatca*

AMC2 ATCO.B.040 Assessment (b): Phraseology is not tested in the Language Proficiency test, although it may be part of the test. The Language Proficiency test should test plain language. Phraseology is tested in the UCS.
~~Phraseology and The switch between phraseology and plain language should be assessed for listening and speaking proficiency~~

response *Accepted*

comment 238

comment by: *swissatca*

AMC3 ATCO.B.040 Assessors for language proficiency: Operational (ATCO) assessors have less stringent requirements than the language assessors. This does not seem level playing field and does not make sense. We therefore suggest to re-word:
~~Language proficiency assessors should not assess applicants to whom they have given language training since their preceding assessment~~
Language proficiency assessors shall not conduct assessments whenever their objectivity may be affected

response *Accepted*

comment 251

comment by: *USCA*

AMC2 ATCO.B.040(a)
USCA understands that the way EASA proposes is the best way to do it.
(a) The assessment should be subdivided into the following three elements, as follows:
(1) listening — assessment of comprehension;
(2) speaking — assessment of pronunciation, fluency, structure and vocabulary;
(3) interaction.

response *Noted*

comment	252	comment by: USCA
	<p style="text-align: center;">AMC3 ATCO.B.040(a)</p> <p>The ATCO language proficiency is about phraseology and plain language (ATCO.B.030). It is also important to underline that it has work related topics which means it is not a regular English test (ICAO doc 9835). In order to comply with these requirements USCA believes it is important to have current or former air traffic controllers in the assessment team.</p> <p><i>(a) It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers) or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert.</i></p>	
response	<p><i>Not accepted</i></p> <p>While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current or former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.</p>	
comment	265	comment by: USAC-CGT
	<p>Why do all these AMC take it for granted that the assessment will be dedicated ? It can also be conducted continuously both during the exercise of the privileges of the licence and during language training.</p> <p>We ask for the complete deletion of AMC 2, 3 and 4.</p>	
response	<p><i>Not accepted</i></p> <p>According to ICAO Annex 1, 1.2.9.6, the language proficiency of air traffic controllers should be formally evaluated at intervals in accordance with the demonstrated proficiency level. The same approach is taken in the EU legislation. Therefore the Agency concludes that continuous training, which is acknowledged as a good tool to maintain the required level of proficiency, cannot substitute the required formal assessments at regular intervals.</p> <p>Continuous training as a suitable tool for maintaining the required level of language proficiency is now explicitly mentioned in the AMC material on language training.</p>	
comment	268	comment by: Belgocontrol Training Centre
	<p>The test can be subdivided, but these elements may also coexist in the test. By replacing subdivided with comprise, different testing methods are allowed without losing the essential elements.</p>	

response	Accepted
comment	<p>279 comment by: <i>comments provided on behalf of FIT/CISL italian trade union</i></p> <p>Referring to the AMC3 ATCO.B.040(a) FIT/CISL thinks that the ATCO language proficiency is about phraseology and plain language (ATCO.B.030). It is also important to underline that it has work related topics which means it is not a regular English test (ICAO doc 9835). In order to comply with these requirements it is important to have current or former air traffic controllers in the assessment team. We propose to change it as follows:</p> <p>"It is essential that the persons responsible for language proficiency assessment are suitably trained and qualified. They should be either aviation specialists (e.g. current or former air traffic controllers), or language specialists with additional aviation-related training. The preferred approach for an assessment would be to form a team consisting of an operational expert and a language expert."</p>
response	<p>Not accepted</p> <p>While it is accepted, also by the commentator, that language specialists with additional aviation-related training are suitably qualified to conduct the language proficiency assessment, it is not understood, based on what justification aviation specialists, not being current or former air traffic controllers, should not be suitable for the subject task. Therefore, the comment is not accepted.</p>
comment	<p>284 comment by: <i>EUROCONTROL</i></p> <p>AMC2 ATCO.B.040: The AMC should also state what procedure is to be employed when one of the components is failed.</p>
response	<p>Not accepted</p> <p>The Agency believes that such details are to be defined via the method of assessment, which is to be approved by the competent authority.</p>
comment	<p>285 comment by: <i>EUROCONTROL</i></p> <p>AMC2 ATCO.B.040: The assessment of phraseology should be removed from here, as it cannot be assessed. The switch however is correct. It should also be checked that this AMC is not contradicting with GM1 to ATCO.D.080 (b) (2)</p>

response *Accepted*

comment 301 comment by: *NATS National Air Traffic Services Limited*

AMC3 ATCO.B.040 Assessors for language proficiency (d)
This requirement is more stringent than for operational assessors. It is suggested that it is re-worded. We would suggest "Language proficiency assessors should not conduct assessments whenever their objectivity may be affected."

response *Accepted*

comment 326 comment by: *ENAV*

AMC2 ATCO.B.040 Assessment (a)

The assessment should **comprise** be subdivided into the following three elements, as follows:

- (1) listening — assessment of comprehension;
- (2) speaking — assessment of pronunciation, fluency, structure and vocabulary;
- (3) interaction

Comment:

The test may be subdivided, but these elements may also coexist differently in the test. By replacing subdivided into comprise, we allow for different testing methods without losing the essential elements.

response *Accepted*

**ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART B — LICENCES, RATINGS AND ENDORSEMENTS —
AMC4 ATCO.B.040 Criteria for the acceptability of language assessment**

p. 10

comment 9 comment by: *LFV*

Ref AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (a)
Unclear what kind of organisations are meant. Clarification needed!

response *Accepted*

Language assessment bodies are the organisations conducting language assessments. The terminology throughout the relevant IR and AMC provisions is harmonised and uses consistently the term 'language assessment bodies'.

comment	10	comment by: LfV
	<p>Ref AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (b)</p> <p>It is not understood why this separation is necessary, as long as objectivity requirements are fulfilled. Suggests deletion.</p>	
response	<p><i>Not accepted</i></p> <p>The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.</p>	

comment	11	comment by: LfV
	<p>Ref AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d)</p> <p>Unnecessarily overambitious and since it is as AMC it is out of context and harmonisation. A reference to ICAO doc 9835 is better.</p>	
response	<p><i>Not accepted</i></p> <p>The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.</p>	

comment	29	comment by: LPS SR			
	<table border="1"> <tr> <td data-bbox="363 1608 644 1805"> AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d) </td><td data-bbox="660 1608 1166 2000"> The assessment documentation should include at least the following: (1) assessment objectives; (2) assessment layout, timescale, technologies used, assessment samples, voice samples; (3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation); (4) documentation demonstrating </td><td data-bbox="1182 1608 1431 1836"> This provision is a partial copy of ICAO doc 9835, so we suggest putting the reference to the document itself. </td></tr> </table>		AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d)	The assessment documentation should include at least the following: (1) assessment objectives; (2) assessment layout, timescale, technologies used, assessment samples, voice samples; (3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation); (4) documentation demonstrating	This provision is a partial copy of ICAO doc 9835, so we suggest putting the reference to the document itself.
AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d)	The assessment documentation should include at least the following: (1) assessment objectives; (2) assessment layout, timescale, technologies used, assessment samples, voice samples; (3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation); (4) documentation demonstrating	This provision is a partial copy of ICAO doc 9835, so we suggest putting the reference to the document itself.			

	<p>the assessment validity, relevance and reliability for the operational and extended levels;</p> <p>(5) documentation demonstrating the assessment validity, relevance and reliability for the expert level;</p> <p>(6) procedures to ensure that language assessments are standardised within the language assessment body and in the ATC community;</p> <p>(7) assessment procedures and responsibilities:</p> <ul style="list-style-type: none"> — preparation of individual assessment; — administration: location(s), identity check and invigilation, assessment discipline, confidentiality/security; — reporting and documentation provided to the competent authority and/or to the applicant, including sample certificate; — retention of documents and records. <p>(e) The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to the competent authority upon request.</p>	
response	<p><i>Not accepted</i></p> <p>The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.</p>	

comment

44

comment by: skyguide Corporate Regulation Management

AMC4 ATCO.B.040 (b)

~~If a language assessment body is also a training organisation, there should be a clear and documented separation between the two activities~~

There is no added value in imposing this separation and it makes this requirement more stringent than for operational training and assessment.

AMC4 ATCO.B.040 (d)

~~The assessment documentation should include at least the following:~~

~~(1) assessment objectives;~~

~~(2) assessment layout, timescale, technologies used, assessment samples, voice samples;~~

~~(3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation);~~

~~(4) documentation demonstrating the assessment validity, relevance and reliability for the operational and extended levels;~~

~~(5) documentation demonstrating the assessment validity, relevance and reliability for the expert level;~~

~~(6) procedures to ensure that language assessments are standardised within the language assessment body and in the ATC community;~~

~~(7) assessment procedures and responsibilities:~~

~~— preparation of individual assessment;~~

~~— administration: location(s), identity check and invigilation, assessment discipline, confidentiality/security;~~

~~— reporting and documentation provided to the competent authority and/or to the applicant, including sample certificate;~~

~~— retention of documents and records.~~

~~(e) The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to the competent authority upon request.~~

This is a partial copy of ICAO doc 9835, and we suggest that referencing the document itself is more beneficial to the aims of this regulation as this will allow for harmonisation. Copying part of a document bears the risk that certain elements will become out of proportion to others and will be out of context and therefore not properly applied.

AMC4 ATCO.B.040 (d) 7

The assessment documentation should include at least the following ...

(7) assessment procedures and responsibilities

Coherence: this AMC contradicts the IR as the CA has to establish the methods, so the LAB will not be able to do so as well.

AMC4 ATCO.B.040 (e)

The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to the competent authority upon request.

Record keeping is dealt with in part OR and AR. A repetition will lead to discrepancy and confusion: one source is better. Suggest to reference to the relevant provision in the IR.

response

*Not accepted***AMC4 ATCO.B.040(b)**

The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.

AMC4 ATCO.B.040(d)

The purpose of ICAO doc 9835 is to provide support to the States' effort to

comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.

comment 112

comment by: Maastricht UAC

AMC4 ATCO.B.040(b)

Criteria for the acceptability of language assessment bodies (documented separation)

What is the added value of having this separation? This requirement is more stringent than for that between operational training and assessment! It should be a task for the NSA to ensure impartiality.

Delete this paragraph.

response *Not accepted*

The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.

comment 133

comment by: NATS National Air Traffic Services Limited

AMC4 ATCO.B.040 and ATCO.B.040 Assessment of language proficiency (b). The organisations conducting assessments are the same as the language assessment bodies referred to in the related AMC If so can consistent terminology be used?

Suggest amending ATCO.B.040:

'(b) the requirements for language assessment bodies;'

response *Accepted*

comment 146 comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC4 ATCO.B.040(b) Criteria for the acceptability of language assessment bodies (documented separation)	What is the added value of having this separation? This requirement is more stringent than for that between operational training and assessment! It should be a task for the NSA to ensure impartiality.	Delete this paragraph.

response Not accepted

The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.

comment 157 comment by: CANSO Civil Air Navigation Services Organization

CANSO proposes to delete AMC4 ATCO.B.040 (b).
What is the added value of having this separation? This requirement is more stringent than for operational training and assessment.

response Not accepted

The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.

comment 158 comment by: CANSO Civil Air Navigation Services Organization

CANSO proposes to delete AMC4 ATCO.B.040 (d).
As this is a partial copy of ICAO doc 9835, we suggest simply referencing the document itself. As it is in this AMC, it is out of context and not harmonised.

response Not accepted

The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory

use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.

comment 187

comment by: HungaroControl

AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d):

The assessment documentation should include at least the following:

- ~~(1) assessment objectives;~~
 - ~~(2) assessment layout, timescale, technologies used, assessment samples, voice samples;~~
 - ~~(3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation);~~
 - ~~(4) documentation demonstrating the assessment validity, relevance and reliability for the operational and extended levels;~~
 - ~~(5) documentation demonstrating the assessment validity, relevance and reliability for the expert level;~~
 - ~~(6) procedures to ensure that language assessments are standardised within the language assessment body and in the ATC community;~~
 - ~~(7) assessment procedures and responsibilities:~~
 - ~~— preparation of individual assessment;~~
 - ~~— administration: location(s), identity check and invigilation, assessment discipline, confidentiality/security;~~
 - ~~— reporting and documentation provided to the competent authority and/or to the applicant, including sample certificate;~~
 - ~~— retention of documents and records.~~
 - ~~(e) The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to the competent authority upon request.~~
- It is recommended to use this part as GM as it is partial copy of ICAO Doc. 9835.

response Not accepted

The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.

comment	239	comment by: <i>swissatca</i>
	<p>We do not understand the value in imposing this separation. This provision makes the requirement more stringent than for operational training and assessment.</p> <p>If a language assessment body is also a training organisation, there should be a clear and documented separation between the two activities</p>	
response	<p><i>Not accepted</i></p> <p>The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.</p>	
comment	302	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (b)</p> <p>There is no added value of having this separation. This requirement is more stringent than for operational training and assessment. The proposal is to delete this provision.</p>	
response	<p><i>Not accepted</i></p> <p>The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.</p>	
comment	303	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d)</p> <p>As this is a partial copy of ICAO doc 9835, we suggest simply referencing the document itself. As it is in this AMC, it is out of context and not harmonised.</p>	
response	<p><i>Not accepted</i></p> <p>The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.</p>	

comment	<p>327</p> <p>comment by: ENAV</p> <p>AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (b)</p> <p>If a language assessment body is also a training organisation, there should be a clear and documented separation between the two activities</p> <p>Comment: What is the added value of having this separation? This requirement is more stringent than for operational training and assessment.</p> <p>The proposal is to delete this provision</p>
response	<p><i>Not accepted</i></p> <p>The reference to training organisation is to be understood as air traffic controller training organisation. The text is corrected to provide for clarity.</p>
comment	<p>328</p> <p>comment by: ENAV</p> <p>AMC4 ATCO.B.040 Criteria for the acceptability of language assessment bodies (d)</p> <p>The assessment documentation should include at least the following:</p> <p>(1) assessment objectives;</p> <p>(2) assessment layout, timescale, technologies used, assessment samples, voice samples;</p> <p>(3) assessment criteria and standards (at least for the operational, extended and expert levels of the rating scale in Appendix 2 to this Regulation);</p> <p>(4) documentation demonstrating the assessment validity, relevance and reliability for the operational and extended levels;</p> <p>(5) documentation demonstrating the assessment validity, relevance and reliability for the expert level;</p> <p>(6) procedures to ensure that language assessments are standardised within the language assessment body and in the ATC community;</p> <p>(7) assessment procedures and responsibilities:</p> <p>— preparation of individual assessment;</p> <p>— administration: location(s), identity check and invigilation, assessment discipline, confidentiality/security;</p> <p>— reporting and documentation provided to the competent authority and/or to the applicant, including sample certificate;</p> <p>— retention of documents and records.</p> <p>(e) The assessment documentation and records should be kept for a period of time determined by the competent authority and made available to the competent authority upon request.</p> <p>Comment: As this is a partial copy of ICAO doc 9835, we suggest simply referencing the document itself. As it is in this AMC, it is out of context and not harmonised.</p>
response	<p><i>Not accepted</i></p> <p>The purpose of ICAO doc 9835 is to provide support to the States' effort to comply with the provisions for language proficiency and provides guidance on how to achieve compliance with the language proficiency requirements. Thus, the nature and the formulation of the material is not purposed for mandatory use. Reproducing parts of it puts the emphasis on those high level</p>

requirements, which are considered essential to comply with at European level in order to facilitate and strengthen the establishment of uniform language testing and assessment criteria. Introducing their mandatory application and ensuring their uniform implementation via the standardisation inspections at European level cannot be ensured by simple referencing to the document. Therefore, the comment is not accepted.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART C – REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS – SECTION 1 INSTRUCTORS

p. 10-11

comment

22

comment by: ENAC-FRANCE

AMC1 ATCO.C.001(b)(2)

Comment:

ENAC supports these requirements regarding instructional techniques for theoretical instructors who are members of the academy permanent staff. However specialists from ATC units or other ATM services, teaching occasionally in a highly specialised domain, should not be requested to demonstrate all these requirements.

Justification:

Dispensing training to competent theoretical instructors from units or ATM domains, in order to enable them to give only one course would represent a considerable and unjustified workload. The quality procedure and the feedback from students and instructors will give adequate information on the instructional skills of the instructor.

Proposal:

AMC becomes Guidance Material

AMC ATCO.C.001(b)(2) becomes **GM ATCO.C.001(b)(2)**

response

Not accepted

In order to assure a certain level of harmonisation, the Agency believes the proposal should stay as AMC, and every person acting as theoretical instructor should comply with these basic requirements. Therefore, the comment is not accepted.

comment

45

comment by: skyguide Corporate Regulation Management

AMC to ATCO.C.001(b)(2)

(b)(2) has demonstrated instructional skills to the training organisation

~~AMC~~ **GM ATCO.C.001(b)(2) Instructional skills for theoretical instructors**

A successful demonstration of instructional skills for theoretical instructors should establish competence in the following areas:

- (a) lesson objectives are defined and communicated;
- (b) subject questions are fully answered;
- (c) visual aids are used appropriately;

response	<p>(d) language is unambiguous; (e) the lesson is correctly summarised; (f) lesson objectives are fulfilled. Source: UK CAA CAP 624. Should be GM level, not AMC: This is a copy-paste from the UK CAA CAP624 and out of context. There may be other relevant points that need to be tested, just as, in some cases, not all would need to be tested</p> <p><i>Partially accepted</i></p> <p>In order to assure a certain level of harmonisation, the Agency believes the proposal should stay as AMC, however, the non-exhaustive nature of the list is accepted and mirrored in the text.</p>
comment	<p>137 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>AMC1 ATCO.C.001(b)(1) Qualification of theoretical instructors As written "Appropriate professional qualification is ensured with a sufficient level of current knowledge, which is relevant to the subject and its application in air traffic control." does not make sense. Who determines "sufficient level of current knowledge", "relevant to the subject" and "its application in air traffic control"? It is not clear how this AMC meets the IR, it reads as potential IR (the what) rather than AMC (the how). Suggest amending to read 'Holders of a professional qualification should have a sufficient level of current knowledge, which is relevant to the subject and its application in air traffic control.'</p>
response	<p><i>Partially accepted</i></p> <p>The text is revised.</p>
comment	<p>151 comment by: <i>Aaron Curtis Prospect ATCOs' Branch UK</i></p> <p>AMC1 ATCO.C.001(b)(2) with ATCO.C.001(2)</p> <p>There is currently no standard method for the training organisation to assess or determine these skills. AMC needed to ensure any theoretical instructor has successfully completed a classroom instructional techniques course.</p> <p>Basic regulation requires that theoretical instructors have subject knowledge and ability to use instructional techniques.</p> <p>We propose to replace AM1 ATCO.C.001(b)(2) with:</p> <p>The theoretical instructor should have successfully completed an instructional classroom techniques course.</p>

response *Not accepted*

The AMC already includes the areas that require competence to act as a theoretical instruction. It is a decision of training organisations of how their personnel comply with this provision, which does not prevent the training organisation to deliver a instructional technique course. But in order to allow flexibility, the Agency does not consider appropriate to impose the necessity for the course.

comment 203

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.C.001(b)(1) Theoretical instructors for basic training	For theoretical instructors involved in the basic training phase of initial training any no rating is considered relevant.	If the intention is to say that any rating is suitable, then the type of rating is irrelevant.

response *Noted*

The GM is removed.

comment

216

comment by: ATCEUC- Air Traffic Controllers European Unions
Coordination

AMC2 ATCO.C.001(b)(2)

Comment:

ATCEUC proposes to include an AMC to increase the quality of classroom lessons.

It is well known that a good domain of classroom technical skills will increase successfully the final results in theoretical training.

AMC2 ATCO.C.001(b)(2) new text

The theoretical instructor should have successfully completed an instructional classroom techniques course.

response *Not accepted*

The AMC already includes the areas that require competence to act as a theoretical instruction. It is a decision of training organisations of how their personnel comply with this provision, which does not prevent the training organisation to deliver an instructional technique course. But, in order to allow flexibility, the Agency does not consider appropriate to impose the necessity for the course.

comment 253

comment by: USCA

USCA proposes to change **AMC1 ATCO.C.001(b)(2)**

~~A successful demonstration of instructional skills for theoretical instructors should establish competence in the following areas: The theoretical instructor should have successfully completed an instructional classroom techniques course that ensures at least that:~~

- ~~(a) lesson objectives are defined and communicated;~~
- ~~(b) subject questions are fully answered;~~
- ~~(c) visual aids are used appropriately;~~
- ~~(d) language is unambiguous;~~
- ~~(e) the lesson is correctly summarised;~~
- ~~(f) lesson objectives are fulfilled.~~

response Not accepted

The AMC already includes the areas that require competence to act as a theoretical instruction. It is a decision of training organisations of how their personnel comply with this provision, which does not prevent the training organisation to deliver an instructional technique course. But, in order to allow flexibility, the Agency does not consider appropriate to impose the necessity for the course.

comment

281

comment by: comments provided on behalf of FIT/CISL italian trade union

According to the Basic Regulation the requirements for the theoretical instructors are to have knowledge in the field and ability to use instructional techniques. The second requirement is supposed to be handled by the training organisation through a demonstration of competence in those areas described in the AMC1 ATCO.C.001(b)(2). But no requirement is set on who will assess those competencies. And if the objective is to have harmonised initial training, how is it going to be achieved with this kind of requirements for those who instruct? There is a need to guarantee the theoretical instructors ability to use instructional techniques and it can only be accomplished via a classroom instructional techniques course, as it was being done so far or via an equivalent course for the holders of a professional qualification appropriate to the subject being taught.

FIT/CISL proposes to change **AMC1 ATCO.C.001(b)(2)** as follows:

"The theoretical instructor should have successfully completed an instructional classroom techniques course."

response *Not accepted*

The AMC already includes the areas that require competence to act as a theoretical instruction. It is a decision of training organisations of how their personnel comply with this provision, which does not prevent the training organisation to deliver an instructional technique course. But, in order to allow flexibility, the Agency does not consider appropriate to impose the necessity for the course.

comment 299

comment by: *European Transport Workers Federation - ETF*

ETF proposes to change AMC1 ATCO.C001(b)(1) as follows:

"The theoretical instructor should have successfully completed an instructional classroom techniques course."

According to the Basic Regulation the requirements for the theoretical instructors are to have knowledge in the field and ability to use instructional techniques. The second requirement is supposed to be handled by the training organisation through a demonstration of competence in those areas described in the AMC1 ATCO.C.001(b)(2). But no requirement is set on who will assess those competencies. And if the objective is to have harmonised initial training, how is it going to be achieved with this kind of requirements for those who instruct? There is a need to guarantee the theoretical instructors ability to use instructional techniques and it can only be accomplished via a classroom instructional techniques course, as it was being done so far or via an equivalent course for the holders of a professional qualification appropriate to the subject being taught.

response *Not accepted*

The AMC already includes the areas that require competence to act as a theoretical instruction. It is a decision of training organisations of how their personnel comply with this provision, which does not prevent the training organisation to deliver an instructional technique course. But, in order to allow flexibility, the Agency does not consider appropriate to impose the necessity for the course.

comment 330

comment by: *ENAV*

SUBPART C — REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS

Comment:

Wording to be developed	A clear and explicit definition of practical versus theoretical training would be beneficial.
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response *Not accepted*

With reference to the ATCO Common Core Content Initial Training and its transposition to EU law by means of this draft Regulation and its associated AMC and GM it is clear that objectives at taxonomy level 3 or higher are of practical nature and require, with the exception of the subject Air Traffic Management Basic (ATMB), the use of practical training method. The suggested definitions do not take this into account and cannot therefore be accepted. Moreover, the Agency believes that there is sufficient guidance in the training requirements, as well as regarding the privileges of instructors and there is no further need for additional definitions.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART C — REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS — SECTION 1 INSTRUCTORS — OJTI experience exemption

p. 11

comment 286

comment by: EUROCONTROL

GM ATCO.C.010 (c):
Delete the first example as it compromises the argument for two years experience

response *Not accepted*

The described cases include the possible situations where exemptions could be made as a request of the training organisation. The Agency does not see any inconvenience in the describes cases, and, therefore, believes no change is necessary.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART C — REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS — SECTION 1 INSTRUCTORS — GM1 ATCO.C.025 Examples for temporary OJTI authorisation

p. 11

comment 114

comment by: Maastricht UAC

GM1 ATCO.C.025

Could include the case where all OJTIs

Proposed text:

Examples for temporary OJTI authorisation	have been lost due to combination of low number of students and the stated limitations. I.e. an example would be to (re)start training activities	(d) to (re)start training activities
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response *Not accepted*

The requirements to maintain the privileges of the OJTI (by means of revalidation) no longer include a minimum number of hours. Therefore, it would not possible to 'lose' OJTIs by the means stated by the commentator.

comment 147

comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
GM1 ATCO.C.025 Examples for temporary OJTI authorisation	Could include the case where all OJTIs have been lost due to combination of low number of students and the stated limitations. I.e. an example would be to (re)start training activities	Proposed text: (d) to (re)start training activities

response *Not accepted*

The requirements to maintain the privileges of the OJTI (by means of revalidation) no longer include a minimum number of hours. Therefore, it would not possible to 'lose' OJTIs by the means stated by the commentator.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART C – REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS – SECTION 1 INSTRUCTORS – Assessment of previous

p. 11-12

competence for STDIs

comment 254

comment by: USCA

AMC1 ATCO.C.095(a)(2)

This should be aligned with ATCO.C.040(b)(1) and ATCO.C.040(c)(1). Awareness of the live operational environment and current operational practices should be the same.

"Refresher training on practical instructional skills should prevent knowledge and skills erosion, and for the training of STDIs it should be designed to maintain awareness of the ~~live operational environment~~ current operational practices."

response Accepted

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART C — REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS — SECTION 2 ASSESSORS — GM1 ATCO.C.045(f) Independence from the training process

p. 12

comment 47

comment by: skyguide Corporate Regulation Management

GM1 ATCO.C.045(f)

... in a position to nominate an assessor... Editorial

response Accepted

comment 140

comment by: NATS National Air Traffic Services Limited

GM1 ATCO.C.045(f) Independence from the training process

Is the cross reference back to ATCO.C.045(f) necessary? It appears to create a circular argument with the IR being used to support the GM

Suggest amending to:

'In small ATC units service providers may not be in a position to nominate a assessor holding the unit endorsement with the desired independence from the training process.'

response Accepted

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 1 GENERAL REQUIREMENTS

p. 12

comment 85

comment by: Juan Gallego Grana - Aena

GM1 ATCO.D.005(a)(2)(ii)

Aena considers that, as in the case of flight hours accumulated by pilots when using simulators, hours accumulated using synthetic training devices which comply with the applicable specifications and requirements appropriate to the task, can be counted towards the on-the-job training.

Consequently, related guidance material should be also modified as follows:

"(b) Hours accumulated using these training tools and methods during this phase ~~can~~ be counted towards the minimum duration of on-the-job training, providing that "a certain relevant percentage-TBD" of the training is performed in a live traffic situation".

response Not accepted

The purpose of the on-the-job training is to expose applicants for units endorsements to live traffic situations. Contrary to the requirements for flight crew training, synthetic training devices in air traffic control are not certified exact replica of operational set-ups, and are only used as proposed in this GM to supplement training for pedagogical reasons.

comment 115

comment by: Maastricht UAC

GM1
ATCO.D.005(a)(2)(ii)
OJT hours

At the moment we do train and count the hours on our simulator for sector configurations that are very rarely used in the live. If the statement refers to TOTAL OJT hours then this is ok. The statement requires clarification.

Allow the hours on a simulator to be counted towards OJT

response Not accepted

The purpose of the on-the-job training is to expose applicants for units endorsements to live traffic situations. Contrary to the requirements for flight crew training, synthetic training devices in air traffic control are not certified

exact replica of operational set-ups, and are only used as proposed in this GM to supplement training for pedagogical reasons.

comment 121 comment by: *DFS Deutsche Flugsicherung GmbH*

AMC1 cannot be traced to the requirements of ATCO.D.005 (a) (2).
There is no visible relation between AMC and IR.

response *Partially accepted*

The initial sentence of provision ATCO.D.005(a)(2) describes the purposes for undertaking unit training. AMC 1 ATCO.D.005(a)(2) further elaborates the various cases established in the aforementioned provision. The AMC has been reworded to ensure consistency with other provisions of the NPA which were subject to modifications resulting from stakeholders' comments.

comment 134 comment by: *NATS National Air Traffic Services Limited*

AMC1 ATCO.D.005 (a)(2)(f)
This AMC refers to the renewal of a revoked Unit Endorsement which cannot happen. If a licence, rating or endorsement is revoked it is permanently revoked. Revoke means rescind, withdraw or cancel.
Suggest removing "revoked" as one cannot renew something has been revoked. Suggested wording for AMC1 ATCO.D.005 (a)(2)(f) is:
'the renewal of an expired or suspended unit endorsement, where applicable'.

response *Accepted*

The text is modified accordingly.

comment 148 comment by: *Maastricht UAC Training Organisation*

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
<u>GM1</u> <u>ATCO.D.005(a)(2)(ii)</u> <u>OJT hours</u>	At the moment we do train and count the hours on our simulator for sector configurations that are very rarely used in the live. If the statement refers to TOTAL OJT hours then this is ok. The	Allow the hours on a simulator to be counted towards OJT

response *Not accepted*

statement requires clarification.

The purpose of the on-the-job training is to expose applicants for units endorsements to live traffic situations. Contrary to the requirements for flight crew training, synthetic training devices in air traffic control are not certified exact replica of operational set-ups, and are only used as proposed in this GM to supplement training for pedagogical reasons.

comment 204

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
AMC1 ATCO.D.005(a)(2) Unit training	Unit training should be undertaken by applicants for a unit endorsement associated with: (a) the issue of an air traffic controller licence with at least one rating and, if applicable, one rating endorsement, and the corresponding unit endorsement; (b) the addition of a unit endorsement in an air traffic controller licence; (c) the addition of a rating and rating endorsement, if applicable, in an existing licence; (d) the addition of rating endorsement in an existing licence; (e) the reactivation of a rating and/or rating endorsement that has not been exercised for a period of four immediately preceding consecutive years, in accordance with the	c) Rating are to be obtained during initial training. It shall not be possible to obtain a rating during unit training. e) The "reactivation" (which by the way has not been defined nor used through the document) should take place before the commence of the unit training. Therefore it is not part of the unit training, but instead, a process that comes before it.

	provisions set out in ATCO.B.010(b) and ATCO.B.015(e). (f) the renewal of an expired, suspended or revoked unit endorsement, where applicable.	
response	<p><i>Partially accepted</i></p> <p>The AMC has been reworded to ensure consistency with other provisions of the NPA which were subject to modifications resulting from stakeholders comments.</p>	

comment	320	comment by: NATS National Air Traffic Services Limited
	<p>AMC1 ATCO.D.005(a)(2) Unit training This AMC appears to be concerned with who (applicants) whereas the related IR is concerned with the phases of unit training leading to the issue of an air traffic controller licence The IR and AMC do not align. We suggest rewording to be developed together with moving to the correct place in the regulation.</p>	
response	<p><i>Partially accepted</i></p> <p>The initial sentence of provision ATCO.D.005(a)(2) describes the purposes for undertaking unit training. AMC 1 ATCO.D.005(a)(2) further elaborates the various cases established in the aforementioned provision. The AMC has been reworded to ensure consistency with other provisions of the NPA which were subject to modifications resulting from stakeholders' comments.</p>	

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 2 INITIAL TRAINING REQUIREMENTS

p. 12-13

comment	20	comment by: ENAC-FRANCE
	<p>AMC1 ATCO.D.025(c)(1) <u>Comment:</u></p>	

ENAC fully supports this AMC as it is necessary to have a generic environment to train students who will continue in an operational unit.
GM1 ATCO.D.025 Rating Training performance objectives
Comment:
This document is guidance material that should be reviewed.
Justification:
Performance objectives can be defined in different ways.
Proposal:
Delete
~~GM1 ATCO.D.025 Rating Training performance objectives~~

response

Partially accepted

As regards the comment referring to AMC1 ATCO.D.025(c)(1):
Noted.
As regards the comment fererring to GM1 ATCO.D.025:
Not accepted. The Agency considers the referred EUROCONTROL document adequate for the purpose and invites to note that Guidance Material is not of any binding nature, but an explanatory means.

comment

143comment by: NATS National Air Traffic Services Limited

GM1 ATCO.D.030(d) Certificate of completion of initial training
As this is GM to ATCO.D.030(d) the reference to the IR is not required.
Suggest amending to:
'The certificate of completion may take any form and title and may cover multiple candidates.'

response

Accepted

The text is modified accordingly.

comment

205comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.D.010 Composition of initial training	(b) Rating training may not be commenced before the completion of the basic training.	Rating training should only commence after the completion of basic training

response

Not accepted

According to the provisions in ATCO.D.030, basic training and rating training can be delivered also as integrated course. In case of integrated course, the training organisation shall establish a clear distinction between examinations and assessments for basic training and each rating training included in the concerned integrated course.

comment 321 comment by: NATS National Air Traffic Services Limited

AMC1 ATCO.D.025(c)(1) Rating training performance objectives
The text of this reads as GM rather than an AMC to the related IR.
The IR and AMC do not align. We suggest rewording to be developed together with moving to the correct place in the regulation

response Partially accepted

The text of this AMC is slightly modified and assigned to the entire provision ATCO.D.025, as its requirements are applicable to all rating training courses and the related performance objectives.
The Agency would welcome a more detailed indication from the commentator on what the mentioned correct place would be.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 3 UNIT TRAINING REQUIREMENTS

p. 13

comment 1 comment by: European HF Advisory group

Page 13
AMC1 ATCO.D.045(c)(4) (c)
[Can the training on stress and fatigue management be incorporated in TRM?](#)

response Noted

The Agency is considering the proposal for the issue of the Decision.

comment 82 comment by: CAA-NL

[AMC 1 ATCO.D.045 - Composition of unit training](#)
COMMENTS: [AMC 1 ATCO.D.045 \(2\)\(c\)\(d\)](#) : see justification
JUSTIFICATION: AMC1 ATCO.D.045(2)(c) Abnormal and emergency situations training
These definitions are not in compliance with the definitions used by for example

response

LVNL and probably other ANSP's. The definitions are situation-based and not based on the operations. Nominal and non-nominal operations can be handled without compromising safety, efficiency and environment. For exceptional operations efficiency and environment may be compromised. For exceptional operations a Quick Reference Handbook has to be used, this is described as a checklist in AMC1 ATCO.D.045(2)(c)3.

During training on synthetic training devices it is not feasible to train all identified exceptional operations or emergency and abnormal situations. There is no such thing as a complete list of abnormal and emergency situations.

In the current situation the trainee undergoes synthetic device training in which all the competences are trained and numerous exceptional operations are trained.

Noted

The essential requirement in paragraph 4(c)(i) of Annex Vb to 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.

The AMC requires to identify a list of abnormal and emergency situation which are likely to be encountered at the unit, which have to be trained on STD, and not to identify and provide training on all the possible cases of such situations.

comment

83

comment by: CAA-NL

AMC1 ATCO.D.045(2)(d) Human factors training

During unit training there's no explicit training in human factors topics during OJT. Implicit training will take place during PreOJT and OJT. During Initial Training and PreOJT presentations and training take place on all mentioned human factors. The only bottleneck is that in AMC1 ATCO.D.045(2)(d) it is mentioned that the training should take place during OJT.

ALTERNATIVE PROPOSAL:

Different definitions for emergency and abnormal situations.

Training of a relevant number of exceptional operations which supports the students training in his ATC competences instead of all identified emergency and abnormal situations. Human factors training not during OJT, but during

response	<p>Initial Training and Unit Training (pre OJT).</p> <p><i>Noted</i></p> <p>The comment refers to an AMC which does not exist in the file B.IV of this NPA. As regards the proposal to modify the definitions for abnormal and emergency situations: The essential requirement in paragraph 4(c)(i) of Annex Vb to 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. As regards the training on human factors during unit training: The mandatory subjects to be taught during unit training are established in paragraph 4(c)(i) of Annex Vb to the Basic Regulation. It is recalled that the pre-on-the-job phase is an optional phase of the unit training, according to ATCO.D.005(a)(2)(iii).</p>
comment	<p>159 <i>comment by: NATS National Air Traffic Services Limited</i></p>
response	<p>AMC1 ATCO.D.045(c)(4) Human factors training There is a clear overlap between the stress and fatigue management requirements and those developed by EASA RMG ATM.001 as they also apply to air traffic controllers and need to be consistent and not overlap. Suggest ensuring that these requirements align with the proposed rules on ANS/ATM requirements.</p> <p><i>Partially accepted</i></p> <p>Requirements included in NPA 2013-08 define the responsibilities of the ATC service providers as regards the management of stress and fatigue, and are to be seen in the context of the provision of ATC service. Requirements in AMC1 ATCO.D.045(c)(4) relate to training on stress and fatigue management during unit training, which are placed under the responsibility of the training organisation in the context of unit training. The AMC text is modified accordingly.</p>

comment

272

comment by: IFATCA

19 NPA2012-18
(BIV)**AMC1 ATCO.D.045(c)(3) Abnormal
and emergency situations training**Adapt AMC1
accordingly

response

Noted

The Agency understands that this comment is incomplete and the issue is further specified in the next entry.

comment

273

comment by: IFATCA

19 NPA2012-18
(BIV)**AMC1 ATCO.D.045(c)(3)
Abnormal and emergency
situations training****Abnormal
Unusual and
emergency
situations
training**Adapt AMC1
accordingly

response

Not accepted

The essential requirement in paragraph 4(c)(i) of Annex Vb to 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."

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 3 UNIT TRAINING REQUIREMENTS

p. 14-15

comment

21

comment by: ENAC-FRANCE

AMC1 ATCO.D.055(b)(14)

(a) Abnormal and emergency situations

Comment:

For Air Traffic Control the terms used are "Unusual, Degraded and Emergency" situations (UDES).

Justification:

It is preferable to substitute the two words "Unusual and Degraded" in place of "Abnormal".

This describes two separate types of situations.

Proposal:

(a) ~~Abnormal~~ Unusual, degraded and emergency situations

For identified ~~abnormal~~ unusual, degraded and emergency situations...

Desirable behaviours of the applicants in case of ~~abnormal~~ unusual, degraded and emergency situations...

(b)...for all identified ~~abnormal~~ unusual, degraded and emergency situations.

GM1 ATCO.D.055(b)(5)

For further information see Eurocontrol's material such as....

Comment:

This document is guidance material that should be reviewed.

Justification:

Training plans can be defined in different ways.

Proposal:

Delete

~~For further information see EUROCONTROL's material such as 'Guidance for Developing ATCO Basic Training Plans', Edition 2.0, EUROCONTROL Brussels, 2010.~~

response

Not accepted

The essential requirement in paragraph 4(c)(i) of Annex Vb to 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.

The list of training methods is an extract from the document 'Guidance for developing ATCO basic training plans', edition 2.0 EUROCONTROL Brussels, 2010 and it is considered valid also for the purposes of unit training.

comment 116

comment by: Maastricht UAC

GM1 ATCO.D.055(b)(5) Training methods	Wrong reference (Basic rather than Unit). Omission of OJT.	Add On-the-Job-Training (OJT) as No. 1 in the list of training methods and add reference to "Guidelines for the Development of Unit Training Plans", Edition 1.0, 2.0, EUROCONTROL Brussels, 2005
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response Accepted

On-the-job is added to the list of training methods proposed. This list is an extract from the document 'Guidance for developing ATCO basic training plans', edition 2.0 EUROCONTROL Brussels, 2010 and it is considered valid also for the purposes of unit training.

The EUROCONTROL documents 'Guidelines for the development of unit training plans', edition 2.0, EUROCONTROL Brussels, 2005' and 'Annex to the Guidelines for the Development of Unit Training Plans: Examples of UTP, Edition 2.0 from 10.06.2010' are referred to in the newly introduced GM2 ATCO.D.055.

comment 149

comment by: Maastricht UAC Training Organisation

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
GM1 ATCO.D.055(b)(5) Training methods	Wrong reference (Basic rather than Unit). Omission of OJT.	Add On-the-Job-Training (OJT) as No. 1 in the list of training methods and add reference to "Guidelines for the Development of Unit Training Plans", Edition 1.0, 2.0, EUROCONTROL Brussels, 2005

response *Accepted*

On-the-job is added to the list of training methods proposed. This list is an extract from the document 'Guidance for developing ATCO basic training plans', edition 2.0 EUROCONTROL Brussels, 2010 and it is considered valid also for the purposes of unit training.

The EUROCONTROL documents 'Guidelines for the development of unit training plans', edition 2.0, EUROCONTROL Brussels, 2005' and 'Annex to the Guidelines for the Development of Unit Training Plans: Examples of UTP, Edition 2.0 from 10.06.2010' are referred to in the newly introduced GM2 ATCO.D.055.

comment 160

comment by: *NATS National Air Traffic Services Limited*

AMC1 ATCO.D.055 Unit training plan

The text would be more appropriate as GM rather than AMC as similar text in the rule has been GM (e.g. GM1 ATCO.D.040 Initial training plan. The provisions of ATCO.OR.C.015 (which are further detailed under AMC1 ATCO.OR.C.015(c)) are also relevant.)

Suggest changing:

AMC1 ATCO.D.055 Unit training plan

To:

GM1 ATCO.D.055 Unit Training Plan

response *Accepted*

Consistency with ATCO.D.040 is ensured.

comment 161

comment by: *NATS National Air Traffic Services Limited*

response	<p>GM1 ATCO.D.055(b)(5) Training methods for unit training This GM is out of sequence insofar as it should come before AMC1 ATCO.D.055(b)(6) Suggest arranging AMC and GM in correct sequential order.</p> <p><i>Accepted</i></p> <p>The correct sequence is established.</p>
comment	<p>287 comment by: EUROCONTROL</p> <p>GM1 ATCO.D.055 (b) (5)</p> <p>On-the-Job-Training (OJT) should be added in the list of training methods, as well as a reference to "Guidelines for the Development of Unit Training Plans", Edition 1.0, 2.0, EUROCONTROL Brussels, 2005.</p>
response	<p><i>Accepted</i></p> <p>On-the-job is added to the list of training methods proposed. This list is an extract from the document 'Guidance for developing ATCO basic training plans', edition 2.0 EUROCONTROL Brussels, 2010 and it is considered valid also for the purposes of unit training. The EUROCONTROL documents 'Guidelines for the development of unit training plans', edition 2.0, EUROCONTROL Brussels, 2005' and 'Annex to the Guidelines for the Development of Unit Training Plans: Examples of UTP, Edition 2.0 from 10.06.2010' are referred to in the newly introduced GM2 ATCO.D.055.</p>

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D – AIR TRAFFIC CONTROLLER TRAINING – SECTION 3 UNIT TRAINING REQUIREMENTS

p. 15-16

comment	<p>53 comment by: Belgocontrol</p> <p>ANSPs should have the possibility that assessments are supervised / monitored by a dedicated responsible training officer and/or a dedicated responsible of the operational management. This is for the moment not included in the regulation.</p>
response	<p><i>Noted</i></p> <p>The link between the training organisation and the ATC provider is addressed in ATCO.OR.B.015(b). The Agency would welcome a more detailed indication from the commentator on the content and the scope of the provisions to be developed as regards the subject of the comment.</p>

comment 206

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.D.070 Assessments during unit endorsement courses	<p>GM1 ATCO.D.070 Assessments of practical skills during unit endorsement courses</p> <p>(a) Dedicated practical assessments</p> <p>(1) A dedicated practical assessment should normally be carried out for the issue, revalidation or renewal of a unit endorsement. A dedicated practical assessment may consist of a single assessment or a series of assessments, as detailed in the unit training plan or in the unit competence scheme, depending on the purpose of the assessment.</p> <p>To conduct a dedicated practical assessment the competence assessor(s) should sit with the applicant with the purpose of observing the quality and assessing the standard of work being carried out and, if also acting as OJTI at the same time, to maintain a safe, orderly and expeditious flow of air traffic.</p> <p>The applicant concerned should be briefed on the conduct of the assessment. For those situations where an applicant's performance cannot be observed at the time of the assessment (e.g. low visibility operations, snow clearing, military activity, etc.), the assessment may be supplemented by synthetic training device sessions and oral examination.</p> <p>(2) Dedicated practical assessments may also be conducted at any stage of</p>	<p>The definition of assessment already implies the "practical skills".</p> <p>Although this would not be the right place for it since the scope of the GM is the assessment within the "unit endorsement course", assessments for revalidation should be treated somewhere in the text (definitely not in (GM1) ATCO.D.070 unless the reference to the unit endorsement course is changed).</p>

response *Partially accepted*

training as detailed in the unit training plan, where a more definitive measure of the progress is required, for example after 50 hours of practical training.

The editorial changes are accepted. The proposed amendment intending this GM to cover the revalidation of the unit endorsement and the competence assessment leading thereto is not accepted, since this subject is covered via the unit competence scheme.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 4 CONTINUATION TRAINING REQUIREMENTS

p. 16-17

comment 19

comment by: ENAC-FRANCE

AMC1 ATCO.D.080(b)(2): Abnormal and emergency situation

Comment:

For Air Traffic Control the terms used are "Unusual, Degraded and Emergency" situations (UDES).

Justification:

It is preferable to substitute the two words "Unusual and Degraded" in place of "Abnormal".

This describes two separate types of situations.

Alternative Proposal:

~~Abnormal~~ Unusual, degraded situation and emergency training situation training should be designed to expose air traffic controllers to circumstances and situations which they do not habitually or commonly experience.

The essential difference from an emergency situation is that the element of danger or serious risk is not necessarily present in an ~~abnormal~~ unusual or degraded situation.

response *Not accepted*

The essential requirement in paragraph 4(c)(i) of Annex Vb to 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

49

comment by: skyguide Corporate Regulation Management

AMC1 ATCO.D.080

Where applicable, refresher topics should be examined or assessed, using the process described in the unit competence scheme.

Or

~~Where applicable, refresher topics should be examined or assessed, using the process described in the unit competence scheme.~~

Refresher training shall be focussed on training, competencies shall be assessed in the competence assessment.

Or

As it is in the IR, we suggest deleting.

response

Accepted

The subject AMC is deleted.

comment

50

comment by: skyguide Corporate Regulation Management

AMC2 ATCO.D.080 (b) (2)

~~a) The training organisation should develop objectives for phraseology~~

~~b) phraseology should be examined or assessed~~

Phraseology is only one potential subject of refresher training, many other subjects are possible. The refresher training concept shall be based on operational experience and incident investigation results.

Another fundamental problem with this AMC is that the use of phraseology may not be appropriate in emergency and abnormal situations, which is precisely where the use plain language becomes important. Emphasising the phraseology aspect does not make sense. However, phraseology needs to be trained and tested throughout the ATCOs career and this should fall under ATCO.D.080 (a) (1) standard practices and procedures.

response

Partially accepted

ATCO.D.080 is amended to require the use of approved phraseology and effective communication both in standard practices and procedures and in abnormal and emergency situations training. The assessment of phraseology, together with the other refresher training subjects is covered under the competence assessment to be defined in the unit competence scheme. The associated AMC is amended accordingly.

comment 62

comment by: CAA-NL

AMC 1 to ATCO.D.080:

The requirements of ATCO.D.080 do not seem to point to the necessity of assessments and examinations.

Furthermore, the existing practice regarding refresher training has proved to work very well without such assessments and examinations.

For this reason, it is proposed to delete the AMC.

response Accepted

The subject AMC is deleted.

comment 74

comment by: DSNA

AMC1 ATCO.D.080.Comment :

See general comment #331 point 3.

Multiplying the number of tests can be counter-productive.

Practical skills are already assessed through a specific procedure described in **AMC1 ATCO.B.025(a)(6)**. There is no need to have other assessments of practical skills within refresher training.

Proposal :

The text should leave enough room to ANSPs to organise the competence assessments either by assessments of practical skills **OR** by assessments during refresher training, but not both.

response Accepted

The subject AMC is deleted.

comment 117

comment by: Maastricht UAC

**AMC1
ATCO.D.080
and
ATCO.B.025 (a)**

It is unclear whether there is a requirement to assess refresher training or not and, if so, under which circumstances. The

In order to derive the maximum benefit from the limited time allocated, refresher

Refresher training	assessment part is currently covered by the ongoing competence assessment of ATCOs.	training topics should <u>not</u> be assessed but solely taught and practiced. Proposal: delete AMC1 ATCO.D.080
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response *Accepted*

The subject AMC is deleted.

comment 135

comment by: *NATS National Air Traffic Services Limited*

AMC1 ATCO.D.080, ATCO.B.025 (a)(8), ATCO.B.025 (a)(9) and ATCO.D.080 ATCO.B.025 (a)(8) and (9) in combination with ATCO.D.080 and AMC1 ATCO.D.080 refer to refresher training. It is noted that there is an inconsistency between the IR and AMC1 ATCO.D.080 where the IR does specify a requirement for performance objectives to be developed but does not specify a requirement for examinations or assessment. Whereas the AMC does require examinations or assessment.

The higher regulation IR does not require examinations or assessment for refresher training whereas the lower regulation AMC does. This is inconsistent. Suggest making the regulations consistent by either adding examinations or assessment to the IR or removing the requirement from the AMC. Suggested wording for either ATCO.D.080 (c);

'Training organisations shall develop a syllabus for the refresher training course. Where a subject refreshes skills of air traffic controllers, the training organisation shall also develop performance objectives which shall be examined or assessed'.

or remove AMC1 ATCO.D.080.

response *Accepted*

The subject AMC is deleted.

comment 150

comment by: *Maastricht UAC Training Organisation*

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC1 ATCO.D.080 and	It is unclear whether there is a requirement to assess refresher	In order to derive the maximum benefit from

	<table><tr><td>ATCO.B.025 (a) Refresher training</td><td>training or not and, if so, under which circumstances. The assessment part is currently covered by the ongoing competence assessment of ATCOs.</td><td>the limited time allocated, refresher training topics should <u>not</u> be assessed but solely taught and practiced. Proposal: delete AMC1 ATCO.D.080</td></tr></table>	ATCO.B.025 (a) Refresher training	training or not and, if so, under which circumstances. The assessment part is currently covered by the ongoing competence assessment of ATCOs.	the limited time allocated, refresher training topics should <u>not</u> be assessed but solely taught and practiced. Proposal: delete AMC1 ATCO.D.080
ATCO.B.025 (a) Refresher training	training or not and, if so, under which circumstances. The assessment part is currently covered by the ongoing competence assessment of ATCOs.	the limited time allocated, refresher training topics should <u>not</u> be assessed but solely taught and practiced. Proposal: delete AMC1 ATCO.D.080		
response	<p><i>Accepted</i></p> <p>The subject AMC is deleted.</p>			
comment	<p>194</p> <p>comment by: <i>FABEC</i></p> <p>FABEC proposes to delete ATCO.D.080. Refresher topics should be examined or assessed, using the process described in the unit competence scheme. <i>Refresher training shall be focussed on training, competencies shall be assessed in the competence assessment as defined in the competency scheme.</i></p>			
response	<p><i>Accepted</i></p> <p>The subject AMC is deleted.</p>			
comment	<p>195</p> <p>comment by: <i>FABEC</i></p> <p>FABEC proposes to delete AMC1 ATCO.D.080(b)(2). a) The training organisation should develop objectives for phraseology b) phraseology should be examined or assessed <i>Phraseology is only one potential subject of refresher training, many other subjects are possible. The refresher training concept shall be based on operational experience and incident investigation results.</i></p>			
response	<p><i>Partially accepted</i></p> <p>ATCO.D.080 is amended to require the use of approved phraseology and effective communication both in standard practices and procedures and in abnormal and emergency situations training. The assessment of phraseology, together with the other refresher training subjects, is covered under the competence assessment to be defined in the unit competence scheme. The</p>			

associated AMC is amended accordingly.

comment

207

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.D.080(b)(2) Phraseology and radio communication training	Communication misunderstanding is present in most air traffic occurrences and the consistent use of standard ICAO phraseology is designed to mitigate such occurrences. Phraseology and radio communication training is part of the linguistic training according to ICAO; the ICAO language proficiency check does not assess the use of standard phraseology.	What is the relevance of the highlighted text to have it as GM?

response

Accepted

The subject GM is redrafted and the highlighted part of the text is deleted.

comment

218

comment by: swissatca

AMC1 ATCO.D.080 Refresher training shall be pure training.
Assessing competencies shall be part of the competence assessment scheme.
We suggest deleting this article.

response

Accepted

The subject AMC is deleted.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D — AIR TRAFFIC CONTROLLER TRAINING — SECTION 4 CONTINUATION TRAINING REQUIREMENTS — Language training

p. 17-18

comment	153	comment by: Aaron Curtis Prospect ATCOs' Branch UK
	<p>AMC1 ATCO.D.090</p> <p>To provide appropriate AMC to the removal of the ambiguity of 'where appropriate' in the IR whilst recognising some ANSPs would not want to provide unnecessary language training. We propose to replace the AMC with:</p> <p>Language training should be provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised.</p>	
response	<p><i>Partially accepted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.</p>	

comment	208	comment by: AESA / DSANA						
	<table border="1"> <thead> <tr> <th>Reference:</th><th>Quote/Proposal</th><th>Comment/Remark (Reason for comment)</th></tr> </thead> <tbody> <tr> <td>AMC1 ATCO.D.090 Language training</td><td>Language training should be made available to at least: (a) holders of language proficiency endorsement at level 4; (b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.</td><td>The way the text is now suggests that only those who hold a level 4 should receive language training, while the possibility for people who hold a higher level should also exist (it is the employer's decision).</td></tr> </tbody> </table>		Reference:	Quote/Proposal	Comment/Remark (Reason for comment)	AMC1 ATCO.D.090 Language training	Language training should be made available to at least: (a) holders of language proficiency endorsement at level 4; (b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.	The way the text is now suggests that only those who hold a level 4 should receive language training, while the possibility for people who hold a higher level should also exist (it is the employer's decision).
Reference:	Quote/Proposal	Comment/Remark (Reason for comment)						
AMC1 ATCO.D.090 Language training	Language training should be made available to at least: (a) holders of language proficiency endorsement at level 4; (b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.	The way the text is now suggests that only those who hold a level 4 should receive language training, while the possibility for people who hold a higher level should also exist (it is the employer's decision).						
response	<p><i>Noted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are,</p>							

however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff. However, nothing prevents ANSPs to provide language training to the entire staff, if they so wish.

comment

217

comment by: *ATCEUC- Air Traffic Controllers European Unions Coordination*

AMC1 ATCO.D.090

Comment:

Language erosion is well recognized even for higher levels of language proficiency. It is essential to provide ATCOs with the language training except in those cases where language proficiency endorsement is practiced in a daily basis.

ATCEUC proposes to change AMC1 ATCO.D.090 Language training

AMC1 ATCO.D.090 new text

Language training should be made available to:

(a) holders of language proficiency endorsement at level 4;

(b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills

provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised.

response

Not accepted

Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.

comment

225

comment by: *Federazione ATM-PP*

Federazione ATM-PP proposal is to change AMC1 ATCO.D.090 as follows:

Language training should be made available to:

(a) holders of language proficiency endorsement at level 4;

(b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills

	<p><i>provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised.</i></p> <p>To avoid language erosion it is essential to provide ATCOs with the language training except in those cases where language proficiency endorsement is practiced in a daily basis.</p>
response	<p><i>Not accepted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.</p>
comment	<p>229 comment by: <i>European Transport Workers Federation - ETF</i></p> <p>AMC1 ATCO.D.090 Language training OPTION A Language training should be made available to: (a) holders of language proficiency endorsement at level 4; (b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills. holders of language proficiency endorsement at level 5 or 6 <u>except where the language assessed is a native language of the country in which the licence holder exercises the privileges of their license, and is the common language in use at the unit in which a certificate of competency is held.</u></p> <p>OPTION B <u>"Language training should be provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised."</u></p> <p>ETF proposes two different options with the difference of "to make available" "to provide" the language training.</p>
response	<p><i>Not accepted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are however maintained, as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.</p>
comment	<p>233 comment by: <i>SINCTA - Portuguese Air Traffic Controllers' Union</i></p> <p>AMC1 ATCO.D.090</p>

	<p>Language erosion is well recognized even for higher levels of language proficiency. SINCTA thinks it is essential to provide ATCOs with the language training except in those cases where the language is practiced in a daily basis. SINCTA propose to change AMC1 ATCO.D.090.</p> <p>Proposed text:</p> <p>Language training should be made available to:</p> <p>(a) holders of language proficiency endorsement at level 4;</p> <p>(b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.</p> <p><u>provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised.</u></p>
response	<p><i>Not accepted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term "where appropriate" are now resolved by inserting the criteria into the implementing rule. The criteria are however maintained, as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.</p>
comment	<p>255</p> <p>comment by: USCA</p> <p>Language erosion is well recognized even for higher levels of language proficiency. It is essential to provide ATCOs with the language training except in those cases where the language is practiced in a daily basis. USCA proposes to change ATCO.D.090 and AMC1 ATCO.D.090 Language training.</p> <p>AMC1 ATCO.D.090</p> <p><i>"Language training should be made available to:</i></p> <p><i>(a) holders of language proficiency endorsement at level 4; (b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.</i></p> <p><i><u>provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised."</u></i></p>
response	<p><i>Not accepted</i></p> <p>Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.</p>
comment	<p>267</p> <p>comment by: USAC-CGT</p>

response

USAC-CGT fully supports ETF comment on language training and we encourage EASA to replace AMC1 by : "Language training should be provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised."

Not accepted

Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.

comment

280

comment by: *comments provided on behalf of FIT/CISL italian trade union*

Referring to the **AMC1 ATCO.D.090** FIT/CISL, considering the comment to the **ATCO.D.090** that it is essential to provide ATCOs with the language training except in those cases where the language is practiced in a daily basis, proposes to change as follows:

"Language training should be provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised."

response

Not accepted

Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclarities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.

comment

324

comment by: *ENAV*

AMC1 ATCO.D.090 Language training

~~Language training should be made available to:~~

~~(a) holders of language proficiency endorsement at level 4;~~

~~(b) licence holders without the opportunity to apply their skills on a regular basis in order to maintain their language skills.~~

Language training should be provided to holders of a language proficiency endorsement, except where the language assessed is a local language in which the licence holder exercises the privileges of their licence and is the local language at the unit in which the privileges of the licence are exercised.

Comment:

response

The proposed amendment to the AMC allows for language training when needed to maintain the required level without imposing language training on local languages which are exercised daily (e.g. national language) without burdening the providers unnecessarily.

Not accepted

Taking into account the comments received the provisions on language training are moved to the provisions dealing with the language proficiency requirements. Unclearities around the term 'where appropriate' are now resolved by inserting the criteria into the implementing rule. The criteria are, however, maintained as it is not considered appropriate to oblige ANSPs to provide language training for the entire staff.

ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D – AIR TRAFFIC CONTROLLER TRAINING – SECTION 5 TRAINING OF INSTRUCTORS AND ASSESSORS – Training of practical instructors

p. 18-19

comment

12

comment by: LfV

Ref AMC2 ATCO.D.095 (a)

It is clear that not all of the listed items necessarily are applicable to all circumstances of instruction/training. It is strongly recommended to change the "should establish" to "may establish" and make it part of the Guidance Material instead.

response

Partially accepted

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment

25

comment by: ENAC-FRANCE

GM1 ATCO.D.095 Training of practical instructors

Comment:

This document is guidance material that should be reviewed.

Justification:

OJTI course syllabus can be defined in different ways.

Proposal:

Delete

GM1 ATCO.D.095 Training of practical instructors

response

Not accepted

The reference is maintained as Guidance Material only. Organisations are free to choose other sources of inspiration when establishing the subject training.

comment 51 comment by: skyguide Corporate Regulation Management

AMC2 GM ATCO.D.095(a)(1)

(a) A successful assessment of instructional techniques for practical instructors ~~may should~~ establish competence in the following areas:

(b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs ~~may should~~ establish competence in the following areas: These requirements belong in GM. Not all of them may be applicable to all instructing circumstances. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to a course manager or some other person, depending on the personnel setup in the organisation).

response Partially accepted

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment 75 comment by: DSN

AMC1 to ATCO.D.095(1)(a).

Clarification needed on second paragraph.

response Noted

The Agency understands that the question relates to the second paragraph of AMC1 to ATCO.D.095(a)(1) and concerns the synthetic training devices used for OJTI training.

The subject AMC does not create an obligation to use STDs for the training of OJT instructors. It only provides requirements on the STD itself when such device is used, which may be the case, depending on local situations.

comment 84 comment by: CAA-NL

AMC2 ATCO.D.095(a)(1) a +b- [Training of practical instructors](#)

COMMENTS: Too much detail mentioned in the AMC. Leave it up to the national ANSP's and their NSA instead of declaring the UK articles as being leading!

JUSTIFICATION: The training of practical instructors is provided by skilled coaching professionals who have had suitable professional training in the field of training, coaching, instruction and assessment. These persons have knowledge of instructional technics, didactics, training methods, communication

	skills etc. Providing training in, and assessing coaching and instructional skills must be done by a skilled coaching professional who has had suitable professional training in the field of training, coaching, instruction and assessment. That person has to have knowledge of instructional techniques, didactics, training methods, communication skills etc. Knowledge an ATCO does not have, not even if he is an OJTI himself. An air traffic controller is not an expert in the field of coaching and instruction by definition. ALTERNATIVE PROPOSAL: delete AMC's or move to GM
response	<p><i>Not accepted</i></p> <p>With the approach of competency based training the definition of high level training objectives is considered necessary in order to establish the necessary level of harmonisation across Member States, which is purposed to create the basis for the mutual recognition of the endrovements.</p>

comment	87	comment by: Juan Gallego Grana - Aena
	<p>AMC1 ATCO.D.095(a)(1) Aena does not agree with the obligation of using synthetic training device for the practical OJTI training. Therefore, it is proposed to modify the guidance material as highlighted in red: "For the practical OJTI training, a PTT or higher level of synthetic training device should may be used".</p>	
response	<p><i>Accepted</i></p> <p>The subject AMC does not create an obligation to use STDs for the training of OJT instructors. It only provides requirements on the STD itself when such device is used, which may be the case, depending on local situations.</p>	

comment	118	comment by: Maastricht UAC			
	<table border="1"> <tr> <td> <p>AMC2 ATCO.D.095(a)(1) Training of practical instructors</p> </td><td> <p>Proposal to move these requirements to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else)</p> </td><td> <p>Proposed text: (a) A successful assessment of instructional techniques for practical instructors may shoud establish competence in the following areas: (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs</p> </td></tr> </table>		<p>AMC2 ATCO.D.095(a)(1) Training of practical instructors</p>	<p>Proposal to move these requirements to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else)</p>	<p>Proposed text: (a) A successful assessment of instructional techniques for practical instructors may shoud establish competence in the following areas: (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs</p>
<p>AMC2 ATCO.D.095(a)(1) Training of practical instructors</p>	<p>Proposal to move these requirements to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else)</p>	<p>Proposed text: (a) A successful assessment of instructional techniques for practical instructors may shoud establish competence in the following areas: (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs</p>			

response *Partially accepted*

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment 152

comment by: *Maastricht UAC Training Organisation*

<u>Paragraph identification:</u>	<u>Justification:</u>	<u>Alternative proposal:</u>
AMC2 ATCO.D.095(a)(1) Training of practical instructors	Proposal to move these requirements to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else)	Proposed text: (a) A successful assessment of instructional techniques for practical instructors may should establish competence in the following areas: (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs may should establish competence in the following areas:

response *Partially accepted*

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment 181

comment by: *CANSO Civil Air Navigation Services Organization*

CANSO proposes to move AMC2 ATCO.D.095 (a) (1) to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else).

Considering the proposal to move to GM, CANSO proposes the following change:

(a) *A successful assessment of instructional techniques for practical instructors ~~may~~ should establish competence in the following areas:*

(b) *In addition to paragraph (a), a successful assessment of instructional techniques for STDIs ~~may~~ should establish competence in the following areas:*

response *Partially accepted*

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment 234

comment by: *SINCTA - Portuguese Air Traffic Controllers' Union*

AMC1 ATCO.D.095(a)(1)

SINCTA didn't find any definition for "higher level of synthetic training device". The definition of simulator looks enough to change the text.

Proposed text:

For the practical OJTI training, a PTT or ~~higher level of synthetic training device~~ a simulator should be used. If the synthetic training environment does not correspond to the rating of the intended instructional environment, the applicant should practise the instructional skills in those procedures in which it is intended to provide instruction for at least one day before being assessed.

response *Accepted*

comment 235

comment by: *SINCTA - Portuguese Air Traffic Controllers' Union*

AMC1 ATCO.D.095(a)(2)

This should be aligned with ATCO.C.040(b)(1) and ATCO.C.040(c)(1). Awareness of the live operational environment and current operational practices should be the same. **SINCTA** wishes to harmonise this concept.

response	<p>Proposed text: <i>Refresher training on practical instructional skills should prevent knowledge and skills erosion, and for the training of STDIs it should be designed to maintain awareness of the live operational environment current operational practices.</i></p> <p>Accepted</p>
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comment	<p>256 comment by: USCA</p> <p style="text-align: center;">AMC1 ATCO.D.095(a)(1)</p> <p>USCA believes that "higher level of synthetic training device" is confusing. "Simulator" is enough. <i>"For the practical OJTI training, a PTT or higher level of synthetic training device a simulator should be used. If the synthetic training environment does not correspond to the rating of the intended instructional environment, the applicant should practise the instructional skills in those procedures in which it is intended to provide instruction for at least one day before being assessed."</i></p> <p>response Accepted</p>
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comment	<p>257 comment by: USCA</p> <p style="text-align: center;">AMC1 ATCO.D.095(a)(2)</p> <p>Awareness of the live operational environment and current operational practices should be the same. <i>"Refresher training on practical instructional skills should prevent knowledge and skills erosion, and for the training of STDIs it should be designed to maintain awareness of the live operational environment current operational practices"</i></p> <p>response Accepted</p>
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comment	<p>288 comment by: EUROCONTROL</p> <p>AMC1 ATCO.D.095 (a) (1)</p> <p>Should the proposed change to ATCO.C.010/ATCO.C.015 be accepted (to be given practical training and be assessed at the unit before applying for the OJT endorsement), this AMC should be removed. If this AMC is maintained, it should specifically cover Basic Regulation Annex Vb 4 (g) (ii) iii</p> <p>response Noted</p> <p>The intention is to meet this requirement prior to the exercise of the privileges, not to the application. It would not be possible to practise skills in the</p>
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procedures when applying for an OJTI endorsement, since it could be used in any unit (provided that the corresponding requirements are met). Therefore, the Agency considers the requirement is well placed in ATCO.C.010(b)(3) and the corresponding AMC is maintained with the intention to cover the referenced essential requirement.

comment

289

comment by: EUROCONTROL

AMC2 ATCO.D.095 (a) (1)

Without the probationary period for a future OJT (see ATCO.C.010 and ATCO.C.015), this element cannot be assessed. It cannot be assessed in a classroom course with any degree of value. It would be better removed than left in and not be practicable.

response

Not accepted

The intention is to meet this requirement prior to the exercise of the privileges, not to the application. It would not be possible to practise skills in the procedures when applying for an OJTI endorsement, since it could be used in any unit (provided that the corresponding requirements are met). Therefore, the Agency considers the requirement is well placed in ATCO.C.010(b)(3) and the corresponding AMC is maintained.

comment

294

comment by: HungaroControl

**~~AMC2~~ GM ATCO.D.095(a)(1) Training of practical instructors
ASSESSMENT OF INSTRUCTIONAL TECHNIQUES FOR PRACTICAL
INSTRUCTORS:**

These requirements should be in GM.

response

Partially accepted

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment

304

comment by: NATS National Air Traffic Services Limited

AMC2 ATCO.D.095(a)(1) Training of practical instructors
ASSESSMENT OF INSTRUCTIONAL TECHNIQUES FOR PRACTICAL
INSTRUCTORS

It is proposed that these requirements are moved to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else).

Move to GM

response

(a) A successful assessment of instructional techniques for practical instructors may establish competence in the following areas:
 (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs may establish competence in the following areas:

Partially accepted

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

comment

329

comment by: ENAV

**AMC2 GM ATCO.D.095(a)(1) Training of practical instructors
 ASSESSMENT OF INSTRUCTIONAL TECHNIQUES FOR PRACTICAL INSTRUCTORS**

(a) A successful assessment of instructional techniques for practical instructors ~~may should~~ establish competence in the following areas:
 (b) In addition to paragraph (a), a successful assessment of instructional techniques for STDIs ~~may should~~ establish competence in the following areas:
 Comment: We propose to move these requirements to GM. Not all of them may be applicable to all circumstances of instructing. (e.g. (a)(5) plan training is not always a part of the OJTI tasks and may belong to the course manager or someone else)

response

Partially accepted

The proposed change to GM with the use of the verb 'may' is not accepted as it would prevent the necessary and required level of harmonisation across Member States. The training objectives have been, however, reviewed and revised and the general reference to 'plan training' is now deleted.

**ANNEX I, PART-ATCO, REQUIREMENTS FOR THE LICENSING OF AIR TRAFFIC CONTROLLERS, SUBPART D – AIR TRAFFIC CONTROLLER TRAINING –
 SECTION 5 TRAINING OF INSTRUCTORS AND ASSESSORS – Training of assessors**

p. 19

comment

86

comment by: Juan Gallego Grana - Aena

GM1 ATCO.D.100(a)(3)

Aena considers that assessment of assessor competence using synthetic training devices which comply with the applicable specifications and requirements appropriate to the task, can be considered as realistic, so it is proposed to modify the guidance material as highlighted in red:

"Any assessment of assessor competence should be realistic and it could take place during live traffic situations or during training. ~~Artificial set-ups should be~~

response	<p>avoided, if possible".</p> <p>Accepted</p>
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comment	<p>197</p> <p>comment by: UK CAA</p> <p>Page No: 19 Paragraph No: AMC1 ATCO.D.100(a)(1) Training of assessors Comment: Part of a specific skill for an assessor is the ability to create questions to test understanding and to develop a good questioning technique, this is not captured in the list. Justification: To provide a complete and comprehensive list. Proposed Text: Add to the list of training objectives: "(i) create appropriate questions to test understanding and develop a good questioning technique."</p> <p>response</p> <p>Accepted</p>
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comment

209

comment by: AESA / DSANA

Reference:	Quote/Proposal	Comment/Remark (Reason for comment)
GM1 ATCO.D.100(a)(3) Training of assessors	ASSESSMENT OF ASSESSOR COMPETENCE The level of harmonisation on competence assessment is low as a result of the variety of methods. Any assessment of assessor competence should be realistic and it could should take place during real <u>assessments</u> live traffic situations or during training. Artificial set-ups should be avoided, if possible.	The assessments are always supposed to be carried out within a training scenario, no matter if it is on a real live traffic situation (OJT) or not (other training). Therefore, taking this into account, the paragraph should be reconsidered. In the case that this is necessary (e.g. low traffic periods) this assessment could be supplemented by appropriate simulation with average to high traffic density scenarios. It is important to remark that this should always be a supplementary requirement not to be used as a replacement for the real traffic assessment.
	Application form for issue, renewal, etc...	1. Renewal or revalidation of rating and rating endorsements is not possible since they, by definition, do not expire.

		<p>2. The language proficiency endorsement does not refer to any language in the application form (it shall have at least English + local language if existing)</p> <p>3. "Licence endorsements" shall be defined anywhere, since it is a "concept" that has not been explained. Sometimes the term is used and some not (see next AMC AMC1 ATCO.AR.D.010)</p>
response	<p><i>Partially accepted</i></p> <p>The suggested deletion as regard the GM on assessment of assessor competence is partially accepted. The Agency considers that the emphasis should be put on the 'realistic' nature of the assessment, but no obligation is appropriate with regard to the actual situations during which the assessment is taking place.</p> <p>Regarding the comments on the application form please refer to the responses under the corresponding segment.</p>	

ANNEX II, PART-ATCO.AR, REQUIREMENTS FOR COMPETENT AUTHORITIES, SUBPART D – ISSUE, REVALIDATION, RENEWAL, SUSPENSION AND REVOCATION OF LICENCES, RATINGS AND ENDORSEMENTS

p. 21-23

comment	3	comment by: <i>LFV</i>
	<p>GM1 ATCO.AR.D.001 (a) Suggests to add the option for local language issue.</p>	
response	<i>Accepted</i>	

comment	54	comment by: <i>skyguide Corporate Regulation Management</i>
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response

GM1 ATCO.AR.D.001 (a) Application form
Add the option for local language issue, therefore add the language that one is applying for.

Accepted

comment

120

comment by: Maastricht UAC

**GM
ATCO.AR.D.001(a)**
Application form

Providing only an example of a paper form is a retrograde step when competent authorities, training organisations and ANSPs are trying to digitise all records for efficiency, accuracy and traceability reasons.

Proposed text: AMC1
ATCO.AR.D.001(a) -
Applications for the issuing of licences, ratings and endorsements together with the evidence supporting the applications should, wherever possible, be done by secure electronic means.

response

Partially accepted

The Agency takes note of the comment. The proposal is amended as guidance material to the subject provision.

'GM2 ATCO.AR.D.001(a) Application form for the issue, revalidation and renewal of licences, ratings and endorsements

Application for the issue, revalidation and renewal of licences, ratings and endorsements together with all relevant certificates and/or documents supporting the application might be done by secure electronic means.'

comment

139

comment by: Maastricht UAC Training Organisation

**Paragraph
identification:**

Justification:

Alternative proposal:

**GM
ATCO.AR.D.001(a)**
Application form

Providing only an example of a paper form is a retrograde step when competent

Proposed text: AMC1
ATCO.AR.D.001(a) -
Applications for the issuing of licences, ratings and

		authorities, training organisations and ANSPs are trying to digitise all records for efficiency, accuracy and traceability reasons.	endorsements together with the evidence supporting the applications should, wherever possible, be done by secure electronic means.
response	<p><i>Partially accepted</i></p> <p>The Agency takes note of the comment. The proposal is amended as guidance material to the subject provision.</p> <p>'GM2 ATCO.AR.D.001(a) Application form for the issue, revalidation and renewal of licences, ratings and endorsements</p> <p>Application for the issue, revalidation and renewal of licences, ratings and endorsements together with all relevant certificates and/or documents supporting the application might be done by secure electronic means.'</p>		
comment	155	comment by: <i>CANSO Civil Air Navigation Services Organization</i>	
	With regards to GM1 ATCO.AR.D.001(a), CANSO proposes to add the option for local language issue, therefore add the language that one is applying for.		
response	<i>Accepted</i>		
comment	274	comment by: <i>HungaroControl</i>	
	<p>GM1 ATCO.AR.D.001(a) Application form for the issue, revalidation and renewal of licences, ratings and endorsements:</p> <p>Application form</p> <p>Add the option for local language issue, therefore add the language that one is applying for.</p>		
response	<i>Accepted</i>		
comment	300	comment by: <i>NATS National Air Traffic Services Limited</i>	
	GM1 ATCO.AR.D.001(a) Application form for the issue, revalidation and renewal of licences, ratings and endorsements		

response	Add the option for local language requirements that one is applying for.
	<i>Accepted</i>

comment	325	comment by: ENAV
	Add the option for local language issue, therefore add the language that one is applying for	
response	<i>Accepted</i>	

comment	345	comment by: Federal Office of Civil Aviation FOCA
	Article: GM1 ATCO.AR.D.001 a) Comment / Issue / Suggestion: the form is not usable in its current content and format. Justification: Switzerland would be happy to provide the Agency with a usable form.	
response	<i>Noted</i> The Agency takes note of the proposal.	

ANNEX II, PART-ATCO.AR, REQUIREMENTS FOR COMPETENT AUTHORITIES, SUBPART D – ISSUE, REVALIDATION, RENEWAL, SUSPENSION AND REVOCATION OF LICENCES, RATINGS AND ENDORSEMENTS – Suspension and revocation of licences, ratings and endorsements

p. 24

comment	63	comment by: CAA-NL
	AMC1 to ATCO.AR.D.010 Incident investigation should initially be based on non-punitive principles. A licence should only be suspended as a last resort when the license holder is proven to be a causal factor and the service provider does not take adequate action. For this reason, we suggest to delete this AMC.	
response	<i>Accepted</i>	

comment	290	comment by: EUROCONTROL
	GM1 ATCO.AR.D.010 (d): The notification of revocation should be part of the IR and not GM.	
response	Accepted	

ANNEX II, PART-ATCO.AR, REQUIREMENTS FOR COMPETENT AUTHORITIES, SUBPART E — CERTIFICATION PROCEDURE FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS — Changes to training organisations	p. 24-25
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comment	55	comment by: skyguide Corporate Regulation Management
	<p>AMC1 ATCO.AR.E.005</p> <p>(a) The competent authority should be informed of any changes to personnel specified in Annex III (Part-ATCO.OR) that may affect the certificate.</p> <p>(b) The competent authority should receive from the organisation each management system documentation amendment, including amendments that do not require prior approval by the competent authority.</p> <p>(1) Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should approve in writing.</p> <p>(2) Where the amendment does not require prior approval, the competent authority should acknowledge receipt of the notification in writing within 10 working days.</p> <p>(c) For changes requiring prior approval, the competent authority may conduct an audit of the organisation in order to verify the training organisation's compliance with the applicable requirements.</p> <p>(d) In case of any non-compliance, the competent authority should:</p> <p>(1) notify the training organisation about the non-compliance and request further changes; and</p> <p>(2) in case of level 1 or level 2 findings, act in accordance with ATCO.AR.E.020.</p> <p>The IR requires a process and this should be defined in cooperation with the training organisation taking into account the various local requirements. This AMC does not bring any added value to the IR in paragraphs (a), (b)(1), (c) and (d) and is too inflexible in paragraph (b)(2).</p>	
response	<p><i>Partially accepted</i></p> <p>The Agency takes note of the comment. The text is revised and the last two paragraphs, namely (c) and (d) removed. However it should be noted that the aim of the acceptable means of compliance is to assist the regulated organisation in the implementation and understanding of the rules. AMCs are not binding and serve as a means by which the requirements contained in the IRs can be met, hereby offering the benefit of presumption of compliance. However, regulated organisations may decide to show compliance with the requirements using other means and may use an alternative means of compliance, based, or not, on those issued by the Agency. This flexibility is provided through the process provided in ATCO.AR.A.015 Means of compliance.</p>	

comment	64	comment by: CAA-NL
	<p>AMC1 to ATCO.AR.E.005 (a) and (b)(first part): This seems to be an organisational requirement. For this reason, it is proposed to transfer the requirements to the ORs.</p>	
response	<p><i>Accepted</i></p> <p>The comment is accepted and the resulting text in Part-ATCO.OR is: AMC1 ATCO.OR.A.020 Changes to the training organisation (a) The training organisation should inform the competent authority of any changes to personnel specified in Annex III (Part-ATCO.OR) that may affect the certificate or the training approval attached to it. (b) The training organisation should send to the competent authority each management system documentation amendment. Where the amendment requires the competent authority's approval, the training organisation should receive it in writing.</p>	
comment	65	comment by: CAA-NL
	<p>AMC1 to ATCO.AR.E.005.(d): Following from ATCO.AR.E.005: - a change requiring prior approval that is 'non-compliant' will never be introduced, and - a change not requiring prior approval that is 'non-compliant' will be dealt with in the continuous oversight process, for which the 'standard' requirements already apply. For this reason, there seems to be no need for this AMC and it is therefore proposed to delete it.</p>	
response	<p><i>Accepted</i></p>	
comment	90	comment by: DSAC - French NSA
	<p><u>Paragraph</u> AMC1 ATCO.AR.E.005 (b) <u>Alternative proposal</u> (b) The competent authority should receive from the organisation each management system documentation amendment, including amendments that do not requires prior approval by the competent authority. (1) Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should approve in writing. (2) Where the amendment does not require prior approval, the competent authority should acknowledge receipt of the notification in writing within 10 working days. <u>Justification</u> The monitoring of changes to the organisation should not bring further administrative burden. To avoid further administrative burden and keep it at minimum level, the</p>	

	<p>process of changes on both side, competent Authority and training organisation, should be kept as light as possible and should not include rigid processes. It should aim at a more flexible working methods between competent Authority and training organisations.</p>
response	<p><i>Not accepted</i></p> <p>Regarding the changes not requiring prior approval, the controlled process proposed is twofold. First, the competent authority needs to approve a procedure developed by the training organisation defining the scope of such changes, their management, and notification mechanism as part of its certification process. Then the information provided by the training organisation when notifying such change does not have to be assessed immediately, but within the continuous oversight process. This process strikes a balance between a reasonable amount of oversight by the competent authority on the one hand, and a reasonable amount of 'freedom to act' by the training organisations on the other hand.</p> <p>Furthermore, it should be pointed out that AMCs are not binding and serve as a means by which the requirements contained in the IRs can be met, hereby offering the benefit of presumption of compliance. However, regulated organisations may decide to show compliance with the requirements using other means and may use an alternative means of compliance, based, or not, on those issued by the Agency. This flexibility is provided through the process provided in ATCO.AR.A.015 Means of compliance.</p>
comment	<p>162 <i>comment by: NATS National Air Traffic Services Limited</i></p> <p>AMC1 ATCO.AR.E.005 Changes to training organisations The title of this AMC does not align with its related IR. Suggest amending: 'ATCO.AR.E.005 Changes to organisations' To: 'ATCO.AR.E.005 Changes to training organisations'</p>
response	<p><i>Accepted</i></p>
comment	<p>163 <i>comment by: NATS National Air Traffic Services Limited</i></p> <p>GM1 ATCO.AR.E.005 Changes to training organisations The title of this GM does not align with its related IR. Suggest amending: 'ATCO.AR.E.005 Changes to organisations' To: 'ATCO.AR.E.005 Changes to training organisations'</p>
response	<p><i>Accepted</i></p>

comment	165	comment by: NATS National Air Traffic Services Limited
	<p>GM2 ATCO.AR.E.005(b) Changes to training organisations The title of this GM does not align with its related IR. Suggest amending: 'ATCO.AR.E.005 Changes to organisations' To: 'ATCO.AR.E.005 Changes to training organisations'</p>	
response	Accepted	

comment	210	comment by: AESA / DSANA						
<table border="1"> <thead> <tr> <th>Reference:</th><th>Quote/Proposal</th><th>Comment/Remark (Reason for comment)</th></tr> </thead> <tbody> <tr> <td>AMC1 ATCO.AR.E.005 Changes to training organisations</td><td> <p>(a) The competent authority should be informed of any changes to personnel specified in Annex III (Part-ATCO.OR) that may affect the certificate.</p> <p>(b) The competent authority should receive from the organisation each management system documentation amendment, including amendments that do not require prior approval by the competent authority.</p> <p>(1) Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should approve in writing.</p> <p><i>AMC & GM to Part-ATCO, Part-ATCO.AR and Part-ATCO.OR NPA 2012-18 (B.IV)</i> 15 Nov 2012 Page 25 of 45</p> <p>(2) Where the amendment does not require prior approval, the competent authority should acknowledge receipt of the notification in writing within 10 working days from reception.</p> </td><td> <p>Changes that require prior approval should be listed as GM</p> <p>It is important to state that the time for the acknowledgement notification should take into account the date of reception.</p> </td></tr> </tbody> </table>			Reference:	Quote/Proposal	Comment/Remark (Reason for comment)	AMC1 ATCO.AR.E.005 Changes to training organisations	<p>(a) The competent authority should be informed of any changes to personnel specified in Annex III (Part-ATCO.OR) that may affect the certificate.</p> <p>(b) The competent authority should receive from the organisation each management system documentation amendment, including amendments that do not require prior approval by the competent authority.</p> <p>(1) Where the amendment requires the competent authority's approval, the competent authority, when satisfied, should approve in writing.</p> <p><i>AMC & GM to Part-ATCO, Part-ATCO.AR and Part-ATCO.OR NPA 2012-18 (B.IV)</i> 15 Nov 2012 Page 25 of 45</p> <p>(2) Where the amendment does not require prior approval, the competent authority should acknowledge receipt of the notification in writing within 10 working days from reception.</p>	<p>Changes that require prior approval should be listed as GM</p> <p>It is important to state that the time for the acknowledgement notification should take into account the date of reception.</p>
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response *Partially accepted*

A new GM with examples of changes that may affect the certificate or the terms of approval of the training organisation or the training organisation's management system is proposed in Part-ATCO.OR as GM1 ATCO.OR.A.020 Changes to the training organisation.
The proposal in paragraph (2) is accepted.

comment 344

comment by: *Federal Office of Civil Aviation FOCA*

Article:

AMC 1 ATCO.AR.E.005

Comment / Issue / Suggestion:
whole paragraph. Suggest delete

Justification:

It is written in the IR that the competent authority shall establish a process for this purpose. By creating this AMC the possibilities of the competent authority are limited

response *Partially accepted*

The Agency takes note of the comment. The text is revised and the last two paragraphs, namely (c) and (d) removed. However, it should be noted that the aim of the acceptable means of compliance is to assist the regulated organisation in the implementation and understanding of the rules. AMCs are not binding and serve as a means by which the requirements contained in the IRs can be met, hereby offering the benefit of presumption of compliance. However, regulated organisations may decide to show compliance with the requirements using other means and may use an alternative means of compliance, based, or not, on those issued by the Agency. This flexibility is provided through the process provided in ATCO.AR.A.015 Means of compliance.

**ANNEX II, PART-ATCO.AR, REQUIREMENTS FOR COMPETENT AUTHORITIES,
SUBPART F — SPECIFIC REQUIREMENTS RELATING TO AERO-MEDICAL
CERTIFICATION — SECTION I — GENERAL — AMC1 ATCO.AR.F.010 Medical
certificate**

p. 26-27

comment 35

comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

AMC1 ATCO.AR.F.010 Medical certificate

response	<p>Comment the wording "ATCO class 3 medical certificate" is not consistent with the IR Proposal ATCO CLASS 3 MEDICAL CERTIFICATE</p> <p><i>Accepted</i></p>
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comment	<p>56 <i>comment by: skyguide Corporate Regulation Management</i></p> <p>AMC1 ATCO.AR.F.010 - Medical certificate - MEDICAL CERTIFICATE - ATCO MEDICAL CERTIFICATE (English and any language(s) determined by the competent authority) 3 times. It is not necessary to repeat this 3 times. ATCO CLASS 3 MEDICAL CERTIFICATE. In this way it is consistent with the IR. 'European Union' to be deleted for non-EU Member States. Comment: There should be provision for the EASA member states that are not EU member states. Furthermore, the certificate is an EU certificate, whether one is an EU member or not. Therefore, when one complies with the requirements of the regulation, one should receive the certificate. The size of each page should be one eighth A4. Comment: It would be far more convenient to use a standard credit card size (52mm x 85mm) 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.</p> <p>response <i>Partially accepted</i></p> <p>1. Not accepted. The sentence 'English and any national language(s) ...' helps to confirm that in all 3 cases the English version should not be deleted and that the national language(s) should be added. If this would be said only once, the question may come up whether English only, or national language only, may be enough in the remaining lines. 2. Accepted 3. Not accepted. This has been discussed for the licences and medical certificates for pilots and the political decision was to remove 'European Union' if the licence or medical certificate is issued in a country that is not a member of the EU. This has no effect on the licence or certificate themselves, they will be accepted the same way in the EU Member States as in EASA associated States. 4. Not accepted. The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.</p>
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comment	<p>61 <i>comment by: skyguide Corporate Regulation Management</i></p> <p>SUBPART F page 26 to 37 APPLICATION FORM FOR A MEDICAL CERTIFICATE (26) ... Current ATCO activity: Tower o Radar o Other ATCO o We suggest to use the ratings i.e.: ADV / ADI / ACP / ACS / APP / APS, as these</p>
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	<p>terms are incorrect and do not refer to any licence inscriptions. (132) Refusal of pilot/ATCO licence medical certificate As the AME does not issue, renew or revalidate the licence, but the medical certificate, this needs to be reworded. (151) General and medical history: Do you have, or have you ever had, any of the following? 151 Are you pregnant? Comment: It does not make sense to ask the question "do you have or have you had are you pregnant". As a woman may be pregnant, but not yet know it, it would be better to ask "are you aware that you are pregnant"</p>
response	<p><i>Not accepted</i></p> <p>It is a very normal and routine question for a doctor to ask 'are you pregnant'. This is e.g. the question before taking an x-ray, before giving local anaesthesia and so on.</p>
comment	<p>100 comment by: HungaroControl</p> <p>ATCO.AR.F.010 Medical certificate: The explanation and format should be in the same place, suggest the appendix as for the ATCO licence format.</p>
response	<p><i>Not accepted</i></p> <p>Experience with the pilot medical certificate in the rule was that Member States wanted some extra information on the medical certificate, or arrange the items slightly differently, or amend other details. If this is the case an Article 14(6) exemption is needed which will not be granted because a rule change on a national basis is only accepted in urgent cases. In order to avoid problems on the format of medical certificates, it has been decided to provide the minimum content in the rule and the format itself in an AMC. If a Member State wants to add information, this can be done. The Agency has to be informed according to ARA.GEN.120.</p>
comment	<p>102 comment by: HungaroControl</p> <p>AMC1 ATCO.AR.F.010 Medical certificate MEDICAL CERTIFICATE ATCO MEDICAL CERTIFICATE: (English and any language(s) determined by the competent authority) The sentence is written 3 times. Why?</p>
response	<p><i>Not accepted</i></p> <p>The sentence 'English and any national language(s) ...' helps to confirm that in all 3 cases the English version should not be deleted and that the national language(s) should be added. If this would be said only once, the question may</p>

come up whether English only, or national language only, may be enough in the remaining lines.

comment

103

comment by: HungaroControl

AMC1 ATCO.AR.F.010 Medical certificate:~~ATCO~~ **CLASS 3** MEDICAL CERTIFICATE

It should be consistent with IR.

response

Accepted

comment

104

comment by: HungaroControl

AMC1 ATCO.AR.F.010 Medical certificate:

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

What about the EASA member states that are not EU member states? The certificate is an EU certificate whether one is an EU member or not, when one complies with the requirements of the regulation.

response

Not accepted

This has been discussed for the licences and medical certificates for pilots and the political decision was to remove 'European Union' if the licence or medical certificate is issued in a country that is not a member of the EU. This has no effect on the licence or certificate themselves, they will be accepted the same way in the EU Member States as in EASA associated States.

comment

105

comment by: HungaroControl

AMC1 ATCO.AR.F.010 Medical certificate:

The size of each page should be one eighth A4.

For convenience we propose to use a credit card size licence.

response

Not accepted

The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.

comment

176

comment by: CANSO Civil Air Navigation Services Organization

With regards to AMC1 ATCO.AR.F.010, the explanation and format should be in the same place; CANSO suggests the appendix as for the ATCO licence format.

response

Not accepted

Experience with the pilot medical certificate in the rule was that Member States wanted some extra information on the medical certificate, or arrange the items slightly differently, or amend other details. If this is the case an Article 14(6) exemption is needed which will not be granted because a rule change on a national basis is only accepted in urgent cases.

In order to avoid problems on the format of medical certificates it has been decided to provide the minimum content in the rule and the format itself in an AMC. If a Member State wants to add information, this can be done. The Agency has to be informed according to ARA.GEN.120.

comment 177 comment by: *CANSO Civil Air Navigation Services Organization*

With regards to the provision ' (English and any language(s) determined by the competent authority) 3 times' in AMC1 ATCO.AR.F.010, CANSO wonders why this is 3 times.

response *Not accepted*

The sentence 'English and any national language(s) ...' helps to confirm that in all 3 cases the English version should not be deleted and that the national language(s) should be added. If this would be said only once, the question may come up whether English only, or national language only, may be enough in the remaining lines.

comment 178 comment by: *CANSO Civil Air Navigation Services Organization*

CANSO proposes the following change to AMC1 ATCO.AR.F.010: ~~ATCO~~ **CLASS 3**
MEDICAL CERTIFICATE
This is to be consistent with the IR.

response *Accepted*

comment 179 comment by: *CANSO Civil Air Navigation Services Organization*

With regards to the text ' European Union' to be deleted for non-EU Member States in AMC1 ATCO.AR.F.010, what about the EASA member states that are not EU member states? The certificate is an EU certificate whether one is an EU member or not, when one complies with the requirements of the regulation.

response *Not accepted*

This has been discussed for the licences and medical certificates for pilots and the political decision was to remove 'European Union' if the licence or medical certificate is issued in a country that is not a member of the EU. This has no effect on the licence or certificate themselves, they will be accepted the same way in the EU Member States as in EASA associated States.

comment	180	comment by: <i>CANSO Civil Air Navigation Services Organization</i>
	<p>With regards to the requirement 'the size of each page should be one eighth A4' in AMC ATCO.AR.F.010, CANSO considers that this is bigger than the standard credit card size. For convenience, using standard credit card size would allow the licence holder to have the certificate in their wallet.</p>	
response	<p><i>Not accepted</i></p> <p>The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.</p>	
comment	220	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.</p>	
response	<p><i>Not accepted</i></p> <p>The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.</p>	
comment	317	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>AMC1 ATCO.AR.F.010 Medical certificate To be consistent with the IR change ATCO to CLASS 3 "CLASS 3 MEDICAL CERTIFICATE"</p>	
response	<p><i>Accepted</i></p>	
comment	318	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>AMC1 ATCO.AR.F.010 Medical certificate This does not take into account EASA member states that are not EU member states. The certificate is an EU certificate whether one is an EU member or not, when one complies with the requirements of the regulation. Suggest that 'European Union' be deleted for non-EU Member States.</p>	
response	<p><i>Not accepted</i></p> <p>This has been discussed for the licences and medical certificates for pilots and the political decision was to remove 'European Union' if the licence or medical certificate is issued in a country that is not a member of the EU. This has no effect on the licence or certificate themselves, they will be accepted the same way in the EU Member States as in EASA associated States.</p>	

comment	319	comment by: NATS National Air Traffic Services Limited
	<p>AMC1 ATCO.AR.F.010 Medical certificate This is bigger than the standard credit card size. For convenience, using standard credit card size would allow the licence holder to have the certificate in their wallet. We would recommend that you do not specify size.</p>	
response	<p><i>Not accepted</i></p> <p>The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.</p>	

comment	339	comment by: ENAV
	<p>AMC1 ATCO.AR.F.010 Medical certificate MEDICAL CERTIFICATE ATCO MEDICAL CERTIFICATE (English and any language(s) determined by the competent authority) 3 times Comment: Why is this 3 times?</p>	
response	<p><i>Not accepted</i></p> <p>The sentence 'English and any national language(s) ...' helps to confirm that in all 3 cases the English version should not be deleted and that the national language(s) should be added. If this would be said only once, the question may come up whether English only, or national language only, may be enough in the remaining lines.</p>	

comment	340	comment by: ENAV
	<p>AMC1 ATCO.AR.F.010 Medical certificate ATCO CLASS 3 MEDICAL CERTIFICATE Comment: To be consistent with the IR</p>	
response	<p><i>Accepted</i></p>	

comment	341	comment by: ENAV
	<p>AMC1 ATCO.AR.F.010 Medical certificate 'European Union' to be deleted for non-EU Member States. Comment: What about the EASA member states that are not EU member states? The certificate is an EU certificate whether one is an EU member or not, when one complies with the requirements of the regulation</p>	

response *Not accepted*

This has been discussed for the licences and medical certificates for pilots and the political decision was to remove 'European Union' if the licence or medical certificate is issued in a country that is not a member of the EU. This has no effect on the licence or certificate themselves, they will be accepted the same way in the EU Member States as in EASA associated States.

comment 342

comment by: ENAV

AMC1 ATCO.AR.F.010 Medical certificate

The size of each page should 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 certificate in their wallet.

response *Not accepted*

The size of the medical certificate will be the same ATCOs and for pilots so that AMEs have to purchase the software to complete them only once.

ANNEX II, PART-ATCO.AR, REQUIREMENTS FOR COMPETENT AUTHORITIES, SUBPART F – SPECIFIC REQUIREMENTS RELATING TO AERO-MEDICAL CERTIFICATION – SECTION I – GENERAL – AMC1 ATCO.AR.F.025 Aero-medical forms

p. 28-37

comment 30

comment by: LPS SR

**APPLICATION FORM FOR
A MEDICAL
CERTIFICATE(20)**

(26) ...

Current ATCO
activity: Tower o
Radar o Other
ATCO o

The terms are incorrect. We suggest to use the ratings i.e.: ADV / ADI / ACP / ACS / APP / APS

response *Partially accepted*

The titles of the boxes will be amended as follows:
ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for

the AME in normal cases.

In cases where limitations apply, more specific information on the work environment will be required on a case by case basis.

comment 31

comment by: LPS SR

**APPLICATION FORM
FOR A MEDICAL
CERTIFICATE(151)**

General and
medical history: Do
you have, or have
you ever had, any
of the following?
151 Are you
pregnant?

The question asked is "do you
have or have you had?" A
woman may be pregnant, but
not yet know it. It would be
better to ask "are you aware
that you are pregnant?"
However, pregnancy is not an
illness, but a "natural" state.

response Not accepted

The question 'are you pregnant' is the standard question of a doctor during an examination or assessment, e.g. before taking an x-ray or before applying a local anaesthetic, or simply when taking the medical history of a female patient depending on age.

If the applicant for a medical certificate is not aware of a pregnancy she will say 'no'. Once an ATCO knows that she is pregnant, she will inform the AME under her obligation of ATCO.MED.A.020 Decrease in medical fitness.

comment 97

comment by: HungaroControl

APPLICATION FORM FOR A MEDICAL CERTIFICATE(20):

(26) ...

Current ATCO activity: Tower o Radar o Other ATCO o

The terms are incorrect. We suggest to use the ratings i.e.: ADV / ADI / ACP / ACS / APP / APS

response Partially accepted

The titles of the boxes will be amended as follows:
ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for the AME in normal cases.
In cases where limitations apply, more specific information on the work environment will be required on a case by case basis.

comment

98

comment by: HungaroControl

APPLICATION FORM FOR A MEDICAL CERTIFICATE(132):

Refusal of pilot/ATCO licence medical certificate
The AME cannot refuse an ATCO licence.

response

Not accepted

This is necessary information of the AME. A licence may be denied for a medical reason (alcohol, drugs, degraded cognitive function etc) which has to be taken into account in the examination and assessment. The refusal of a medical certificate is under number (20).

comment

99

comment by: HungaroControl

APPLICATION FORM FOR A MEDICAL CERTIFICATE(151):

General and medical history: Do you have, or have you ever had, any of the following?

151 Are you pregnant?

151 does not align with the question asked "do you have or have you had". Furthermore, a woman may be pregnant, but not yet know it, therefore it would be better to ask "are you aware that you are pregnant". Additionally, pregnancy is not an illness, but a "natural" state.

response

Not accepted

The question 'are you pregnant' is the standard question of a doctor during an examination or assessment, e.g. before taking an x-ray or before applying a local anaesthetic, or simply when taking the medical history of a female patient depending on age.

If the applicant for a medical certificate is not aware of a pregnancy she will say 'no'. Once an ATCO knows that she is pregnant, she will inform the AME under her obligation of ATCO.MED.A.020 Decrease in medical fitness.

comment

167

comment by: NATS National Air Traffic Services Limited

AMC1 ATCO.AR.F.025 Aero-medical forms

As this is AMC to ATCO.AR.F.025 the reference to the IR is not required.

Amend to:

response

'The forms should reflect the information indicated in the following forms and corresponding instructions for completion.'

Not accepted

It is clearer to state to exactly which rule the forms belong. This does not change the status of the forms as AMC.

comment

211

comment by: *CANSO Civil Air Navigation Services Organization*

CANSO has the following comments with regards to AMC1 ATCO.AR.F.025, application form for a medical certificate:

APPLICATION FORM FOR A MEDICAL CERTIFICATE(20)	(26) ...	The terms are incorrect. We suggest to use the ratings i.e.: ADV / ADI / ACP / ACS / APP / APS
	Current ATCO activity: Tower o Radar o Other ATCO o	
APPLICATION FORM FOR A MEDICAL CERTIFICATE(132)	Refusal of pilot/ATCO licence medical certificate	The AME is not responsible for issuing, renewing or revalidating the licence, but for issuing, renewing and revalidating the medical certificate.
APPLICATION FORM FOR A MEDICAL CERTIFICATE(151)	General and medical history: Do you have, or have you ever had, any of the following? 151 Are you pregnant?	151 does not align with the question asked "do you have or have you had". Furthermore, a woman may be pregnant, but not yet know it, therefore it would be better to ask "are you aware that you are pregnant" Additionally, pregnancy is not an illness, but a "natural" state.

response

Partially accepted

(26) Accepted but not in the details as proposed in the comment. The titles of the boxes will be amended as follows:

ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for the AME in normal cases.

In cases where limitations apply, more specific information on the work environment will be required on a case by case basis.

(132) Not accepted. This is necessary information of the AME. A licence may be denied for a medical reason (alcohol, drugs, degraded cognitive function etc) which has to be taken into account. The refusal of a medical certificate is under number (20).

(151) Not accepted. The question 'are you pregnant' is the standard question of a doctor during an examination or assessment, e.g. before taking an x-ray or before applying a local anaesthetic, or simply when taking the medical history of a female patient depending on age.
If the applicant for a medical certificate is not aware of a pregnancy she will say 'no'. Once an ATCO knows that she is pregnant, she will inform the AME under her obligation of ATCO.MED.A.020 Decrease in medical fitness.

comment

221

comment by: *swissatca*

We suggest to use the ratings e.g.: ADV / ADI / ACP / ACS / APP / APS instead of TWR/RADAR/Other ATCO

response

Partially accepted

The titles of the boxes will be amended as follows:
ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for the AME in normal cases.
In cases where limitations apply, more specific information on the work environment will be required on a case by case basis.

comment

222

comment by: *swissatca*

Number 132: We suggest to reword this article, as the AME does not issue, renew or revalidate the licence, but only the medical certificate.

response

Not accepted

This is necessary information of the AME. A licence may be denied for a medical reason (alcohol, drugs, degraded cognitive function etc) which has to be taken into account in the examination and assessment. The refusal of a medical certificate is under number (20).

comment

309

comment by: *NATS National Air Traffic Services Limited*

APPLICATION FORM FOR A MEDICAL CERTIFICATE(26)
The terms used (Tower, Radar, other ATCO) are incorrect. We suggest to use the ratings i.e: ADV / ADI / ACP / ACS / APP / APS

response

Partially accepted

The titles of the boxes will be amended as follows:
ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for the AME in normal cases.
In cases where limitations apply, more specific information on the work

environment will be required on a case by case basis.

comment 310 comment by: NATS National Air Traffic Services Limited

APPLICATION FORM FOR A MEDICAL CERTIFICATE(132 Refusal of pilot/ATCO medical certificate)

The AME is not responsible for issuing, renewing or revalidating the licence, but for issuing, renewing and revalidating the medical certificate.

response Not accepted

This is necessary information of the AME. A licence may be denied for a medical reason (alcohol, drugs, degraded cognitive function etc) which has to be taken into account in the examination and assessment. The refusal of a medical certificate is under number (20).

comment 311 comment by: NATS National Air Traffic Services Limited

APPLICATION FORM FOR A MEDICAL CERTIFICATE(151)

151 does not align with the question asked "do you have or have you had". Furthermore, a woman may be pregnant, but not yet know it, therefore it would be better to ask "are you aware that you are pregnant". Additionally, pregnancy is not an illness, but a "natural" state.

response Not accepted

The question 'are you pregnant' is the standard question of a doctor during an examination or assessment, e.g. before taking an x-ray or before applying a local anaesthetic, or simply when taking the medical history of a female patient depending on age.

If the applicant for a medical certificate is not aware of a pregnancy she will say 'no'. Once an ATCO knows that she is pregnant, she will inform the AME under her obligation of ATCO.MED.A.020 Decrease in medical fitness.

comment 323 comment by: ENAV

**APPLICATION FORM
FOR A MEDICAL
CERTIFICATE(20)**

(26) ...
Current ATCO
activity: Tower o
Radar o Other
ATCO o

The terms are incorrect. We suggest to use the ratings i.e.: ADV / ADI / ACP / ACS / APP / APS

**APPLICATION FORM
FOR A MEDICAL
CERTIFICATE(132)**

Refusal of
pilot/ATCO licence
medical certificate

The AME is not responsible for issuing, renewing or revalidating the licence, but for issuing, renewing and revalidating the medical certificate.

response *Partially accepted*

**APPLICATION FORM
FOR A MEDICAL
CERTIFICATE(151)**

General and
medical history:
Do you have, or
have you ever
had, any of the
following?
151 Are you
pregnant?

151 does not align with the
question asked "do you have or
have you had". Furthermore, a
woman may be pregnant, but
not yet know it, therefore it
would be better to ask "are you
aware that you are pregnant"
Additionally, pregnancy is not an
illness, but a "natural" state.

(26): Accepted but not in the details as proposed in the comment. The titles of the boxes will be amended as follows:

ADI (Tower), APS (Approach) and ACS (Centre). This is enough information for the AME in normal cases.

In cases where limitations apply, more specific information on the work environment will be required on a case by case basis.

(132): Not accepted. This is necessary information of the AME. A licence may be denied for a medical reason (alcohol, drugs, degraded cognitive function etc.) which has to be taken into account in the examination and assessment. The refusal of a medical certificate is under number (20).

(151): Not accepted. The question 'are you pregnant' is the standard question of a doctor during an examination or assessment, e.g. before taking an x-ray or before applying a local anaesthetic, or simply when taking the medical history of a female patient depending on age.

If the applicant for a medical certificate is not aware of a pregnancy she will say 'no'. Once an ATCO knows that she is pregnant, she will inform the AME under her obligation of ATCO.MED.A.020 Decrease in medical fitness.

**ANNEX III, PART-ATCO.OR, REQUIREMENTS FOR AIR TRAFFIC CONTROLLER
TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES, SUBPART B —
GENERAL REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING
ORGANISATIONS — GM1 ATCO.OR.B.010(d)(2) Application for a training
organisation certificate and AMC1 ATCO.OR.B.015(a) Terms of approval and
privileges of a training organisation certificate**

p. 38

comment 24

comment by: ENAC-FRANCE

**ANNEX III
PART-ATCO.OR
REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING
ORGANISATIONS AND AERO-MEDICAL CENTRES**

response	<p><u>Comment:</u> The number of documents to be given to the NSA is very large and the process is very lengthy. The application of the whole process will require significant resources which does not appear to be justified.</p> <p><i>Noted</i></p>
	<p>Without further detailed information, it is not possible to assess the validity of this comment. The various transition periods defined in the subject NPA should allow competent authorities to cope with the new requirements. Part of the current national processes will be replaced by European ones, thus allow for simplifications in certain domains. The involvement of national experts in the Rulemaking Group has allowed to minimise such changes.</p>
comment	<p>57 comment by: <i>skyguide Corporate Regulation Management</i></p>
	<p>GM1 ATCO.OR.B.010(d)(2) The requirements to add the list of ATC units is not relevant in the case of training organisations which do not provide unit and continuation training (e.g. training organisations providing initial training only). Both unit and continuation training take place at the unit.</p>
response	<p><i>Accepted</i></p> <p>The necessary change is undertaken in the text of the GM.</p>
comment	<p>174 comment by: <i>CANSO Civil Air Navigation Services Organization</i></p>
	<p>CANSO proposes the following change to GM1.ATCO.OR.B.010 (d) (2) <i>The requirements to add the list of ATC units is not relevant in the case of training organisations which do not provide unit and continuation training (e.g. training organisations providing initial training only).</i> Continuation training also takes place at the unit.</p>
response	<p><i>Accepted</i></p> <p>The necessary change is undertaken in the text of the GM.</p>
comment	<p>295 comment by: <i>HungaroControl</i></p>
	<p>GM1 ATCO.OR.B.010(d)(2): The requirements to add the list of ATC units is not relevant in the case of training organisations which do not provide unit and continuation training (e.g. training organisations providing initial training only). It also takes place at a unit.</p>

response	Accepted
	The necessary change is undertaken in the text of the GM.
comment	312 comment by: NATS National Air Traffic Services Limited
	GM1 ATCO.OR.B.010(d)(2) Continuation training also takes place at the unit. The requirements to add the list of ATC units is not relevant in the case of training organisations which do not provide unit and continuation training (e.g. training organisations providing initial training only).
response	Accepted
	The necessary change is undertaken in the text of the GM.
comment	334 comment by: ENAV
	GM1 ATCO.OR.B.010(d)(2) The requirements to add the list of ATC units is not relevant in the case of training organisations which do not provide unit and continuation training (e.g. training organisations providing initial training only). Comment: Continuation training also takes place at the unit.
response	Accepted
	The necessary change is undertaken in the text of the GM.

ANNEX III, PART-ATCO.OR, REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES, SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS — Management system p. 38-40

comment	17 comment by: LFV
	Ref AMC1 ATCO.OR.C.001 (d) Management system (f) What is update training? It does not appear anywhere else. Refresher training is well understood and established. Theoretical instructors could be subject matters experts that have no ATCO experience. So in this context it seems unnecessary for those to refresher (update?) training in atc operational practice and might also be of difficulty to "digest". It is proposed to delete "theoretical".

response

Accepted

The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.

comment

23

comment by: *ENAC-FRANCE***AMC1 ATCO.OR.001(d)**

(f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices;

Comment:

The requirement stated here is time consuming and costly. Depending on the the subject taught, this requirement may not be necessary.

Proposal:

(f) their ~~theoretical and~~ practical instructors receive adequate update and refresher training in air traffic control operational practices;

response

Accepted

The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.

comment

28

comment by: *LPS SR***AMC1
ATCO.OR.C.001(d)
Management
system**

A training organisation should demonstrate that:
(f) their ~~theoretical and~~ practical instructors receive adequate update and refresher training in air traffic control operational practices;

The refresher training is adequate by definition. The term is understood. We suggest deleting "theoretical" regarding that some theoretical instructors are not or have not been an ATCO as it is stated also in requirements for theoretical instructors. Therefore they do not receive refresher training in ATC operational practices.

response

Accepted

The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.

comment	52	comment by: <i>Belgocontrol</i>
	<p>GM1 ATCO.OR.C.001(f) Management system</p> <p>How can training management and operational management monitor the correct flow of events and also objectivity if they can no longer be member of the jury board of some assessments? At least one of these management enrolled cooperators (as they have an operational background, being controllers for years and making op ruleds and procedures) should be participator in these jury.</p>	
response	<p><i>Noted</i></p> <p>The fact that the personnel conducting assessments shall comply with the requirements set to this extent (section 3) does not prevent the provisions of ATCO.OR.C.001 to be fulfilled.</p>	
comment	60	comment by: <i>skyguide Corporate Regulation Management</i>
	<p>AMC1 ATCO.OR.C.001 (d)</p> <p>A training organisation should demonstrate that:</p> <p>(f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices;</p> <p>There is provision for some theoretical instructors not to be or have been ATCO as they are subject matter experts. They would therefore not receive refresher training in ATC operational practices. We therefore suggest to delete "theoretical". This is also outside the scope of the BR annex Vb (4) (g) (i). As refresher training is an understood and defined term, and update does not exist elsewhere, and as refresher training should be adequate by definition (as it is within the training organisation management system), we suggest these amendments to the text.</p>	
response	<p><i>Accepted</i></p> <p>The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>	
comment	67	comment by: <i>CAA-NL</i>
	<p>AMC1 to ATCO.OR.C.001.(b) under (b)</p> <p>Safety should have the highest priority up to a certain (high) level, as otherwise any operations might be rendered impossible.</p> <p>For this reason, it is proposed to replace this paragraph with the following: "ensure the achievement of a satisfactory level of safety. To this end, it should establish an agreed level up to which safety is given the highest priority. Beyond the agreed level, safety should be taken into account, however could be balanced against other criteria including commercial, operational, environmental and social ones".</p>	
response	<p><i>Not accepted</i></p>	

The Agency considers that the comment does not take into account the nature of air traffic controller training organisations and the nature of the safety policy in their management system. In this regard use of 'satisfactory level of safety' would reduce the clarity of the proposed AMC and will create difficulties and numerous interpretations when complying with it, therefore, the comment is not accepted.

It is also worth to mention on a general level that the objective of the subject Regulation is clearly to increase safety and to improve the operation of the air traffic control system within the European Union.

comment

68

comment by: CAA-NL

AMC1 to ATCO.OR.C.001(b) under (c)(f):

The word 'good' seems to be somewhat arbitrary and open to interpretation. For this reason, it is proposed to delete it.

response

Accepted

comment

76

comment by: DSNA

AMC1 ATCO.OR.C.001(d) (f)Comment :

The obligation to set up update and refresher training in in air traffic control operational practices , for all theoretical instructors, including for example, experts on specific subjects, would be very expensive to implement. Moreover, it is outside the scope of the **BR Annex Vb (4)(g)(i)**.

Proposal :

(f) their ~~theoretical~~ and practical instructors receive adequate update and refresher training in air traffic control operational practices;

response

Accepted

The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.

comment

88

comment by: DSAC - French NSA

Paragraph

ATCO.D.045 (a) (b)

ATCO.OR.C.001 (e)

AMC ATCO.OR.C.001 (e)

Alternative proposal

(a) Unit training shall consist of **approved** training course(s) for each unit endorsement established at the ATC unit as defined in the **approved** unit

	<p>training plan.</p> <p>(b) The unit endorsement course(s) plan(s) shall be developed and provided by approved training organisations and approved by the competent authority according to ATCO.D.060 ATCO.D.055.</p> <p><u>Justification</u></p> <p>As in the current regulation, the competent authority shall approve the unit training plan and not only the unit training course. The approval of the each unit training course will be done through the approval of the unit training plan.</p> <ul style="list-style-type: none"> - In the current regulation, the competent authority approves unit training plans and not unit training courses. - As is the case within the current regulation, the approval of unit training plan taking into account the unit training course(s) will lead to an approval of all the contained unit training courses. - The approval only of the unit training courses will lead to a much less consistent monitoring of the unit training process, compared to the monitoring of the unit competence scheme. - The monitoring of some processs, for example the assessment within the unit training plan, would be more relevant through the approval of the unit training plan than through the monitoring of the training organisation.
response	<p><i>Noted</i></p> <p>The comment does not relate to AMC ATCO.OR.C.001 (e). Therefore it is noted.</p>
comment	<p>89</p> <p>comment by: <i>DSAC - French NSA</i></p> <p><u>Paragraph</u></p> <p>ATCO.OR.B.010 (d) (5)</p> <p>ATCO.OR.C.001 (e)</p> <p>AMC ATCO.OR.C.001 (e)</p> <p><u>Alternative proposal</u></p> <p>ATCO.OR.B.010 (d) (5)</p> <p>(5) a list of training courses plan(s) and/or service(s) provided;</p> <p><u>Justification</u></p> <p>The certificate of the training organisation shall refer to the unit training plan provided with all contained training courses.</p> <ul style="list-style-type: none"> - In the current regulation, the competent authority approves unit training plans and not unit training courses and the certificate issued for training organisations is based also on the unit training plans defined by the training organisation. - The reduction of the scope of activities of the training organisations monitored by the competent authority to unit training courses, leaving all other aspects of the unit training plan (structure of the unit training, processes, training methods, appeal process, abnormal and emergency situations, assessments...) will lessen the monitoring of the training by the competent authority. - The link between unit training plans and unit training courses within the monitoring of the training organisations is not clear in the NPA.
response	<p><i>Noted</i></p> <p>The comment does not relate to AMC ATCO.OR.C.001 (e). Therefore it is noted.</p>

comment	168	comment by: NATS National Air Traffic Services Limited
	<p>AMC1 ATCO.OR.C.001 Management system The proposed AMC reads more as GM. Change: 'AMC1 ATCO.OR.C.001' to 'GM1 ATCO.OR.C.001'</p>	
response	Accepted	

comment	169	comment by: NATS National Air Traffic Services Limited
	<p>AMC1 ATCO.OR.C.001 Management system Whilst it is understood that ideally the MS provisions for an ANSP across the various domains should be identical (except for sector specific differences) these requirements are significantly different to those currently proposed in draft rules for ATM/ANS. Given that training organisations could well be operated by ANSPs there is a need for a degree of consistency across the rules. Suggest that MS provisions for Training Organisations should be aligned between OR requirements for this regulation and the existing and proposed ATM/ANS regulations.</p>	
response	<p>Noted</p> <p>The Agency agrees with the recommendation of a 'total system approach' suggested by the commentator. ATM/ATS regulations are under development and the Agency fully supports the consistency between rules. For that purpose the comment is noted.</p>	

comment	172	comment by: CANSO Civil Air Navigation Services Organization
	<p>CANSO proposes the following change to AMC1 ATCO.OR.C.001 (d) <i>A training organisation should demonstrate that:</i> <i>(f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices;</i> The refresher training is an understood term, whereas update does not exist elsewhere and the refresher training should be adequate by definition (as it is within the training organisation management system). Some theoretical instructors are not and have not been ATCO, they are subject matter experts. Therefore they do not receive refresher training in ATC operational practices. We therefore suggest to delete "theoretical". This is also outside the scope of the BR annex Vb (4)(g)(i).</p>	
response	<p>Accepted</p> <p>The AMC in this regard is redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>	

comment	193	comment by: FABEC
	<p>FABEC proposes to change AMC1 ATCO.OR.C.001(d) as follows. A training organisation should demonstrate that: (...) (f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices; (g) periodical assessment of their personnel is performed. <i>Various theoretical instructors are subject matter experts in areas, where the knowledge of ATC operational practices is not needed (e.g. meteorology, law, etc.).</i> <i>The basic regulation doesn't require operational refresher training for theoretical instructors.</i> <i>Theoretical instructors should have /and demonstrate a specific ATM-knowlegde - without the need for 'refresher training in air traffic control operational practices'.</i></p>	
response	<p><i>Accepted</i></p> <p>The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>	
comment	291	comment by: EUROCONTROL
	<p>AMC1 ATCO.OR.C.001:</p> <p>It is a positive step that the management system of an ANSP could be considered as an AMC against the provision for training organisations that are also ATC units.</p>	
response	<p><i>Noted</i></p>	
comment	298	comment by: HungaroControl
	<p>AMC1 ATCO.OR.C.001(d) Management system: A training organisation should demonstrate that: (f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices; Some theoretical instructors are not ATCOs.</p>	
response	<p><i>Accepted</i></p> <p>The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>	
comment	314	comment by: NATS National Air Traffic Services Limited

	<p>AMC1 ATCO.OR.C.001(d) Management system The refresher training is an understood term, whereas update does not exist elsewhere and the refresher training should be adequate by definition (as it is within the training organisation management system). Some theoretical instructors are not and have not been ATCO, they are subject matter experts. Therefore they do not receive refresher training in ATC operational practices. We therefore suggest to delete "theoretical". This is also outside the scope of the BR annex Vb (4)(g)(i). Suggested text: A training organisation should demonstrate that: (f) their practical instructors receive refresher training in air traffic control operational practices</p>
response	<p><i>Accepted</i></p> <p>The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>

comment	<p>336 comment by: ENAV</p>
	<p>AMC1 ATCO.OR.C.001(d) Management system A training organisation should demonstrate that: (f) their theoretical and practical instructors receive adequate update and refresher training in air traffic control operational practices; Comment: The refresher training is an understood term, whereas update does not exist elsewhere and the refresher training should be adequate by definition (as it is within the training organisation management system). Some theoretical instructors are not and have not been ATCO, they are subject matter experts. Therefore they do not receive refresher training in ATC operational practices. We therefore suggest to delete "theoretical". This is also outside the scope of the BR annex Vb (4)(g)(i).</p>
response	<p><i>Accepted</i></p> <p>The AMC in this regard in redrafted to take into account the changes undertaken concerning the instructor and assessors requirements.</p>

ANNEX III, PART-ATCO.OR, REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES, SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS — Personnel requirements	p. 42-43
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comment	<p>14 comment by: LFV</p>
	<p>Ref AMC1 ATCO.OR.C.010(f) The minimum number of OJTI instruction hours is far too strict and should</p>

response

instead be developed in dialog with the CA. It is probably less a problem at big units across Europe, but can constitute a major obstacles for hundreds of smaller ATS units across Europe, with few ATCOs and where there are seldom inflow of new trainees. To stipulate a minimum number of instructional hours may not be the only means to cater for quality and safety of an OJTI.

Accepted

Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.

comment

27

comment by: LPS SR

**AMC1
ATCO.OR.C.010(f)
Personnel
requirements**

In order to maintain their competence STDIs should perform a minimum of 50 number of hours of instruction as defined in the training organisation management system per year.

Stipulating the number of hours is not flexible. Each training organisation should be allowed to define the numbers according to their needs and best practices, which will be approved by the CAA.

response

Accepted

Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.

comment

58

comment by: skyguide Corporate Regulation Management

AMC1 ATCO.OR.C.010(f)

In order to maintain their competence STDIs should perform a minimum of 50 number of hours of instruction as defined in the training organisation management system per year.

Comment: Having the number of hours and assessments stipulated in AMC is too inflexible and does not allow for the different units, their sizes and complexities. Each training organisation should be allowed to define these numbers according to their needs and best practices. This will be approved by the CA, in any case. Furthermore, it is outside the scope of the BR 216 Vb (4) (g) (ii). This amendment is coherent with the comments to ATCO.C.020, ATCO.C.040 and ATCO.C.060.

response

Accepted

Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.

comment

119

comment by: *Maastricht UAC*

AMC1
ATCO.OR.C.010(f)
Personnel
requirements

Stipulating the number of hours and assessments in AMC is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and best practices.

Proposed text: In order to maintain their competence STDIs should perform a minimum number of 50 hours of instruction per year. The number of hours will be defined in the UCS.

response

Accepted

Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.

comment

136

comment by: *Maastricht UAC Training Organisation*

**Paragraph
identification:**

Justification:

Alternative proposal:

AMC1
ATCO.OR.C.010(f)
Personnel
requirements

Stipulating the number of hours and assessments in AMC is too inflexible and does not allow for the different units / sizes / complexities. Each unit should be allowed to define these numbers according to their needs and

Proposed text: In order to maintain their competence STDIs should perform a minimum number of 50 hours of instruction per year. The number of hours will be defined in

		best practices.	the UCS.
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>		
comment	171	comment by: <i>CANSO Civil Air Navigation Services Organization</i>	
	<p>CANSO proposes the following change to AMC1 ATCO.OR.C.010(f): <i>In order to maintain their competence STDIs should perform a minimum of 50 number of hours of instruction as defined in the training organisation management system per year.</i> Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA). also in line with the comments on ATCO.C.020; ATCO.C.040 and ATCO.C.060. and it is outside the scope of the BR annex Vb(4)(g)(ii).</p>		
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>		
comment	182	comment by: <i>CANSO Civil Air Navigation Services Organization</i>	
	<p>CANSO proposes to delete AMC1 ATCO.OR.C.010 (f). Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit or training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)</p>		
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>		

comment	191	comment by: FABEC
	<p><i>FABEC request to delete AMC1 ATCO.OR.C.010(f) to maintain consistency with ATCO.C.010. Currency standards for STDI should be defined by training organizations and approved by CA.</i></p> <p>In order to maintain their competence STDIs should perform a minimum of 50 hours of instruction per year.</p>	
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>	
comment	198	comment by: UK CAA
	<p>Page No: 42 Paragraph No: GM1 ATCO.OR.C.010(b);(c) Personnel requirements Comment: The use of job titles and the manner of expression used in the text could be given a prescriptive interpretation. A person nominated to be responsible for training should have extensive experience in training and instructing but not necessarily for all types of ATC training, especially as he/she could be delegating functions to an ATC Instructor. Justification: Replacement of terms that could carry an unintentional prescriptive interpretation. Proposed Text: Replace paragraphs (a) to (d) (3) with the following: “(a) A training organisation may/should nominate a person who has extensive experience in instructing, ideally in all types of ATC training and possess sound managerial capability and will be responsible for training. (b) Typical function and responsibilities for training may be: (1) to have overall responsibility for ensuring satisfactory integration of all training provided and for supervising the progress of the persons undertaking training; (2) to be responsible for coordinating and delegating the contact to the competent authority in training-related issues; and (3) to be ultimately responsible to the accountable manager. (c) Training organisations may nominate a person who has extensive experience in instructing for all types of ATC training and possess sound managerial capability and will be responsible for: (1) ensuring the satisfactory delivery of training and for supervising the progress of the persons undertaking training, in the areas that have been delegated by the person responsible for training.”</p>	
response	<p><i>Not accepted</i></p> <p>The Agency believes that the provisions related to the responsibilities and job titles are exposed in a generic manner, based on the current practices throughout stakeholders and training organisations, and that they should be interpreted as a guidance, not preventing from other possibilities to be established. Therefore, the proposal made by the commentator is not accepted.</p>	

comment	236	comment by: <i>SINCTA - Portuguese Air Traffic Controllers' Union</i>
	<p>AMC1 ATCO.C.010(f) The minimum number of hours should be established by the TO as already established in other SINCTA's comment. Proposed text: In order to maintain their competence STDIs should perform a minimum of 50 hours of instruction per year.</p>	
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>	
comment	258	comment by: <i>USCA</i>
	<p style="text-align: center;">AMC1 ATCO.OR.C.010(f)</p> <p>The minimum number of hours should be established by the Traing Organisation. (f) In order to maintain their competence STDIs should perform a minimum of 50 hours of instruction per year. Training organisations shall define the minimum number of hours to work as STDI in order to revalidate the STDI endorsement.</p>	
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>	
comment	270	comment by: <i>Belgocontrol Training Centre</i>
	<p>Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit or training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)</p>	
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>	
comment	276	comment by: <i>HungaroControl</i>
	<p>AMC1 ATCO.OR.C.010(f) Personnel requirements:</p>	

response	<p>In order to maintain their competence STDIs should perform a minimum of 50 hours of instruction per year. The unit should define the numbers according to their size and training needs.</p> <p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>
comment	<p>306 <i>comment by: NATS National Air Traffic Services Limited</i></p>
response	<p>AMC1 ATCO.OR.C.010(f) Personnel requirements Stipulating the number of hours and assessments is too inflexible and does not allow for the different units/sizes/complexities. Each unit or training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA) Suggest deleting AMC1 ATCO.OR.C.010(f)</p> <p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>
comment	<p>315 <i>comment by: NATS National Air Traffic Services Limited</i></p>
response	<p>AMC1 ATCO.OR.C.010(f) Personnel requirements Stipulating the number of hours and assessments is too inflexible and does not allow for the different units/sizes/complexities. Each training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA). Also in line with the comments on ATCO.C.020; ATCO.C.040 and ATCO.C.060. and it is outside the scope of the BR annex Vb(4)(g)(ii). In order to maintain their competence STDIs should perform a minimum number of hours of instruction as defined in the training organisation management system per year.</p> <p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>
comment	<p>331 <i>comment by: ENAV</i></p>
	<p>AMC1 ATCO.OR.C.010(f) Personnel requirements In order to maintain their competence STDIs should perform a minimum of 50 hours of instruction</p>

	<p>per year. Comment: Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each unit or training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA)</p>
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>

comment	<p>337</p> <p>comment by: ENAV</p>
	<p>AMC1 ATCO.OR.C.010(f) Personnel requirements In order to maintain their competence STDIs should perform a minimum of 50 number of hours of instruction as defined in the training organisation management system per year Comment: Stipulating the number of hours and assessments is too inflexible and does not allow for the different units / sizes / complexities. Each training organisation should be allowed to define these numbers according to their needs and best practices. (which will be approved by the CA). also in line with the comments on ATCO.C.020; ATCO.C.040 and ATCO.C.060. and it is outside the scope of the BR annex Vb(4)(g)(ii).</p>
response	<p><i>Accepted</i></p> <p>Taking into account the comments received regarding the revalidation requirements for the STDI endorsement the requirement concerning the minimum number of hours is deleted.</p>

ANNEX III, PART-ATCO.OR, REQUIREMENTS FOR AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS AND AERO-MEDICAL CENTRES, SUBPART C — MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING ORGANISATIONS — Facilities p. 43-44

comment	<p>16</p> <p>comment by: LFV</p>
	<p>Ref AMC1 ATCO.OR.C.015 (c) Facilities; Specifications for synthetic training devices (b) The requirements in (9) and (10) are not able to measure and are also the result of the other criterias. Suggests deletion. Furthermore suggests rephrasing: "Training organisations should demonstrate how the STD will meet the stated objectives of the practical training exercises and enable the performance objectives to be assessed to the level determined in the training programme."</p>

response	<p><i>Accepted</i></p> <p>The suggested deletion is accepted and the proposal for rephrasing is taken into consideration.</p>
comment	<p>18 comment by: <i>LFV</i></p> <p>Ref AMC1 ATCO.OR.C.015(c) Facilities; Specifications for synthetic training devices (c) It is not clear what high fidelity means.</p>
response	<p><i>Accepted</i></p> <p>The term 'high-fidelity simulator' is deleted and only the description is maintained, which provides the necessary clarity.</p>
comment	<p>33 comment by: <i>ENAC-FRANCE</i></p> <p>ATCO.OR.C.015 Facilities (c) The training organisation shall ensure that the synthetic training devices comply with the applicable specifications and requirements appropriate to the task.</p> <p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (b) STD criteria If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training. demonstration and the related documentation should include the following relevant criteria: (1) the general environment, which should provide an environment in which STD exercises may be run without undue interference from unrelated activities; (2) the STD layout; (3) the equipment provided; (4) the display presentation, functionality, and updating of operational information; (5) data displays, including strip displays, where appropriate; (6) coordination facilities; <u>Comment:</u> It would be a burden to need an SDT approval for each training plan, as we have several training plans on the same domains, requiring the same simulator. Furthermore, it is difficult to link each training objectives to the simulator performance. We would rather get a certificate for each tool according to the type of environment needed for each kind of domain <u>Proposal</u> AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES b) STD criteria If a synthetic training device (STD) is used for training, it should be approved</p>

response

by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training. demonstration and the related documentation should include the following relevant criteria:

- (1) the general environment, which should provide an environment in which STD exercises may be run without undue interference from unrelated activities;
- (2) the STD layout;
- (3) the equipment provided;
- (4) the display presentation, functionality, and updating of operational information;
- (5) data displays, including strip displays, where appropriate;
- (6) coordination facilities;

Not accepted

A training plan subject for approval shall contain training objectives. In case a STD is needed to fulfil these objectives, its performance shall be adequate for the training linked to the objective, so it is ensured that the objective can be achieved. Therefore the Agency believes that the proposed text should not be modified.

comment

59

comment by: skyguide Corporate Regulation Management

AMC1 ATCO.OR.C.015 (c)

(b) STD criteria

If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training meet the stated objectives of the practical training exercises and enable the performance objectives to be assessed to the level determined in the training programme. This demonstration and the related documentation should include the following relevant criteria:

...

~~(9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises;~~

~~(10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme;~~

The result of the requirements 1-8 and 11-13 is demonstrated by 9 and 10. There are no measurable criteria on (9) and (10) alone.

(c) When an STD is used for pre-OJT and the training time is counted as operational training, the STD should be a simulator, meaning a working position including all equipment and computer programs necessary to represent the main tasks associated with that position. In the case of a working position at a tower unit, it includes an out of the tower view the STD classification should be equivalent to high fidelity simulator, meaning a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out of the tower view.

As there is no definition for high fidelity, we suggest re-wording this provision.

(c) (9) (10)

~~9) the ability of the simulated environment to enable meeting the stated~~

	<p>objectives of the practical training exercises; 10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme; To prove the ability to meet objectives of a training plan is not feasible. There is a lack of measurable criteria. It is sufficient when the simulator as such is approved. The competent authority will verify the proper level of simulation in a regular audit / inspection scheme.</p>
response	<p><i>Partially accepted</i></p> <p>(b)(9)(10) The suggested deletion is accepted and the proposal for rephrasing is taken into consideration. (c) The term 'high-fidelity simulator' is deleted, as proposed. However, the Agency maintains requiring of a full-size replica of a working position to represent the full tasks associated with that position. (c)(9)(10) There are no subparagraphs in (c).</p>
comment	<p>69 comment by: CAA-NL</p> <p>AMC 1 to ATCO.OR.C.015.(c) point (b), after 13: This seems to be somewhat vague for regulatory purposes. Furthermore, a basis at IR-level would probably required to determine the adequacy of the STD. For this reason, it is proposed to develop and introduce unambiguous requirements to determine the adequacy of an STD at IR-level.</p>
response	<p><i>Not accepted</i></p> <p>The Agency believes that the current lack of standards for the certification of simulators and STDs make it necessary to establish AMC instead of IR, which allows some flexibility demanded by stakeholders.</p>
comment	<p>77 comment by: DSNA</p> <p>AMC1 ATCO.OR.C.015 (c) (b).</p> <p>STD certification should be included in training organisation certificates, rather than training plan or UCS.</p> <p>There are no measurable criteria to demonstrate items (9) and (10). The proof comes from experiment. Items (9) and (10) are more the result of all the other items, and should be removed from the list of criteria.</p>
response	<p><i>Partially accepted</i></p> <p>Paragraph (b) is reworded and (b)(9) and (10) are deleted.</p>

comment

93

comment by: DSAC - French NSA

Paragraph

AMC1 ATCO.OR.C.015 (c)

Alternative proposal

(b) STD criteria

If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training. This demonstration and the related documentation should include the following relevant criteria:

- (1) the general environment, which should provide an environment in which STD exercises may be run without undue interference from unrelated activities;
- (2) the STD layout;
- (3) the equipment provided;
- (4) the display presentation, functionality, and updating of operational information;
- (5) data displays, including strip displays, where appropriate;
- (6) coordination facilities;
- (7) aircraft performance characteristics, including the availability of manoeuvres, e.g. holding or instrumental landing system (ILS) operation, required for a particular simulation;
- (8) the availability of real-time changes during an exercise;
- ~~(9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises;~~
- ~~(10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme;~~
- (9) the different type of ATC situations and configurations that can be played through the STD : type of traffic, complexity of traffic, stand-alone or collapsed sectors, unusual and degraded situations, coordinated positions
- (11) the processes by which the training organisation can be assured that staff associated with the training conducted with the use of an STD are competent;
- (12) the degree of realism of any voice recognition system associated with the STD;
- (13) where a simulator is an integral part of an operational ATC system, the processes by which the training organisation is assured that interference between the simulated and operational environments is prevented.

The extent to which the STD achieves the above criteria will be used to determine the adequacy of the STD for the proposed use. As a general principle, the greater the degree of replication of the operational position being represented the greater the use will be possible for any particular training.

Justification

It is difficult to describe as such the ability of the simulated environment to meet the stated objectives of the practical training exercises. It would be more relevant for the training organisation to describe what type of ATC situation and/or configuration can be played on the STD that will enable them to train or not the ATCOs on various ATC situations.

response

Partially accepted

Paragraph (b) is reworded and (b)(9) and (10) are deleted.

comment	<p>173 comment by: <i>CANSO Civil Air Navigation Services Organization</i></p> <p>CANSO proposes the following change to AMC1 ATCO.OR.C.015 (c): <i>STD criteria</i> <i>If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training meet the stated objectives of the practical training exercises and enable the performance objectives to be assessed to the level determined in the training programme. This demonstration and the related documentation should include the following relevant criteria:</i></p> <p>...</p> <p>(9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises; (10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme; The demonstration of (9) and (10) is the result of the other requirements (1-13). There are no measurable criteria on (9) and (10) alone.</p>
response	<p><i>Accepted</i></p> <p>The suggested deletion is accepted and the proposal for rephrasing is taken into consideration.</p>
comment	<p>175 comment by: <i>CANSO Civil Air Navigation Services Organization</i></p> <p>CANSO proposes the following change to AMC1 ATCO.OR.C.015 (c): <i>When an STD is used for pre-OJT and the training time is counted as operational training, the STD classification should be equivalent to high fidelity simulator, meaning the STD should be a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out-of-the-tower view.</i> 'Equivalent to high fidelity' is not defined.</p>
response	<p><i>Accepted</i></p> <p>The term 'high-fidelity simulator' is deleted and only the description is maintained, which provides the necessary clarity.</p>
comment	<p>188 comment by: <i>FABEC</i></p> <p>FABEC proposes to change AMC1 ATCO.OR.C.015 as follows: When an STD is used for pre-OJT and the training time is counted as operational training, the STD classification should be equivalent to high fidelity simulator, meaning a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out-of-the tower view.</p>

response	<p>to:</p> <p>The STD should be a simulator, meaning a working position including all equipment and computer programs necessary to represent the main tasks associated with that position. In the case of a working position at a tower unit, it includes an out of the tower view.</p> <p><i>'High fidelity simulator' is not defined and should not be used in AMC material.</i></p> <p><i>Partially accepted</i></p> <p>The term 'high-fidelity simulator' is deleted, as proposed. However, the Agency maintains requiring of a full-size replica of a working position to represent the full tasks associated with that position.</p>
comment	<p>189 comment by: FABEC</p> <p>FABEC proposes to change AMC1 ATCO.OR.C.015 as follows:</p> <p>...</p> <p>9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises;</p> <p>10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme;</p> <p>...</p> <p><i>To prove the ability to meet objectives of a training plan is not feasible. There is a lack of measurable criteria.</i></p> <p><i>It is sufficient when the simulator as such is approved.</i></p> <p><i>The competent authority will verify the proper level of simulation in a regular audit / inspection scheme.</i></p> <p>response <i>Accepted</i></p> <p>The suggested deletion is accepted.</p>
comment	<p>292 comment by: EUROCONTROL</p> <p>AMC1 ATCO.OR.C.015 (c) (b) :</p> <p>The list of criteria should be separated for PTT and SIM.</p> <p>response <i>Not accepted</i></p> <p>Since the criteria need to be fulfilled with regard to the particular STD used, the Agency considers that there is no need for establishing separate set of criteria for simulators and part-task trainers.</p>
comment	<p>296 comment by: HungaroControl</p> <p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (b): STD criteria</p>

	<p>If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training <u>meet the stated objectives of the practical training exercises and enable the performance objectives to be assessed to the level determined in the training programme.</u> This demonstration and the related documentation should include the following relevant criteria:</p> <p>...</p> <p>(9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises;</p> <p>(10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme;</p> <p>The demonstration of (9) and (10) is the result of the other requirements (1-13). There are no measurable criteria on (9) and (10) alone.</p>
response	<p><i>Accepted</i></p> <p>The suggested deletion is accepted and the proposal for rephrasing is taken into consideration.</p>
comment	<p>297 comment by: <i>HungaroControl</i></p> <p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (c): When an STD is used for pre-OJT and the training time is counted as operational training, the STD classification should be equivalent to high-fidelity simulator, meaning the STD should be a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out-of-the-tower view. Equivalent to high fidelity is not defined.</p>
response	<p><i>Accepted</i></p> <p>The term 'high-fidelity simulator' is deleted and only the description is maintained, which provides the necessary clarity.</p>
comment	<p>313 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (b) The demonstration of (9) and (10) is the result of the other requirements (1-13). There are no measurable criteria on (9) and (10) alone. STD criteria If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will meet the stated objectives of the practical training exercises and enable the</p>

	<p>performance objectives to be assessed to the level determined in the training programme. This demonstration and the related documentation should include the following relevant criteria:.....</p>
response	<p><i>Accepted</i></p> <p>The suggested deletion is accepted and the proposal for rephrasing is taken into consideration.</p>
comment	<p>316 comment by: NATS National Air Traffic Services Limited</p>
	<p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (c) Equivalent to high fidelity is not defined. When an STD is used for pre-OJT and the training time is counted as operational training, the STD should be a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out-of-the-tower view.</p>
response	<p><i>Accepted</i></p> <p>The term 'high-fidelity simulator' is deleted and only the description is maintained, which provides the necessary clarity.</p>
comment	<p>335 comment by: ENAV</p>
	<p>AMC1 ATCO.OR.C.015(c) Facilities SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES (b) STD criteria If a synthetic training device (STD) is used for training, it should be approved by the competent authority as part of the course approval process for any training plan. Training organisations should demonstrate how the STD will provide adequate support for a particular kind of training meet the stated objectives of the practical training exercises and enable the performance objectives to be assessed to the level determined in the training programme. This demonstration and the related documentation should include the following relevant criteria: ... (9) the ability of the simulated environment to enable meeting the stated objectives of the practical training exercises; (10) the ability of the simulator and its exercises to enable the performance objectives to be assessed to the level determined in the training programme; Comment: The demonstration of (9) and (10) is the result of the other requirements (1-13). There are no measurable criteria on (9) and (10) alone.</p>
response	<p><i>Accepted</i></p> <p>The suggested deletion is accepted and the proposal for rephrasing is taken into</p>

consideration.

comment

338

comment by: ENAV

**AMC1 ATCO.OR.C.015(c) Facilities
SPECIFICATIONS FOR SYNTHETIC TRAINING DEVICES
(c)**

When an STD is used for pre-OJT and the training time is counted as operational training, ~~the STD classification should be equivalent to high fidelity simulator, meaning~~ the STD should be a full size replica of a working position, including all equipment and computer programmes necessary to represent the full tasks associated with that position. In the case of a working position at a tower unit, it includes an out-of-the-tower view.

Comment: Equivalent to high fidelity is not defined.

response

Accepted

The term 'high-fidelity simulator' is deleted and only the description is maintained, which provides the necessary clarity.

2. Extracts of resulting text

For the extracts of the resulting text please refer to **Annex B.IV(b)** published at <http://easa.europa.eu/rulemaking/comment-response-documents-CRDs-and-review-groups.php>

3. Appendix A — Attachments

 [EASA NPA 2012-18 ATCEUC Comments finaldocx.pdf](#)

Attachment #1 to comment [#212](#)