



European Aviation Safety Agency  
**Comment-Response Document 2015-14**

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**Appendix 1**  
**to ED Decision 2016/023/R**

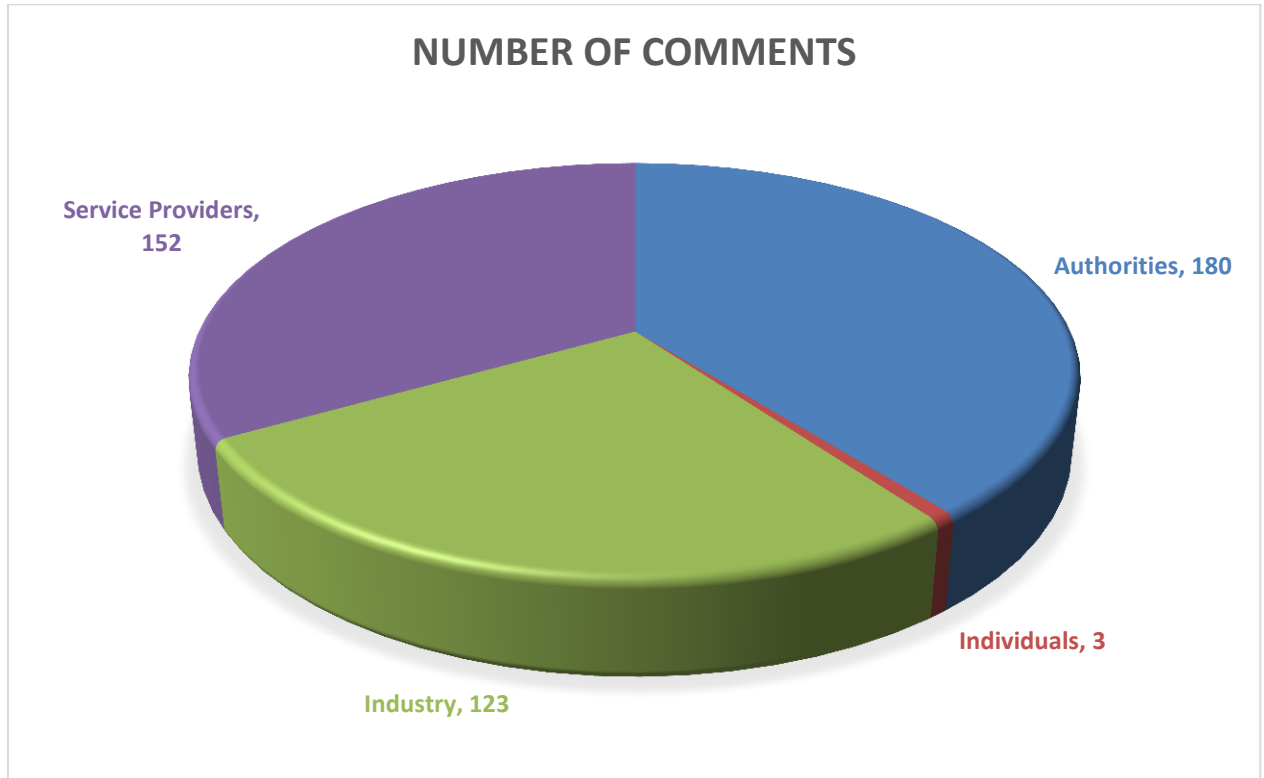
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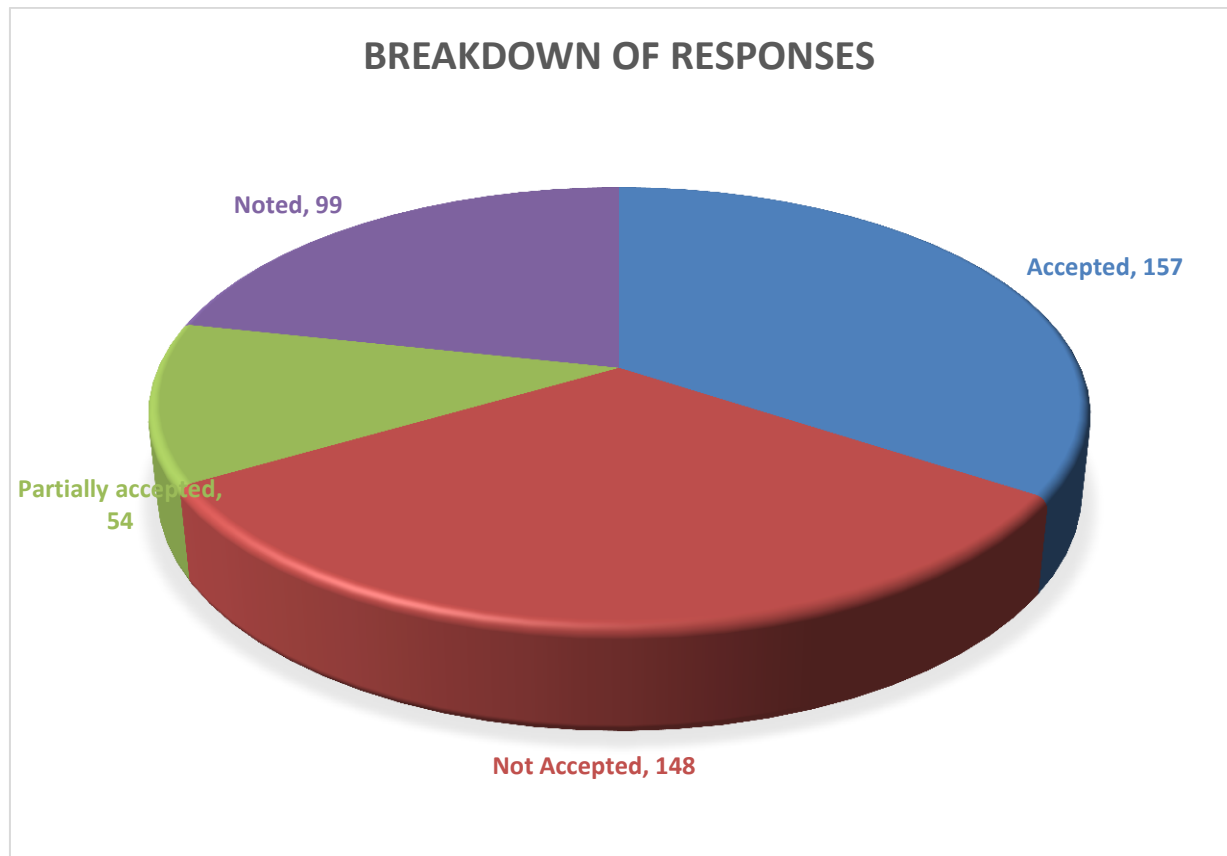


**1. Summary of the outcome of the consultation**

In total, 458 individual comments were received by 39 commentators. The figure below shows the distribution and statistics of comments and type of commentators.



Based on the review of the comments, the Agency has provided the following responses to the comments: accepted, partially accepted, not accepted, noted. The figure below illustrates the breakdown of the Agency’s responses.



Based on the comments accepted, some changes to the proposed AMC/GM were introduced. The most significant changes are summarised below. Section 3 of this CRD contains individual responses to the comments.

#### General comments

Comments were provided regarding the length of the consultation period. The Agency had considered this in advance and extended the consultation period twice taking into account the adoption of the final text of the Implementing Rule.

In this section, the stakeholders also called for a consolidated, easy-access version of the whole Implementing Rule and the associated AMC/GM, which the Agency has committed to provide once the Rule is complete. In addition, a cross-reference document containing references to respective ICAO provisions will be created.

#### Overview of the proposed amendments

NPA 2015-14 contained two questions for the stakeholders:

- Issue 1, Inclusion of Attachment B to ICAO Annex 2
- Issue 2, GM1 to SERA.5005(c)(3)(iii) Night VFR on top

The majority of the comments did not support the inclusion of Attachment B of ICAO Annex 2 and therefore it will not be included. The GM regarding Night VFR on top will be introduced since the stakeholders were asking explicitly more guidance on the issue.



#### GM1 SERA.5005(c)(3)(iii) Visual flight rules NIGHT VFR ON TOP

When flying in airspace classes B, C, D, E, F, or G, more than 900 m (3 000 ft) above mean sea level (MSL) or 300 m (1 000 ft) above terrain, whichever is higher, the pilot may elect to fly above a cloud layer (VFR on top). When making the decision on whether to fly above or below a cloud at night, consideration should be given at least but not limited to the following:

- (a) The likelihood of weather at destination allowing a descent in visual conditions;
- (b) Lighting conditions below and above the cloud layer;
- (c) The likelihood of the cloud base descending, if flight below cloud is chosen, thus resulting in terrain clearance being lost;
- (d) The possibility of flight above the cloud leading to flight between converging cloud layers;
- (e) The possibility of successfully turning back and returning to an area where continuous sight of surface can be maintained; and
- (f) The possibilities for the pilot to establish their location at any point of the route to be flown, taking into consideration also the terrain elevation and geographical and man-made obstacles.

#### AMC1 SERA.4001(c) Submission of a flight plan

A text change was introduced based on the comments received for the sake of clarity. The resulting text will read as follows:

‘In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).’

#### GM1 SERA.4005(a) Contents of a flight plan

Based on the comments, the subtitle of the GM will be changed to read:

INFORMATION ~~FOR~~ ABOUT THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE

#### AMC and GM to SERA.7002

The AMC and GM to SERA.7002 ‘Collision hazard information when ATS based on surveillance are provided’ received a great number of comments. As a result, it was decided to revise the respective provisions. The changes can be found in the resulting text annexed to the Decision.

#### AMC2 SERA.11005 Unlawful interference

This AMC will be changed to a GM.



AMC1 SERA.11005 Unlawful interference

This AMC will be supported by a new GM:

Verbal reference to unlawful interference should not be made by the controller unless it is first made by the pilot in a radio communication transmission, since it might attract the attention of the hijacker (or of other aircraft) and have detrimental consequences.

GM1 SERA.11014 ACAS resolution advisory (RA)

Based on the comments, this GM will be removed

GM1 SERA.14090(b) Specific communication procedures

This GM was removed and associated with Article 2(27).



## 2. Individual comments and responses

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

- (a) **Accepted** — EASA agrees with the comment and any proposed amendment is wholly transferred to the revised text.
- (b) **Partially accepted** — EASA either agrees partially with the comment, or agrees with it but the proposed amendment is only partially transferred to the revised text.
- (c) **Noted** — EASA 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 EASA.

### (General Comments)

-

comment

3

comment by: *skyguide Corporate Regulation Management*

We find inappropriate the principle of splitting the ICAO PANS-ATM (and occasionally ICAO Annexes) into separate legal levels (and separate documents) based solely on "shall/should" formulations. Specifically, in PANS-ATM the procedures defined as "shall" and those as "should" are kept one next to each other, in meaningful blocks of "standardized" (to greater or lesser extent) practices. Having the issue of "level of standardization" in mind, it is important to note the way that ICAO defines the difference between a "shall" and a "should" statement for the PANS-ATM (Doc 8143-AN/873/3):

*a) The verb "shall" is to be used where uniform application is essential;*

*b) The verb "should" is to be used where variation in detail would not be an impediment to successful application*

As is visible from the ICAO principles above, as well as from the structure and context of PANS-ATM, the "shall" and "should" statements form together the "standardized" practices, where the difference between the two is only in openness for variation in detail.

However, in the EASA approach, where "shall" statements are published in the form of a Regulation, while the "should" statements are published in the form of Guidance Material, the organic functional unity of these two types of expressions is lost. Further, and more importantly, the level of "standardization" that ICAO, achieves with "should" statements may be (in the context of Guidance Material) entirely lost, and there should be a valid concern that such an approach by EASA may lead to proliferation of practices across European ATM which may, in itself, be an impediment to safety.

In conclusion of this general comment, we would, again, invite EASA to re-think the regulatory concept they apply when transposing PANS-ATM into EC legislative framework, not to allow the risks indicated above, and not to miss the objectives ICAO already achieves.

response

Noted

The transposition principles are according to the mandate given by the European Commission and endorsed by the Member States.



In terms of scope, the mandate is based on the SES Regulatory Framework and some provisions of the EASA Basic Regulation. It encompasses ICAO Annex 2 'Rules of the Air' and other ICAO Standards and Recommended Practices (SARPs) and Procedures for Air Navigation Services (PANS), later supplemented by material from other relevant ICAO annexes. The implementing rule (IR) does not create new obligations but rather transposes already existing obligations, and standardises the way the existing ICAO obligations are implemented within the single European sky.

comment	4	comment by: <i>European Transport Workers Federation - ETF</i>
	ETF finds it difficult to comment on those proposals at this point because of the uncertainty around the adoption of the IR currently under scrutiny in the comitology procedure. In coordination with CANSO and ATCEUC, we are requesting some clarification around this issue before proper consultation can happen.	
response	Accepted	
	The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.	
comment	14	comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i>
	The uncertainty around the adoption of the IR is not allowing the correct analysis of SERA Part C AMC & GM. Stakeholders are adding comments to the proposed AMC & GM while the rule itself is still not on its final version.	
response	Accepted	
	The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.	
comment	27	comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i>
	<p>The Agency should revise the measurement units throughout the whole appendix, particularly with regards to vertical and horizontal distance, vertical and horizontal speed, since in European ATC environment we don't talk about metres, kilometres, metres per second or km/h, but about FEET, (nautical) MILES, FEET PER SECOND and KNOTS.</p> <p>Wherever these measures apply, it would be more reasonable to either delete the first ones or put them in brackets, so that they don't look like the first option.</p> <p>We understand there's no intend to make any changes to ICAO provision unless necessary, but being as it is intended to the European environment, and because it might lead to confusion, we insist on adapting the text to Europe instead of maintaining the ICAO one.</p>	
response	Not accepted	
	<p>The original ICAO text will be retained.</p> <p>The EU competent authority may decide to agree on such proposals regarding the units to be used in the applicable regulatory material. However, it should be noted that such a decision</p>	



cannot apply to the phraseology only and that the application of this principle would also impact the SERA IR. Even more, beyond the SERA IR and for consistency, it would probably mean an in-depth review of the whole set of relevant regulations. This has not been done yet and would require significant resources to be allocated. As an example, runway lengths or distance from clouds are in many cases still expressed in metres in Europe and EUROCONTROL would like to draw the attention on the fact that a quick removal of 'metres', 'kilometres', 'metres per second' or 'km/h' without careful assessment might have unintended consequences.

comment	32	comment by: CAA-NL
	We support this NPA, and only have one detailed comment which will be entered at the item.	
response	Accepted	

comment	112	comment by: Malta Air Traffic Controllers' Association
	EASA is accepting comments on an AMC and GM of an IR that is not yet finalised.	
response	Accepted	
	The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.	

comment	154	comment by: LfV Sweden
	First of all, it is kind of odd to request comments to AMC/GM to a regulation that is not yet implemented. The mix between rules for ATS procedures and rules/guidelines for aircraft gives a little messy expression to the user. Consequence: Uncertainty about when a statement is a rule or a guide.	
response	First part: Accepted	
	The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.	
	Second part: The IR contains binding material whereas AMC/GM presents the acceptable means of compliance (AMC) and guidance material (GM) to said binding material.	

comment	156	comment by: CANSO
	The current approach clearly poses the risk of disregarding existing safety-related know-how.  SERA.7002 is only one example of multiple mismatches with no direct relation between the Ir	





and AMC and GM:

- IR is about identified controlled flights – origin Doc 4444 8.8.2.1.
- AMC1 is about identified controlled flights -origin Doc 4444 8.8.2.2.
- GM2 is about identified IFR flights – origin Doc 4444 8.8.2.3.
- GM4 and GM5 introduce new text and the term “traffic advice” which does not exist and risks to be mixed up with “air traffic advisory service”.
- GM3 transposes only parts of Doc 4444 8.11.1.

We still believe that there must be a better legal solution to achieve harmonized application of ICAO provisions in the EU with a chance to have local, regional and EU-wide differences, where necessary and for general safety benefits.

We would therefore promote a new evaluation of the transposition principles – and, consequently, of the maintenance mechanism – before taking further regulatory steps, namely in the ATM/ANS domain.

As long as this is not the case we have the following comments to the draft AMC/GM.

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’ to read:

**GM3 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

The provision of collision hazard information does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.

**GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

Collision hazard information should be provided where practicable. This should be done taking account of the priorities related to various tasks, such as provision of separation in accordance with the airspace classification, as well as equipment and workload limitations.

GM4 is also reflecting the content of adopted GM1 SERA.9005(b)(2) on the basis of requests expressed during comitology (SERA A and B).

comment

157

comment by: *CANSO*

While the major content of the AMC/GM material is acceptable in principle, the review of that NPA was a challenge:

Please take note that the following factors

- draft IR amending IR 923/2012 not yet published
- readability of IR 923/2012 difficult, spread over two documents

do not contribute to an “Easy access 2 SERA”.

response

First part:

Accepted



The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.

Second part:

Accepted

An easy-access version will be developed when the whole rule is complete.

comment

159

comment by: *CANSO*

The transposition of PANS and SUPPS into AMC/GM is agreed in principle, as it is consistent with the ICAO ruling structure. Nevertheless, the document inevitably carries issues stemming from the adopted transposition principles, i.e. fragmented adoption, wide presence of procedures related to service provisions, rather than to rules of the air, etc. In the end, the document moves one step further towards complexity, burdensome compliance and arduous maintenance, with no evident safety benefit.

The SERA IR and AMC/GM are building another layer between the ICAO provisions and an ATCO's operations manual. However, neither an overview nor traceability, which requirements have been transposed into which EU-rule - and which not - are available. Each amendment to a regulatory measure (both EU IR and EASA AMC/GM) is a deep cut into its readability.

It would be helpful to receive "transposition matrixes" which allow to trace between ICAO provisions (Annex and Docs) and their place in EU-law (both hard and soft law) on requirement level (including all shall, should, notes and examples).

Currently there is no full visibility of

- what has been transposed already
- whereto
- what is left over to ICAO alone
- what has been changed and why
- what is drafted on top of ICAO.

(Not alone with SERA, but also "new Common Requirements AROR", "ATCO" etc.).

This is heavy administrative burden to be performed at each provider and State, which not only impedes a fluent review and comparison of the rules and measures at rule drafting stage but also extremely hinders in finding the border line between points that need engagement with ICAO only and other points that need to be dealt with at European level once rules are in place.

From explanations to latest SSC#60 we understood that such compliance checklists will be provided soon. Thank you!

response

Accepted

A list will be developed when the whole rule is complete.

comment

160

comment by: *CANSO*

CANSO fully understands that there are some legal difficulties to adopt the PANS ATM and EUR SUPPS in their entirety and with agreed exemptions because of the principle that each AMC/GM shall be referred to a specific IR.



We hope that you will agree that the adoption of 38 pages of phraseologies as AMC to one single general SERA provision (=AMC1 SERA.14001) appears to be inconsistent with the above principle. However, we fully understand and support the rationale behind such a decision in view of the effort required.

response Noted

comment 161 comment by: CANSO

CANSO really welcomes the “Easy access 2 ATCO” file and would like to encourage EASA to produce such a practicable publication as well for SERA.  
Some thoughts should be spent about an appropriate maintenance mechanism as well.

response Accepted

An easy-access version will be developed when the whole rule is complete.

comment 208 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
<p>The possibility that many of the AMC/GM are considered not only as such, but, because of their importance, part of the regulation itself should be taken into consideration.</p> <p>In particular (but not limited to), the AMCs/GM of <b>Section 11 "Interference, Emergency, Contingencies and Interception"</b> are relevant both for land and air elements; and it is important that the procedures thereof become the rules to be known/followed both by pilots and ATS personnel, if any.</p> <p>It is not fully understood that the procedures there established, which are of utmost importance, are considered simply as AMC or GM, and therefore their application in the 28 States of the Union may differ, even though SERA pursues harmonization among them.</p>	-

response Noted

The source material was PANS, SUPPs, or Attachments to ICAO Annex 2. None of them has the status of SARPs and therefore a higher level of legal strength would require wider discussion and consensus to be achieved, and most likely well beyond the ATM technical level.

comment 209 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
<p>Although the consultation period for the <b>NPA 2015-14</b> has been extended, in this regard it is essential that a text of SERA Part C, as much consolidated as possible, is available.</p>	-



For the moment this is not the case, given that it is being treated by the European Commission (legal services) and undergoing the committee process.  
Therefore, in the light of a final text of the SERA Part C regulation, another different time period to address the **NPA 2015-14** (or to produce another NPA associated with SERA Part C Regulation) might be necessary.

response

Accepted

The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.

comment

278

comment by: ENAV

The current approach clearly poses the risk of disregarding existing safety-related know-how.

SERA.7002 is only one example of multiple mismatches with no direct relation between the IR and AMC and GM:

- IR is about identified controlled flights – origin Doc 4444 8.8.2.1.
- AMC1 is about identified controlled flights -origin Doc 4444 8.8.2.2.
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We still believe that there must be a better legal solution to achieve harmonized application of ICAO provisions in the EU with a chance to have local, regional and EU-wide differences, where necessary and for general safety benefits.

We would therefore promote a new evaluation of the transposition principles – and, consequently, of the maintenance mechanism – before taking further regulatory steps, namely in the ATM/ANS domain.

As long as this is not the case we have the following comments to the draft AMC/GM.

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’ to read:

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Collision hazard information should be provided where practicable. This should be done



taking account of the priorities related to various tasks, such as provision of separation in accordance with the airspace classification, as well as equipment and workload limitations.

GM4 is also reflecting the content of adopted GM1 SERA.9005(b)(2) on the basis of requests expressed during comitology (SERA A and B).

comment

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comment by: ENAV

While the major content of the AMC/GM material is acceptable in principle, the review of that NPA was a challenge:

Please take note that the following factors

- draft IR amending IR 923/2012 not yet published
- readability of IR 923/2012 difficult, spread over two documents

do not contribute to an “Easy access 2 SERA”.

response

Accepted

The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.

Second part:

Accepted

An easy-access version will be developed when the whole rule is complete.

comment

281

comment by: ENAV

The transposition of PANS and SUPPS into AMC/GM is agreed in principle, as it is consistent with the ICAO ruling structure. Nevertheless, the document inevitably carries issues stemming from the adopted transposition principles, i.e. fragmented adoption, wide presence of procedures related to service provisions, rather than to rules of the air, etc. In the end, the document moves one step further towards complexity, burdensome compliance and arduous maintenance, with no evident safety benefit.

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It would be helpful to receive “transposition matrixes” which allow tracing between ICAO provisions (Annex and Docs) and their place in EU-law (both hard and soft law) on requirement level (including all shall, should, notes and examples).

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(Not alone with SERA, but also “new Common Requirements AROR”, “ATCO” etc.).

This is heavy administrative burden to be performed at each provider and State, which not only impedes a fluent review and comparison of the rules and measures at rule drafting



	<p>stage but also extremely hinders in finding the border line between points that need engagement with ICAO only and other points that need to be dealt with at European level once rules are in place.</p> <p>From explanations to latest SSC#60 we understood that such compliance checklists will be provided soon. Thank you!</p>
response	<p>Accepted</p> <p>A list will be developed when the whole rule is complete.</p>
comment	<p>282 <span style="float: right;">comment by: ENAV</span></p> <p>ENAV fully understands that there are some legal difficulties to adopt the PANS ATM and EUR SUPPS in their integrity and with agreed exemptions because of the principle that each AMC/GM shall be referred to a specific IR.</p> <p>We hope that you will agree that the adoption of 38 pages of phraseologies as AMC to one single general SERA provision (=AMC1 SERA.14001) appears to be inconsistent with the above principle. However, we fully understand and support the rationale behind such a decision in view of the effort required.</p>
response	<p>Noted</p>
comment	<p>283 <span style="float: right;">comment by: ENAV</span></p> <p>ENAV really welcomes the “Easy access 2 ATCO” file and would like to encourage EASA to produce such a practicable publication as well for SERA.</p> <p>Some thoughts should be spent about an appropriate maintenance mechanism as well.</p>
response	<p>Accepted</p> <p>An easy-access version will be developed when the whole rule is complete.</p>
comment	<p>284 <span style="float: right;">comment by: ENAV</span></p> <p>SERA C implementation was partly planned for May 26, 2016 and most of 2017. We assume that this will be prolonged by a year because of the delay. Is this correct? In the various articles there are incorrect ICAO references. This complicated the review.</p>
response	<p>Noted</p> <p>The application date is 12 October 2017, with the exception of the following provisions which shall apply from 18 August 2016:</p> <p>(1) Article 1(1);</p> <p>(2) Article 1(2)(e), (h), (i), (k) and (n);</p> <p>(3) Article 1(3);</p> <p>(4) Article 2;</p> <p>points (1), (2), (3), (4), (5), (6), (8) (12), (13), (15), (16), (19), (21), (22), (26)(b), (26)(c),</p>



(27), and (28) of the Annex.

comment

343

comment by: *CANSO***GM1 SERA.11010**

Not part of this NPA however as part of amendments to 923/2012 (SSC 60 refers) for implementation on 18 August 2016, SERA.11010 'In-flight contingencies' is to be amended to SERA.11010 'Strayed or unidentified aircraft'. Existing GM1 SERA.11010 'In-flight contingencies' will therefore need amending.

Not clear what the procedure is for amending existing GM1 SERA.11010. Is there a plan to amend ED 2013/013/R or to retain and have amending Decision. Possible fragmentation of ATM rules in different documents?

response

Accepted

The ED Decision on AMC/GM to SERA will amend also the existing AMC/GM where changes are necessary. A consolidated version of the rule will be developed.

comment

345

comment by: *Naviair*

As an ANSP Naviair has a general concern about making ICAO rules into EU regulation. The experiences from the implementation of SERA A and B have shown that it is more than usually difficult to translate procedures to clear EU regulation. Moreover, it can be a delaying issue if ICAO rules are changed and SERA has to be changed before they can apply for European airspace users, while they take effect everywhere else, when decided by ICAO.

response

Noted

Amendments are dealt with by an ongoing rulemaking task. It has to be noted that continuous updating is not feasible and it would rather be done in intervals.

comment

375

comment by: *HungaroControl*

HungaroControl fully supports the comments submitted by CANSO.

response

Noted

comment

380

comment by: *HungaroControl*

We want to draw EASA's attention that the belated SSC voting and amendments of the draft IR made really difficult to comment on the AMC/GM, however we are aware that it is out of the powers of EASA to affect the working procedure of SSC. Moreover there was not any consolidated draft version of SERA IR available.

We suggest not to start the consultation period without voted IR or extend the consultation period when the voting procedure is foreseen to be postponed (not on the last day of the consultation period).

response

Accepted



A consolidated version will be developed when the rule is complete.

The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.

comment 382

comment by: ENAV

**GM1 SERA.11010**

Not part of this NPA however as part of amendments to 923/2012 (SSC 60 refers) for implementation on 18 August 2016, SERA.11010 'In-flight contingencies' is to be amended to SERA.11010 'Strayed or unidentified aircraft'. Existing GM1 SERA.11010 'In-flight contingencies' will therefore need amending.

Not clear what the procedure is for amending existing GM1 SERA.11010. Is there a plan to amend ED 2013/013/R or to retain and have amending Decision. Possible fragmentation of ATM rules in different documents?

response Noted

The ED Decision on AMC/GM to SERA will amend also the existing AMC/GM where changes are necessary.

comment 385

comment by: UK CAA

**General Comment:**

AMC/GM supporting SERA A/B (made under ED Decision 2013/013/R dated 17 July 2013) may have been modified by the final text of the proposed SERA Part C regulation as presented at Single Sky Committee meeting 60 (24 Feb 16). Such changes may not have been foreseen by NPA 2015-14. Similarly, it is possible that several proposed AMC/GM supporting SERA C have been affected by changes made to the SERA Part C text during comitology. In both cases the changes will not have been captured by NPA 2015-14.

EASA is asked to clarify how such changes will be addressed by the agency, and whether any such changes will be subject to additional consultation with Member States, Competent Authorities and industry.

In addition, given the proximity of SERA Part C Phase 1 effective date, EASA clarification regarding adoption and publication of the supporting AMC/GM is requested in order to facilitate Part C implementation, in particular the timely notification to industry of regulatory changes.

**Justification:**

Clarification and facilitation of timely SERA Part C Phase 1 implementation activity.

response Noted

The ED Decision on AMC/GM to SERA will amend also the existing AMC/GM where changes are necessary.





The publication of the AMC/GM is expected in the course of Q4 of 2016.

comment 386

comment by: UK CAA

### General Comment

Reference Reg (EU) 923 of 2012 Article 2(12) ('aerial work' means an aircraft operation in which an aircraft is used for specialised services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc.)

#### Comment:

The definition of 'aerial work' is an aircraft operation in which an aircraft is used for specialized services such as agriculture, construction, photography, surveying, observation and patrol, search and rescue, aerial advertisement, etc;) – this does not appear to align with the use of 'SPO' in the Ops regulation (e.g. SPO.GEN.005).

#### Justification:

The UK CAA seeks clarification and to ensure alignment of terminology applied elsewhere in EU legislation through development of GM explaining link between 'aerial work' and 'Special Operations (SPO) as applied through the Air Ops regulation. Alternatively through further development of IR content.

response Not accepted

The definitions are aligned. SERA establishes the airspace usage requirements whereas Regulation (EU) 965/2012 (the Air OPS Regulation) addresses the operational requirements.

comment 387

comment by: UK CAA

### General Comment

Reference Reg (EU) 923 of 2012 SERA.3125

#### Comment:

It has been noted that there is no standard requirement for balloon position lights at night, with requirements (when specified) varying throughout member states.

Balloons do not regularly fly at night, since it is potentially difficult to see ground obstructions at night (for example electricity power lines) whilst landing. Occasionally, hot-air balloons take-off at night, but plan to land by day. However, gas balloons often take off in the middle of the night (because there is an advantage to departing at the coolest time of the day) when planning endurance flights of potentially several days. Events like the Coupe Aeronautique Gordon Bennett International Gas Balloon Race have seen a number of gas balloons operating from the same event, but displaying several variations of position lights at night, including:

- a steady red light of at least 5 candela; or
- a steady white light of at least 5 candela; or
- a flashing white strobe light.

#### Justification:

To ensure that all balloons registered in member states and operating in the territory of



response	<p>member states adopt a common lighting requirement for balloon position lights when operating at night. Common requirements will assist all airspace users at night. The UK CAA suggests that EASA introduces a standard requirement for balloon position lights at night. This could, as an interim arrangement, be achieved through AMC stipulating the following options:</p> <ul style="list-style-type: none"> <li>· a steady red light of at least 5 candela; or</li> <li>· a steady white light of at least 5 candela; or</li> <li>· a flashing white strobe light.</li> </ul> <p>Not accepted</p> <p>The proposal included in the comment would encompass also other regulations and requirements and it could not be considered only as an airspace usage requirement.</p>
comment	<p>388 <span style="float: right;">comment by: UK CAA</span></p> <p><b>General Comment</b></p> <p>Reference Reg (EU) XXX of 2016 (SERA Part C) SERA.11010 ‘In-flight contingencies’</p> <p><b>Comment:</b> SERA Part C proposes amendment of SERA.11010 ‘In-flight contingencies’ to SERA.11010 ‘Strayed or unidentified aircraft’. The UK CAA suggests that existing GM1 SERA.11010 ‘In-flight contingencies’ will therefore need amending.</p> <p><b>Justification:</b> Consistency of text and need to update existing GM.</p> <p><b>Proposed Text:</b> “Rename extant GM1 SERA.11010 ‘In-flight contingencies’ to read GM1 SERA.11010 ‘Strayed or unidentified aircraft’.”</p>
response	<p>Noted</p> <p>The ED Decision on AMC/GM to SERA will amend also the existing AMC/GM where changes are necessary.</p>
comment	<p>449 <span style="float: right;">comment by: DTCA</span></p> <p>General comments from Danish Transport and Construction Agency:</p> <p>Besides the specific comments we have placed to amongst others the tabled Issue 1 and 2 (para 2.4.2), we would like to remind EASA of the Danish comments, DTCA letter of 29 January 2016 to the Commission concerning comments to SERA Part C, ahead of SSC/60 in Feb. 2016 - reflected in the CRD, based on State's comments ahead of SSC/60 (SERA Ref. Art. 2 (71)):</p> <p><i>Comments to the draft Regulation:</i> <i>R1. Reference to Article 2, Definitions – (h) the definition No. 71 "estimated time of arrival": The definition is in line with the ICAO definition in PANS-ATM. The European community has</i></p>



however introduced provisions for 'En-route Instrument Rated' pilots (EIR), who are flying IFR, but neither qualified nor privileged to fly instrument approach procedures. Hence the definition would not apply to EIR-operations.

Suggest that it be considered to keep the definition as is in order to avoid differences to the ICAO definition, and to clarify the above perceived discrepancy in the SERA AMC/GUI, which is still open for comments.

The response to the comment made:

"Unfortunately the precise handling of EIR flights seems to be still somewhat unclear in many cases, so the DK proposal to clarify this aspect in future GM is probably the best way forward."

response Not accepted

comment 453

comment by: DTCA

This is a general comment to EASA concerning the rulemaking in the area of ATM/ANS. The comments made are not specifically related to the NPA at hand, but they are certainly related to the SERA-regulation, recently being supplemented with SERA Part C, and the upcoming Part ATS - which would, generally speaking, collectively transform ICAO PANS-ATM (Doc 4444) into EU-legislation.

Danish Transport and Construction Agency is of the opinion that EASA, by the time the NPA on Part ATS is being launched, should provide a list that clearly informs which provisions in the PANS-ATM (Doc 4444) that are being/intended to be transformed into EU-legislation, and which that are not intended to be transformed into EU-legislation.

This exercise is intended to assist EU Member states to obtain an overview in an area of highly safety critical rulemaking, as the provisions in ICAO PANS-ATM (Doc 4444) are the fundamental rules for air traffic services worldwide.

The above mentioned issue was raised by a number of States during the final comments to SERA Part C before the SERA Part C received a positive vote during SSC/60.

response Accepted

A list will be developed when the whole rule is complete.

comment 454

comment by: European Cockpit Association

It is unacceptable for the user community to research through series of documents as shown in annotations to produce a reference basis that includes draft amendments and reference draft AMC/GM.

Proper and useful commenting should be supported by provision of a single, consolidated reference document.

response Accepted

A consolidated version will be developed when the whole rule is complete.



comment	<p data-bbox="359 235 406 280">493</p> <p data-bbox="1228 235 1484 280" style="text-align: right;">comment by: <i>FNAM</i></p> <p data-bbox="359 291 1484 369">FNAM (Fédération Nationale de l'Aviation Marchande) is the French Aviation Industry Federation / Trade Association for Air Transport, gathering the following members:</p> <ul data-bbox="406 436 1324 660" style="list-style-type: none"> <li>• CSTA: French Airlines Professional Union (incl. Air France)</li> <li>• SNEH: French Helicopters Operators Professional Union</li> <li>• CSAE: French Handling Operators Professional Union</li> <li>• GIPAG: French General Aviation Operators Professional Union</li> <li>• GPMA: French Ground Operations Operators Professional Union</li> <li>• EBAA France: French Business Airlines Professional Union</li> </ul> <p data-bbox="359 683 821 728">And the following associated member:</p> <p data-bbox="359 750 845 795">UAF: French Airports Professional Union</p> <p data-bbox="359 828 526 873"><b><u>Introduction:</u></b></p> <p data-bbox="359 896 1484 1019">The comments hereafter shall be considered as an identification of some of the major issues the French industry asks EASA to discuss with third-parties before any publication of the proposed regulation. In consequence, the following comments shall not be considered:</p> <ul data-bbox="359 1008 1484 1332" style="list-style-type: none"> <li>- As a recognition of the third-parties consultation process carried out by the European Parliament and of the Council;</li> <li>- As an acceptance or an acknowledgement of the proposed regulation, as a whole or of any part of it;</li> <li>- As exhaustive: the fact that some articles (or any part of them) are not commented does not mean FNAM has (or may have) no comments about them, neither FNAM accepts or acknowledges them. All the following comments are thus limited to our understanding of the effectively published proposed regulation, notwithstanding their consistency with any other pieces of regulation.</li> </ul> <p data-bbox="359 1366 614 1411"><b><u>General comments :</u></b></p> <p data-bbox="359 1433 1484 1624">The FNAM thanks EASA for the proposition of Acceptable Means of Compliance and Guidance Material regarding the Standardised European Rules of Air (SERA Part C). However, the FNAM wonders why there are differences regarding the instrument approach operation minima for the several categories between the SERA Part C regulation and the Air Ops regulation (EU n° 965/2012).</p>
response	<p data-bbox="359 1635 526 1680">Not accepted</p> <p data-bbox="359 1691 1204 1736">SERA defines the type of IA operations, not the values for the minima.</p>
comment	<p data-bbox="359 1803 406 1848">494</p> <p data-bbox="981 1803 1484 1848" style="text-align: right;">comment by: <i>Swedish Transport Agency</i></p> <p data-bbox="359 1859 1484 2018">EASA has, in general, done a good job with this NPA. We note that the EASA has caught up with the new rule changes by the ICAO. It is positive that EASA have mentioned the source of the proposed AMC/ GM in direct connection with the rule on which the proposal is based. It is also very positive that the Swedish views expressed in "TAG" has been taken into account,</p>



response	more specifically, the problems that can occur at night flying VFR on top. Noted
comment	501 <span style="float: right;">comment by: <i>ENAC Italy</i></span> The proposed document does not follow the different applicability dates of the regulatory text subject to the positive opinion of Single Sky Committee.  The outcome is that in some cases the text refers to articles which will come into force starting from 2017.
response	Noted The publication will coincide with the publication of the IR.
comment	517 <span style="float: right;">comment by: <i>The Finnish Aeronautical Association</i></span> The Finnish Aeronautical Association welcomes the opportunity to comment on this NPA 2015-14 SERA Part C AMC/GM.  Our comment concerns the fact that the proposed AMC/GM text amounts to some 65 pages of information. This is far above any reasonable amount that a non-professional pilot can be expected to memorize for his/her flights in addition to other required knowledge. It is also inconsistent with the EASA principle of proportional regulation and the simplification aims of the EASA GA Strategy.  For example the acronyms ACAS, RVSM, CPDLC and RNAV refer to procedures that only the tiniest fraction of sports pilots will ever have to worry about, yet they occupy a large number of pages in the proposed AMC/GM.  Therefore we propose that the SERA Part C with its AMC/GM will be published in a two-step package, with one subset containing only the information required for VFR operations* and an extension package containing the additional information required for IFR operations and procedures such as those mentioned above. This would cut down on the necessary training and focus sports pilots' learning capacity on items relevant to their flying operations and thus improve safety.  *) The use of VFR/IFR as the division line is a suggestion only, others are also acceptable.
response	Not accepted The rule applies to all airspace users. The terms used are widely accepted and used.

comment	43 <span style="float: right;">comment by: <i>NATS National Air Traffic Services Limited</i></span> General Comment
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	<p>Not part of this NPA however as part of amendments to 923/2012 (SSC 57 refers) for implementation on 26 May 2016, SERA.11010 'In-flight contingencies' is to be amended to SERA.11010 'Strayed or unidentified aircraft'. Existing GM1 SERA.11010 'In-flight contingencies' will therefore need amending.</p> <p>Not clear what the procedure is for amending existing GM1 SERA.11010. Is there a plan to amend ED 2013/013/R?</p>
response	<p>Noted</p> <p>The ED Decision on AMC/GM to SERA will amend also the existing AMC/GM where changes are necessary.</p>
comment	<p>346 <span style="float: right;">comment by: René Meier, Europe Air Sports</span></p> <p>Europe Air Sports thanks the Agency for preparing NPA 2015-14 on AMC/GM to SERA Part-C. Our member organisations as well as our individual members are subject to these provisions in different ways. We therefore propose a variety of comments, some clearly outside the scope of air sports, but of general interest.</p> <p>As you might imagine the "language to be used" provisions are of great concern, but this for sure is not surprising when we look at the map of Europe, where there are small countries counting up to 4 official languages, large countries with one official language only, and variations in-between. These facts make it difficult to propose solutions acceptable to our members, understandably wishing to use their mother-tongue in their home-country, expecting English being available all over Europe as aviation standard to those crossing national borders which in many cases also are language borders.</p>
response	<p>Noted</p>
comment	<p>347 <span style="float: right;">comment by: René Meier, Europe Air Sports</span></p> <p>General comment</p> <p>To make reading and understanding easier please make use of the most-commonly used full-text name of an object or an organisation throughout the document and indicate whenever possible an acronym or an abbreviation, write e.g. "Ground-based Augmentation System" (GBAS) in place of "ground-based aid".</p>
response	<p>Not accepted</p> <p>EASA, being an Agency of the European Union, is bound to follow the drafting principles set up by the <a href="#">Interinstitutional style guide of the Publications Office</a>. In accordance with said style guide, the full term is written out followed by the abbreviation in brackets on its first mention in a document. As of then, only the abbreviation is used.</p>



comment	<p data-bbox="359 235 391 280">95</p> <p data-bbox="1157 235 1484 280" style="text-align: right;">comment by: <i>NSA Austria</i></p> <p data-bbox="359 291 1484 649">Within the Revised rulemaking program 2014-17 an ED 2013/29/R was released within which there are numerous timeframes listed, that are obviously outdated. Currently there are comments requested to a NPA (AMC and GM to SERA Part C) while the Part C of SERA is not yet adopted for various reasons. It might very well be, that SERA Part C will be incorporated in the current SERA (923/2012) IN PARTS only, which would bring the regulators and the ANSPs into a position that a “complete” AMC/GM exists for an “incomplete” SERA. There is no reason to believe that such a way forward might in any way ASSIST memberstates in fulfilling their obligations under the Chicago convention, as it is mentioned every time when there is another part of SERA published.</p> <p data-bbox="359 683 1484 795">SERA – in the current and valid status- contents 45 flexibility provisions that can be "permitted", "exempted", "prescribed", "authorised" or "specified" by the states or competent authorities.</p> <p data-bbox="359 795 1484 940">This means, that there could be 45 times 27 (# of member states) variations of SERA IN FORCE throughout europe already, therefore missing the achievement of an “uniform implementation” as it is laid out in Article 2.2 (d) of the basic regulation 216/2008.</p> <p data-bbox="359 974 1484 1086">Furthermore to these possible variations SERA Part C and especially the AMC/GM material open a wide variety of implementation of provisions instead of a harmonised implementation especially in the scope of the – VERY safety critical- provisions of Annex 10.</p> <p data-bbox="359 1108 1484 1220">Therefore we strongly recommend to ascertain the current provisions of SERA including all the different publications throughout Europe and to strive for sensefull harmonisation of the provisions of ICAO within European airspace as required by the basic regulation.</p>
response	<p data-bbox="359 1243 558 1288">First part: Noted</p> <p data-bbox="359 1299 981 1344">The consistency will be checked before publication.</p> <p data-bbox="359 1355 710 1400">Second and third part: Noted</p> <p data-bbox="359 1411 1484 1534">The built-in flexibility has been asked by the Member States. It will also reduce the need for differences. The issue was discussed at the SSC 60. The successful implementation will be assessed based on the results of the standardisation inspections.</p>

## 2. Explanatory Note — 2.4. Overview of the proposed amendments

p. 5-6

comment	<p data-bbox="359 1713 391 1758">10</p> <p data-bbox="1157 1713 1484 1758" style="text-align: right;">comment by: <i>CAA-Norway</i></p> <p data-bbox="359 1769 1484 1848">CAA-Norway agree with the proposal to include Annex 2 Attachment B to the AMC/GM document. The same goes for Issue 2.</p>
response	<p data-bbox="359 1870 446 1915">Noted.</p>
comment	<p data-bbox="359 1960 391 2004">15</p> <p data-bbox="558 1960 1484 2004" style="text-align: right;">comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i></p>



response	We support EASA proposal to include unlawful interference AMC/GM in SERA. Noted.
comment	16 comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i> We support the inclusion of Night VFR on top GM in SERA Part C.
response	noted.
comment	96 comment by: <i>NSA Austria</i> 2.4.1 : Annex 10 was set up for very good reasons and every State could adapt the provisions according their experience. Any changes had to be published in DOC7030 and the relevant AIPs. To implement the provisions of Annex 10 PARTLY as a rule and partly as AMC does NOT meet the intention of a mostly and mainly harmonised RTF procedure throughout the world AND Europe. What is a state supposed to do, if the provisions of ANNEX10 had been revised due to occurrences and been published, once an AMC is published with different RTF provisions. The task – for every European state- cannot be, to assess if the reversion back to provisions - that had been unsuccessfully in force before- might again be sufficiently safe or can be mitigated somehow.
response	Noted It should be noted that provisions from Annex 10 were essentially transposed in SERA Part C IR and that the elements transposed in AMC/GM are either originating from Notes of Annex 10 (notes having the status of guidance) or from provisions which are closer to AMC/GM by their nature or their content (e.g. with terms like ‘to the extent possible’). According to the transposition principles, not all the provisions of Annex 10 were considered being of rules-of-the-air nature. Since AMC are non-binding, it is possible to choose alternative means to comply with the rule. In this case, however, they lose the presumption of compliance provided by the EASA AMC, and need to demonstrate to competent authorities that they do comply with the law.
comment	155 comment by: <i>LFV Sweden</i> It is unclear how and how quickly AMC/GM will be updated (i.e. how the maintenance mechanism will work) regarding to amendments of ICAO docs or other reference documents. This comment also apply to SERA Part A, B and C.
response	Noted Amendments are dealt with by an ongoing rulemaking task. It has to be noted that continuous updating is not feasible and it would rather be done in intervals.
comment	210 comment by: <i>AESA / DSANA</i>





PART	COMMENT	JUSTIFICATION
<p><b>2. Explanatory Note</b> 2.4. Overview of the proposed amendments 2.4.1 General</p>	<p>The last paragraph states "<i>The source of the draft AMC/GM is indicated together with the text. Where such reference does not exist, the text has been developed by the RMT.0148 (ATM.001) Rulemaking Group.</i>"</p> <p>For the sake of more clarity, in those AMCs/GM <b>in the different Sections along the whole document</b> with no reference, the precise reference which is used as a source for such AMCs/GM (corresponding section of the PANS-ATM, Doc. 7030, "RMT.0148 (ATM.001) Rulemaking Group", etc.) <b>should be added.</b></p>	<p>Although <b>Chapter 2</b> "<i>Explanatory Note</i>" explains which is the source in case of no reference, for the sake of more clarity, every AMC/GM in the different Sections should have its reference, and PANS-ATM, Doc. 7030, "RMT.0148 (ATM.001) Rulemaking Group", etc. should be used for those cases.</p>

response

Noted

It has been decided that noting the matter in the explanatory note provides sufficient clarity.

comment

366

comment by: CAA-NL

**2.4.2 Open issues**

During the course of the development of this proposal, some issues were identified by EASA as 'open' and they would need to be considered during the NPA consultation. The Netherlands view with regard these two issues are:

Issue 1, Inclusion of Attachment B to Annex 2

The requirements as detailed in ICAO Annex 2 Attachment B are related to the pilot in command of the aircraft. The information about the courses the pilot in command may take in cases of unlawful interference are interesting to know for controllers. In actual cases ATC may no longer be in a position to control the aircraft and needs to take action as soon as unlawful interference is known or suspected. Since AMC 2 gives direction to the pilot-in-command with consequences for other traffic and ATC, this seems to be material that can be introduced into SERA. However our preference on this option is weak, since this material is primarily focussing on the pilot and so could be introduced into OPS rules as well.

Issue 2, GM1 to SERA.5005(c)(3)(iii) Night VFR on top

This material gives direction to the pilot-in-command and would stroke better with rules related to aircraft operation

response

Noted

comment

447

comment by: DTCA



**Para 2.4.2 Open Issues - Issue 1, Inclusion of Attachment B to Annex 2:**

References:

ICAO Annex 2:

3.7.2 If an aircraft is subjected to unlawful interference, the pilot-in-command shall attempt to land as soon as practicable at the nearest suitable aerodrome or at a dedicated aerodrome assigned by the appropriate authority unless considerations aboard the aircraft dictate otherwise.

ICAO Annex 2, Attachment B:**1. General**

The following procedures are intended as guidance for use by aircraft when unlawful interference occurs and the aircraft is unable to notify an ATS unit of this fact.

**2. Procedures**

2.1 If the pilot-in-command cannot proceed to an aerodrome in accordance with the rules in Chapter 3, 3.7.2, he/she should attempt to continue flying on the assigned track and at the assigned cruising level at least until able to notify an ATS unit or until within radar or ADS-B coverage.

2.2 When an aircraft subjected to an act of unlawful interference must depart from its assigned track or its assigned cruising level without being able to make radiotelephony contact with ATS, the pilot-in-command should, whenever possible:

c) if no applicable regional procedures have been established, proceed at a level which differs from the cruising levels normally used for IFR flight by:

1) 150 m (500 ft) in an area where a vertical separation minimum of 300 m (1 000 ft) is applied; or

2) 300 m (1 000 ft) in an area where a vertical separation minimum of 600 m (2 000 ft) is applied.

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It's our interpretation that the procedures in Attachment B to Annex 2 are to be applied when the pilot cannot get in contact with ATS, cf. Att. B, para 1: above and where the aircraft is outside radar and/or ADS-B coverage, cf. Att. B, para 2.1 above.

Provided this is an accurate interpretation, there seems to be no need for inclusion into EU-Guidance. On the contrary, it should be left out until flight safety consequences have been considered in full.

Furthermore, it's our view that States have already taken Attachment B into account within their national regulations, and we see therefore no need to make it EU-Guidance. The reason being that it is a very small portion of EU-airspace that is without radar/ADS-B coverage, hence the transponder codes 7700, 7600 and 7500 can be utilized towards ATS. In addition, in particular the procedure in para 2.2.c) above, could create flight safety issues in an RVSM-airspace where ACAS/TCAS is applied.

Concerning para 2.2 c), we recognize that the prescribed procedure could make ATS aware in a surveilled airspace (radar/ADS-B) of a situation where there is a threat to those on board the aircraft, however according to para 2.1, the procedure is not meant for such a



surveiled airspace. A change in altitude, as suggested, could create flight safety problems for the involved aircraft as well as other aircraft in the vicinity. The problem, so to speak, is moved from "the inside" to "the outside". In an RVSM-environment an unexpected change in altitude can create a chain-reaction, generated by ACAS/TCAS, where the planned traffic by ATC would be affected, resulting in potential separation minima infringements and thereby a reduction in flight safety.

In summary, and with reference to the above comments, the Danish Transport and Construction Agency finds that the inclusion of Attachment B into EU-Guidance shall await a thorough flight safety assessment and consequential analysis - unless an ICAO *Impact Assessment* is already available.

response Noted

comment 448

comment by: DTCA

**Para 2.4.2 Open Issues - Issue 2, GM1 to SERA.5005(c)(3)(iii) Night VFR on top:**

Reference is made to the Danish Civil Regulation (BL 5-61, para 5.5, VFR-flying without the surface in sight) - still applied, cf. art. 8 to the SERA-regulation.

A general comment to GM1:

GM1 is in harmony with the principles laid down with regard to planning a flight, cf. the Danish Civil Regulation (BL) 5-61, para 5.5. The Danish regulation is however more specific and furthermore lays down a requirement to be able to change from VFR to IFR if the criteria in para 5.5 cannot be met. It must be noted though that BL 5-61 is accepting VFR-flights without the surface in sight during daytime only, cf. para 6.7. The suggested GM1 is far too vaguely formulated ("likelihood of...", "possibility of...") and should therefore in general be tightened, as a minimum as an AMC, and should be more in line with the Danish BL 5-61. As no consequential- or risk analysis, neither a RIA, exists, it is not clear if the suggested text has undergone a flight safety assessment. Furthermore the consistency with requirements and recommendations in the FCL- and OPS-regulations and the attached AMC, e.g. FCL AMC on Night Rating, has not been analyzed nor described.

The suggested text in GM1 is a fundamental change seen in relation to former and existing



Danish regulations, resulting in a change in flight safety level in Danish airspace, should the textproposal in GM1 be maintained.

In summary, Danish Transport and Construction Agency asks that

- an AMC is developed, not only GM;
- more specific requirements regarding the planning minima is included in the AMC, e.g. that TAFs and forecasts shall indicate that there is no more than 4 octas (4/8) of clouds for each cloud layer during the phases of the flight (departure, en-route and landing) and that viibility is at least equal to the requirement in the airspace classes in which the flight is performed;
- consistency is ensured with FCL- and OPS-regulations and the AMCs.

response Noted

comment 455 comment by: *European Cockpit Association*

**Issue 1: Inclusion of Attachment B to Annex 2**  
In accordance with the Agency's decision explained in 2.4.1, these provisions are shown as proposed AMC2 SERA.11005 Unlawful interference. The transposition is supported, as the root is the universal applicable ICAO Annex 2, even if only an Attachment.

**Issue 2: GM1 to SERA.5005(c)(3)(iii) Night VFR on top**  
No position as not applicable to commercial air transport type operations

response Noted

**3. Proposed amendments** p. 7

comment 213 comment by: *AESA / DSANA*

COMMENT	JUSTIFICATION
The source references should be included for all the items in this section.	Although many items include the source reference, there are no source references identified for all the item.

response Noted  
See Chapter 2 'Explanatory Note' of the NPA.

comment 320 comment by: *DFS Deutsche Flugsicherung GmbH*

The SERA approach poses the risk of disregarding decades of know-how and internalised practice and the related teaching material of safety-related work.

SERA.7002 is only one example of multiple mismatches with no direct relation between the



IR and AMC and GM:

- IR is about identified controlled flights – origin Doc 4444 8.8.2.1.
- AMC1 is about identified controlled flights -origin Doc 4444 8.8.2.2.
- GM2 is about identified IFR flights – origin Doc 4444 8.8.2.3.
- GM4 and GM5 introduce new text and the term “traffic advice” which does not exist and risks to be mixed up with “air traffic advisory service”.
- GM3 transposes only parts of Doc 4444 8.11.1.

We still believe that there must be an alternative legal solution to achieve harmonized application of ICAO provisions in the EU with a chance to have local, regional and EU-wide flexibility, where necessary and for safety benefits.

While in ICAO the term "should" is intended to indicate the flexibility in determination of the extent of an action, the meaning of "should" in AMC is not for choice and flexibility but comprehensive in order to fulfill the IR. The current process for alternative AMC does not reflect the purpose and need for the required flexibility.

As long as no other principle is applied, we have the following comments to the draft AMC/GM.

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’ to read:

**GM3 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

The provision of collision hazard information does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.

**GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

Collision hazard information should be provided where practicable. This should be done taking account of the priorities related to various tasks, such as provision of separation in accordance with the airspace classification, as well as equipment and workload limitations.

GM4 is also reflecting the content of adopted GM1 SERA.9005(b)(2) on the basis of requests expressed during comitology (SERA A and B).

comment

321

comment by: *DFS Deutsche Flugsicherung GmbH*

While the major content of the AMC/GM material is acceptable in principle, the review of that NPA was a challenge:

Please take note that the following factors

- draft IR amending IR 923/2012 not yet published
- readability of IR 923/2012 difficult, spread over two documents

do not contribute to an “Easy access 2 SERA”.

The SERA IR and AMC/GM are building another layer between the ICAO provisions and an ATCO’s operations manual. However, neither an overview nor traceability, which requirements have been transposed into which EU-rule - and which not - are available. Each amendment to a regulatory measure (both EU IR and EASA AMC/GM) is a deep cut into its readability.

This is a poor condition.



It would be helpful to receive “transposition matrixes” which allow to trace between ICAO provisions (Annex and Docs) and their place in EU-law (both hard and soft law) on requirement level (including all shall, should, notes and examples).

Currently there is no full visibility of

- what has been transposed already
- whereto
- what is left over to ICAO alone
- what has been changed and why
- what is drafted on top of ICAO.

(Not alone with SERA, but also “new Common Requirements AROR”, “ATCO” etc., where ICAO content is been transposed).

This is heavy administrative burden to be performed at each provider and State, which not only impedes a fluent review and comparison of the rules and measures at rule drafting stage but also extremely hinders in finding the border line between points that need engagement with ICAO only and other points that need to be dealt with at European level once rules are in place.

*From latest SSC#60 flimsy we understand that such compliance checklists will follow soon. Thank you*

response

Accepted

The consultation period for this NPA was extended twice to allow enough time after the adoption of the IR.

A list will be developed when the whole rule is complete.

comment

322

comment by: *DFS Deutsche Flugsicherung GmbH*

We really welcome the “Easy access 2 ATCO” file and would like to encourage EASA to produce such a practicable publication as well for SERA.

response

Accepted

An easy-access version will be developed when the whole rule is complete.

### 3.1 Draft EASA Decision — AMC/GM to Commission Regulation (EU) 2015/xxx — GM1 Article 2(89a) Instrument approach procedures

p. 7

comment

5

comment by: *ISAVIA ohf.*

Article 2(89a) was called "Instrument approach operation" in NPA 2014-05 SERA C. Instrument approach procedures is marked as Article 2 nr. 90 in EU923/2012 and also in NPA 2015-14.

response

Accepted

The title will be amended.

comment

17

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

	<p>There is confusion between the titles and the link to the IR.</p> <p><b>GM1 Article 2(89a 90) Instrument approach procedures</b></p> <p><b>GM1 Article 2(90 89a) Instrument approach <del>procedures</del> <u>operations</u></b></p>
response	<p>Accepted</p> <p>The title will be amended.</p>
comment	<p>44 <span style="float: right;">comment by: <i>NATS National Air Traffic Services Limited</i></span></p> <p>Definition 89a is new and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.</p> <p>The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.</p>
response	<p>Noted</p> <p>The publication of the AMC/GM is expected in the course of Q4 of 2016.</p>
comment	<p>115 <span style="float: right;">comment by: <i>Malta Air Traffic Controllers' Association</i></span></p> <p>EASA to amend titles and link to IR</p>
response	<p>Accepted</p> <p>The titles and link to IR will be amended.</p>
comment	<p>163 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>GM1 Article 2(89a) Instrument approach procedures</p> <p>In the draft IR definition 89a is 'Instrument approach operation' and 90 is 'Instrument approach procedure'. Title of GM1 Article 2 (98a) and GM1 Article 2 (90) should be aligned with the draft IR.</p> <p>In case this GM section provides guidance on 'Instrument approach procedure' (not operation), 'operations' should be changed to 'procedures' in the text of the GM.</p>
response	<p>Accepted</p> <p>The title will be amended.</p>
comment	<p>167 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>Definition 89a is new and is planned for implementation on 18th August 2016 as part of amendments to 923/2012 (SSC 60 refers). Publication of Decision on AMC/GM stated as Q2</p>



	<p>2016. The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.</p>
response	<p>Noted</p> <p>The publication of the AMC/GM is expected in the course of Q4 of 2016.</p>

comment	<p>211 <span style="float: right;">comment by: AESA / DSANA</span></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #e6e6fa;"> <th style="text-align: left; padding: 5px;">COMMENT</th> <th style="text-align: left; padding: 5px;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td style="padding: 5px;"> <p>Replace "<b>GM1 Article 2(89a) Instrument approach procedures</b>" title by "<b>GM1 Article 2(89a) Instrument approach operation</b>" for consistency with the definition used in SERA Part C draft current version.</p> <p>For the sake of coherence, replace "<i>Lateral and vertical guidance utilised in an instrument approach procedure...</i>" by "<i>Lateral and vertical guidance utilised in an instrument approach operation...</i>".</p> </td> <td style="padding: 5px;"> <p>"GM1 Article 2(89a) Instrument approach procedures" title does not match the definition used in SERA Part C draft current version "<b>GM1 Article 2(89a) Instrument approach operation</b>" and Instrument approach procedures definition is already covered by (90).</p> <p>The text for (89a) in SERA Part C draft current version is clearly defining instrument approach <b>operations</b>, and the text in NPA refers to "<i>...instrument approach procedure...</i>". Although operations are based in procedures, confusion should be avoided.</p> </td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	<p>Replace "<b>GM1 Article 2(89a) Instrument approach procedures</b>" title by "<b>GM1 Article 2(89a) Instrument approach operation</b>" for consistency with the definition used in SERA Part C draft current version.</p> <p>For the sake of coherence, replace "<i>Lateral and vertical guidance utilised in an instrument approach procedure...</i>" by "<i>Lateral and vertical guidance utilised in an instrument approach operation...</i>".</p>	<p>"GM1 Article 2(89a) Instrument approach procedures" title does not match the definition used in SERA Part C draft current version "<b>GM1 Article 2(89a) Instrument approach operation</b>" and Instrument approach procedures definition is already covered by (90).</p> <p>The text for (89a) in SERA Part C draft current version is clearly defining instrument approach <b>operations</b>, and the text in NPA refers to "<i>...instrument approach procedure...</i>". Although operations are based in procedures, confusion should be avoided.</p>
COMMENT	JUSTIFICATION				
<p>Replace "<b>GM1 Article 2(89a) Instrument approach procedures</b>" title by "<b>GM1 Article 2(89a) Instrument approach operation</b>" for consistency with the definition used in SERA Part C draft current version.</p> <p>For the sake of coherence, replace "<i>Lateral and vertical guidance utilised in an instrument approach procedure...</i>" by "<i>Lateral and vertical guidance utilised in an instrument approach operation...</i>".</p>	<p>"GM1 Article 2(89a) Instrument approach procedures" title does not match the definition used in SERA Part C draft current version "<b>GM1 Article 2(89a) Instrument approach operation</b>" and Instrument approach procedures definition is already covered by (90).</p> <p>The text for (89a) in SERA Part C draft current version is clearly defining instrument approach <b>operations</b>, and the text in NPA refers to "<i>...instrument approach procedure...</i>". Although operations are based in procedures, confusion should be avoided.</p>				
response	<p>Accepted</p> <p>The title will be amended.</p>				

comment	<p>285 <span style="float: right;">comment by: ENAV</span></p> <p>GM1 Article 2(89a) Instrument approach procedures</p> <p>In the draft IR definition 89a is 'Instrument approach operation' and 90 is 'Instrument approach procedure'. Title of GM1 Article 2 (98a) and GM1 Article 2 (90) should be aligned with the draft IR.</p> <p>In case this GM section provides guidance on 'Instrument approach procedure' (not operation), 'operations' should be changed to 'procedures' in the text of the GM.</p>
response	<p>Accepted</p> <p>The title will be amended.</p>

comment	<p>286 <span style="float: right;">comment by: ENAV</span></p> <p>Definition 89a is new and is planned for implementation on 18<sup>th</sup> August 2016 as part of</p>
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response	<p>amendments to 923/2012 (SSC 60 refers). Publication of Decision on AMC/GM stated as Q2 2016.</p> <p>The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.</p> <p>Noted</p> <p>The publication of the AMC/GM is expected in the course of Q4 of 2016.</p>
comment	<p>389 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 7, 8, 9, 18-19, 20-24</p> <p><b>Paragraph No:</b> GM1 Article 2(89a), GM1 Article 2(90), GM1 Article 2(129a), GM1 SERA.5005(c)(3)(iii), GM1 SERA.11014, GM2 SERA.11015</p> <p><b>Comment:</b> Several definitions (introduction of or amendment to) are planned for SERA Part C 'Phase 1' implementation. It is therefore assumed that the supporting GM will take effect on the same day as SERA Part C 'Phase 1'. Agency confirmation that this will be the case, and of the means by which Member States, Competent Authorities and industry will be notified is requested..</p> <p><b>Justification:</b> Clarification</p>
response	<p>Noted</p> <p>The publication of the AMC/GM is expected in the course of Q4 of 2016.</p>
comment	<p>456 <span style="float: right;">comment by: European Cockpit Association</span></p> <p><b>GM to Article 2 (89a) &amp; (90) - respectively (90) &amp; (91), depending on the reference material.</b></p> <p>The title of GM1 (89a) is wrong. Article 2 (89a) refers to <b>Instrument approach operations</b> and not to <b>Instrument approach procedure</b>. For consistency, the titles need to be harmonised between the Regulation and the associated AMC/GM. The title of (new) proposed GM1 Article 2(89a) should be amended to read "<i>Instrument approach operations</i>"</p> <p>If the text starting with "Lateral and vertical guidance utilised ..." would be moved from (90) (procedures) to (89) as proposed, the wording would need to be adapted accordingly: "<i>Lateral and vertical guidance utilised in <del>an instrument approach procedure</del> instrument approach operations refers to the guidance provided either by: ...</i>"</p> <p>Alternatively, it is suggested NOT to move the text from (90) to (89a), and leave the (existing) wording intact.</p> <p>In any case, the new additional text proposed for (90) is supported. Note: The numbering should be checked for consistency.</p>



response Accepted  
The title will be amended.

**3.1 Draft EASA Decision — AMC/GM to Commission Regulation (EU) 2015/xxx — GM1 Article 2(90) Instrument approach procedure**

p. 7-8

comment 18 comment by: *ATCEUC - Air Traffic Controllers European Unions Coordination*  
There is confusion between the titles and the link to the IR.

**GM1 Article 2(89a 90) Instrument approach procedures**

**GM1 Article 2(90 89a) Instrument approach ~~procedures~~ operations**

response Accepted  
The title will be amended.

comment 45 comment by: *NATS National Air Traffic Services Limited*  
Definition 90 is being amended and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.  
The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.

response Noted  
The publication of the AMC/GM is expected in the course of Q4 of 2016.

comment 46 comment by: *NATS National Air Traffic Services Limited*  
Definition 90 is being amended and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). New GM proposed for revised definition but GM1 Article 2(90) already exists in ED 2013/013/R.  
Not clear what the procedure is for amending existing GM1 Article 2 (90). Is there a plan to amend ED 2013/013/R?

response Noted  
The upcoming Decision will amend this.

comment 116 comment by: *Malta Air Traffic Controllers' Association*  
EASA should amend title and link to the IR



response Accepted  
The title and link to IR will be amended.

comment 212 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
<p><b>GM1 Article 2(90) "Instrument approach procedure"</b> item is a bit confusing, since definition is for Instrument approach <b>procedures</b> and the text proposed in NPA deals with Instrument approach <b>operations</b>, which are already covered by <b>GM1 Article 2(89a)</b>. If the clarification proposed in (90) deals with operations, it should be included in (89a); to keep it in (90) it should refer to procedures.</p>	<p>The proposal in NPA reads: "GM1 Article 2(90) <i>Instrument approach procedure</i> <i>Instrument approach operations are classified based on...</i>" Therefore, there is some confusion between (89a) and (90), and operations and procedures.</p>

response Accepted  
The title will be amended.

comment 492 comment by: FNAME

The FNAME wonders why the minima for the different categories are not the same as the ones described in the European regulation n°965/2012 reminded here-below:

Regulation 965/2012:

"(12) 'category I (CAT I) approach operation' means a precision instrument approach and landing using an instrument landing system (ILS), microwave landing system (MLS), GLS (ground-based augmented global navigation satellite system (GNSS/GBAS) landing system), precision approach radar (PAR) or GNSS using a satellite-based augmentation system (SBAS) with a decision height (DH) not lower than 200 ft and with a runway visual range (RVR) not less than 550 m for aeroplanes **and 500 m for helicopters**;

[...]

(14) 'category IIIA (CAT IIIA) operation' means a precision instrument approach and landing operation using ILS or MLS with:

- (a) DH lower than 100 ft; and
- (b) RVR not less than **200 m**;



(15) 'category IIIB (CAT IIIB) operation' means a precision instrument approach and landing operation using ILS or MLS with:

- (a) DH lower than **100 ft**, or no DH; and
- (b) RVR lower than **200 m** but not less than **75 m**;"

For the CAT I, to be more specific there should be a distinction between the minima regarding the Runway Visual Range expected from an aircraft (which should "not be less than 550 m" as it is stated in this NPA and in the European Regulation 965/2012) and the one for a helicopter (which should not be less than 500 m, according to the regulation 965/2012).

Regarding the CAT IIIA, the FNAM wonders why the runway visual range should not be less than 175 m whereas in the regulation 965/2012 it is stated that the runway visual range should not be less than 200 m.

Finally, another question is raised regarding the minima for CAT IIIB which are not consistent with the ones written in the European regulation 965/2012.

response Not accepted

SERA defines the type of IA operations, not the values for the minima.

### 3.1 Draft EASA Decision — AMC/GM to Commission Regulation (EU) 2015/xxx — GM1 to Article 2(129a) Toy aircraft

p. 8

comment	6	comment by: ISAVIA ohf.
	Neither EU923/2012 nor NPA 2014-05 SERA C mentions toy aircraft or Article 2(129a)	
response	Noted	
	The definition for 'toy aircraft' was introduced by the SSC in SERA Part C in 2015.	
comment	47	comment by: NATS National Air Traffic Services Limited
	Definition 129a is new and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.	
	The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.	
response	Noted	
	The publication of the AMC/GM is expected in the course of Q4 of 2016.	
comment	148	comment by: René Meier, Europe Air Sports



	<p>Page 8/77</p> <p>GM1 to Article 2/129a) Toy aircraft Please delete this provision.</p> <p>Rationale: It has nothing to do with operational provisions for aircraft, and aircraft have nothing to do with the behaviour of children. Wath is published here has to do "consumer protection, not with aviation. AMC/GM to SERA Part C is not the place to deal with such problems.</p>
response	<p>Not accepted</p> <p>The definition for 'toy aircraft' was introduced since toy aircraft are excluded from the scope.</p>
comment	<p>344 <span style="float: right;">comment by: CANSO</span></p> <p>Instead of giving a short summary of the Directive, a reference would be more appropriate, e.g. Requirements prescribed in Directive 2009/48/EC (the Toy Safety Directive) are applicable to toy aircrafts</p>
response	<p>Not accepted</p> <p>The definition for 'toy aircraft' was introduced by the SSC in SERA Part C in 2015</p>
comment	<p>383 <span style="float: right;">comment by: ENAV</span></p> <p>Instead of giving a short summary of the Directive, a reference would be more appropriate, e.g. Requirements prescribed in Directive 2009/48/EC (the Toy Safety Directive) are applicable to toy aircrafts</p>
response	<p>Not accepted</p> <p>The definition for 'toy aircraft' was introduced by the SSC in SERA Part C in 2015</p>
comment	<p>502 <span style="float: right;">comment by: ENAC Italy</span></p> <p>Replace the text with "Aircraft marked in accordance with Directive 2009/48/EC are presumed to comply with the definition of Toy Aircraft"</p> <p>Justification: Guidance is needed to a practical and easy-to-verify method to determine whether an aircraft is a toy or not.</p>
response	<p>Not accepted</p> <p>The definition for 'toy aircraft' was introduced by the SSC in SERA Part C in 2015</p>

**3.1 Draft EASA Decision — AMC/GM to Commission Regulation (EU) 2015/xxx — GM1 Article 8.2  
Transitional and additional measures**

p. 8-9



comment	131	comment by: René Meier, Europe Air Sports
	<p>Page 8/77 GM1 Article 8.2 Transitional and additional measures (b) Example (b) is dealing with parts of class F or G airspace to be designated as RMZ and/or TMZ.</p> <p>Proposal: Please write '(b) if the competent authority designates certain parts of class E or G airspace as RMZ and or TMZ ...'</p> <p>Rationale: Mentioning class F airspace is surprising as far as Member States were obliged to remove class F airspace. Furthermore, class E airspace is not considered although RMZ and/or TMZ might be established in class E airspace.</p>	
response	<p>Not accepted</p> <p>The reference to the competent authority is already included in the introductory sentence.</p>	
comment	132	comment by: René Meier, Europe Air Sports
	<p>Page 8/77 GM1 Article 8.2 Transitional and additional measures (c) <i>Minima</i> is the Latin plural of <i>minimums</i>, and it prevails in registers of English where Latin forms are typically favoured over newer English forms, mainly in science and mathematics. Outside these fields, the English plural, <i>minimums</i>, is preferred by a large margin.</p> <p>Well, well, well, not by Duffy, by Langenscheidt: He says "pl.: minima"</p>	
response	<p>Noted</p>	
comment	457	comment by: European Cockpit Association
	<p>Example (b) in the proposed text makes reference to the designation of "certain parts of Classes F or G airspace as Radio Mandatory Zones (RMZs) and/or as Transponder Mandatory Zones (TMZs) in accordance with SERA.6005". The reference to "Classes F or G" is not appropriate and may be misleading or confusing, as SERA.6005 also mentions Class E for RMZs and does not link TMZs to any Airspace Class. The words "Classes F or G" should be deleted.</p>	
response	<p>Accepted.</p> <p>The reference to certain airspace classes will be removed.</p>	



<b>Stop Bars — contingency measures</b>
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comment	<p data-bbox="359 336 383 369">1</p> <p data-bbox="861 336 1498 369" style="text-align: right;">comment by: <i>Flughafen Berlin Brandenburg GmbH</i></p> <p data-bbox="359 392 1498 537">Sound contingency procedures need to be implemented in case of technical failures of stop bars. GM1 SERA.3210(d)(3) requires the air traffic service provider to develop such procedures and refers within para (c) to the provision of follow-me vehicles for the guidance of aircraft across lit stop bars.</p> <p data-bbox="359 571 1498 716">While the manoeuvring area certainly is within the air traffic service provider's area of competency, the drivers of follow-me vehicles are in most cases staff of the relevant aerodrome operator. Furthermore, the reactive (technical) measures described in para (a) and (b) might not necessarily be performed by staff of the air traffic service provider.</p> <p data-bbox="359 750 1498 929">In order to provide a clear guidance for staff and in context with the the requirements stipulated by commission regulation (EU) 139/2014 - see AMC1 ADR.OPS.B.025, section (a)(3), GM2 ADR.OPS.B.025, section (c)(3), and AMC2 ADR.OPS.B.015, section (c) in this context - air traffic service provider <u>and</u> aerodrome operator should agree jointly on contingency procedures.</p> <p data-bbox="359 963 1498 1041">Hence, the following wording might better reflect the requirement for a joint development of such arrangements:</p> <p data-bbox="359 1075 1498 1153">"In cooperation with relevant third parties (e.g. the aerodrome operator) the service provider may consider, inter alia, the following:</p> <ul data-bbox="359 1153 1498 1288" style="list-style-type: none"> <li>(a) Physically disconnecting the respective lit stop bar from its power supply;</li> <li>(b) Physically obscuring the lights of the lit stop bar; or</li> <li>(c) Providing for a marshaller or a follow-me vehicle to lead the aircraft to cross the lit stop bar." </li></ul>
response	<p data-bbox="359 1299 526 1344">Not accepted</p> <p data-bbox="359 1366 1244 1411">The practical application depends on the local operational arrangements.</p>
comment	<p data-bbox="359 1478 391 1512">42</p> <p data-bbox="1173 1478 1498 1512" style="text-align: right;">comment by: <i>Jan Loncke</i></p> <p data-bbox="359 1545 542 1579">Attachment <a href="#">#1</a></p> <p data-bbox="359 1601 1498 1668">I suggest to mention another possibility, to expand the considerations mentioned in 'inter alia' in line with what is actually already provided for on Brussels Airport.</p> <p data-bbox="359 1668 1498 1736">In annex I add a copy of what is published accordingly in AIP Belgium (&amp; GD Luxembourg) AD2.20 Local Aerodrome Regulations, 2 Taxi Regulations, 2.2 Use of stopbars.</p> <p data-bbox="359 1780 1498 1848">The text of <b>GM1 SERA.3210(d)(3) Use of Stop Bars - contingency measures</b> may then look as follows :</p> <p data-bbox="359 1848 1372 1881">"When considering ... . The service provider may consider, inter alia, the following:</p> <ul data-bbox="359 1881 1498 2031" style="list-style-type: none"> <li>(a) Physically disconnecting the respective lit stop bar from its power supply;</li> <li>(b) Physically obscuring the lights of the lit stop bar; or</li> <li>(c) Rerouting. If rerouting is not possible, the service provider may clear the aircraft or vehicle to cross a lit stopbar, stating the reason why the stopbar remains lit in each individual</li> </ul>



	<p>clearance; or (d) Providing for a marshaller or a follow-me vehicle to lead the aircraft to cross the lit stop bar.</p>
response	<p>Not accepted</p> <p>The vast majority of stakeholders are of the opinion that the lit stop bars shall not be crossed in any circumstances. This item has been subject to in-depth analysis and consultation in the context of IR SERA Part C and, for safety reasons, the final decision was to exclude the option of a radio clearance allowing to cross lit stop bars.</p>
comment	<p>111 <span style="float: right;">comment by: <i>Glasgow Prestwick Airport</i></span></p> <p>GM1 sera3210 use of stop bars, Piont (c) provide lead marshaller or follow me vehicle to lead the aircraft to cross the lit stop bar.</p> <p>The problem with this is that vehicles are not permitted to cross a lit stop bar either therefor the provision of a follow me car or Marshaller does not help. The important factors are, The recognition by the pilot that they require to to cross a lit stop bar and are not permitted to do so unless they are certain it is safe to do so and by the Air Traffic controlor that it is safe for the aircraft to cross the lit stop bar that cannot be switched off for whatever reason. Propose change item (C) with. providing positive clearance acknowledging the Lit stop bar; Example : Aircraft XXXX Hold position. You are clear to cross lit stop bar X to enter runway XX Aircraft XXXX read back, on reciept of positive read back Aircraft XXXX Cross lit stop bar X to enter Runway XX</p>
response	<p>Not accepted</p> <p>The vast majority of stakeholders are of the opinion that the lit stop bars shall not be crossed in any circumstances. This item has been subject to in-depth analysis and consultation in the context of IR SERA Part C and, for safety reasons, the final decision was to exclude the option of a radio clearance allowing to cross lit stop bars.</p>
comment	<p>458 <span style="float: right;">comment by: <i>European Cockpit Association</i></span></p> <p>This GM is expressly supported.</p>
response	<p>Noted.</p>

<p><b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.4001(c)</b> <b>Submission of a flight plan</b></p>	<p>p. 9</p>
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comment	<p>48 <span style="float: right;">comment by: <i>NATS National Air Traffic Services Limited</i></span></p> <p>IN CASES WHERE NO AIR TRAFFIC SERVICES REPORTING OFFICE HAS BEEN ESTABLISHED, THE</p>
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FLIGHT PLAN SHOULD BE SUBMITTED TO THE ATS UNIT PERFORMING THE FUNCTIONS OF SUCH AN OFFICE, AS PRESCRIBED BY THE COMPETENT AUTHORITY AND PUBLISHED IN THE AIP.”

It is not certain that the intention is for the competent authority to prescribe how the flight plan should be submitted to the ATS unit. Following discussions on this issue in ADPSG 65 (WP65.03) and NETOPS 12 (WP08), it was agreed that the flight plan may be submitted by means other than physically to an entity at a reporting office or an ATS unit and that in acknowledging advances in technology, pilots now have the option to submit flight plans via web portals. The agreement was that other acceptable means for submitting flight plans were to be published in the AIP by the competent authority. PfA to PANS-ATM proposed to COG.

The current text does not provide clarity on the role of the competent authority and doesn't take into account recent Eurocontrol agreement on the role of the competent authority

Suggest instead:

“In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, **or** as prescribed by the competent authority and published in the AIP.”

response

Partially accepted

The rationale behind this AMC was to reflect the work described in the comment, and it is accepted that the wording may be improved for clarity. The text will be amended to reflect the text approved by EANPG57 in November 2015, as follows:

*'In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).'*

comment

133

comment by: René Meier, Europe Air Sports

Page 9/77

AMC1 SERA.4001(c)

Submission of a flight plan

Consider the current developments in the EU where a CFMU has been established in 1988 upon an initiative from the ECAC. Consider EAD centralized service currently provided by Eurocontrol.

Consider national developments such as in Switzerland where only one ARO is running, in France where the number of civil AROs has been reduced over the last decades from 70 down to a handful of AROs.

Proposal:

Replace the current provision by one aiming at supporting the establishment of national AROs and/or a centralised European ARO to which flight plans will be submitted in a very user-friendly way.

Rationale:

The proposed original wording refers to older times, not to modern times.



response Partially accepted  
The rationale behind this AMC was to reflect the work described in the comment, and it is accepted that the wording may be improved for clarity. The text will be amended to reflect the text approved by EANPG57 in November 2015, as follows:  
*'In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).'*

comment 170 comment by: CANSO  
AMC SERA.4001(c)  
"IN CASES WHERE NO AIR TRAFFIC SERVICES REPORTING OFFICE HAS BEEN ESTABLISHED, THE FLIGHT PLAN SHOULD BE SUBMITTED TO THE ATS UNIT PERFORMING THE FUNCTIONS OF SUCH AN OFFICE, AS PRESCRIBED BY THE COMPETENT AUTHORITY AND PUBLISHED IN THE AIP."  
It is not certain that the intention is for the competent authority to prescribe how the flight plan should be submitted to the ATS unit. Following discussions on this issue in ADPSG 65 (WP65.03) and NETOPS 12 (WP08), it was agreed that the flight plan may be submitted by means other than physically to an entity at a reporting office or an ATS unit and that in acknowledging advances in technology, pilots now have the option to submit flight plans via web portals. The agreement was that other acceptable means for submitting flight plans were to be published in the AIP by the competent authority. PfA to PANS-ATM proposed to COG  
GM1 SERA.4005(a) already exists in ED 2013/013/R and no reference to deletion.  
Impact: Current text does not provide clarity on the role of the competent authority and doesn't take into account recent Eurocontrol agreement on the role of the competent authority  
Suggest Resolution: "In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or as prescribed by the competent authority and published in the AIP."

response Partially accepted  
The rationale behind this AMC was to reflect the work described in the comment, and it is accepted that the wording may be improved for clarity. The text will be amended to reflect the text approved by EANPG57 in November 2015, as follows:  
*'In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).'*

comment 289 comment by: ENAV  
AMC SERA.4001(c)  
"IN CASES WHERE NO AIR TRAFFIC SERVICES REPORTING OFFICE HAS BEEN ESTABLISHED, THE FLIGHT PLAN SHOULD BE SUBMITTED TO THE ATS UNIT PERFORMING THE FUNCTIONS OF SUCH AN OFFICE, AS PRESCRIBED BY THE COMPETENT AUTHORITY AND PUBLISHED IN THE AIP."



It is not certain that the intention is for the competent authority to prescribe how the flight plan should be submitted to the ATS unit. Following discussions on this issue in ADPSG 65 (WP65.03) and NETOPS 12 (WP08), it was agreed that the flight plan may be submitted by means other than physically to an entity at a reporting office or an ATS unit and that in acknowledging advances in technology, pilots now have the option to submit flight plans via web portals. The agreement was that other acceptable means for submitting flight plans were to be published in the AIP by the competent authority. PfA to PANS-ATM proposed to COG GM1 SERA.4005(a) already exists in ED 2013/013/R and no reference to deletion. Impact: Current text does not provide clarity on the role of the competent authority and doesn't take into account recent Eurocontrol agreement on the role of the competent authority

Suggest Resolution: "In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or as prescribed by the competent authority and published in the AIP."

response

Partially accepted

The rationale behind this AMC was to reflect the work described in the comment, and it is accepted that the wording may be improved for clarity. The text will be amended to reflect the text approved by EANPG57 in November 2015, as follows:

*'In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).'*

comment

390

comment by: UK CAA

**Page No:** 9**Paragraph No:** AMC1 SERA.4001(c)**Comment:**

It is not clear whether the proposed text intends for the competent authority to prescribe how the flight plan should be submitted to the ATS unit. Following discussions on this issue at ADPSG 65 and NETOPS 12, it was agreed that the flight plan may be submitted by means other than physically to an entity at a reporting office or an ATS unit and that in acknowledging advances in technology, pilots now have the option to submit flight plans via web portals. The agreement was that other acceptable means for submitting flight plans were to be published in the AIP by the competent authority.

**Justification:**

The UK CAA believes the current text does not provide clarity on the role of the competent authority.

**Proposed Text:****"AMC1 SERA.4001(c) Submission of a flight plan**

	In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, <b>or</b> as prescribed by the competent authority and published in the AIP.”
response	Partially accepted The rationale behind this AMC was to reflect the work described in the comment, and it is accepted that the wording may be improved for clarity. The text will be amended to reflect the text approved by EANPG57 in November 2015, as follows: <i>‘In cases where no air traffic services reporting office has been established, the flight plan should be submitted to the ATS unit performing the functions of such an office, or via approved direct methods as indicated in the aeronautical information publication (AIP).’</i>

### 3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.4005(a) Contents of a flight plan

p. 9

comment	49 comment by: <i>NATS National Air Traffic Services Limited</i> GM1 SERA.4005(a) already exists in ED 2013/013/R and no reference to deletion. Therefore it is not clear what the procedure is for amending existing GM1 SERA.4005(a). Is there a plan to amend ED 2013/013/R? If however this is a typo, rename as GM2.
response	Accepted The GM in discussion will be renamed as GM2.
comment	50 comment by: <i>NATS National Air Traffic Services Limited</i> “INFORMATION FOR THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE”. Title of GM is confusing as it is not clear who the GM is directed to. SERA.4005 refers to contents of a flight plan and this is primarily for compliance by Operators. First sentence of GM places a requirement on the ATS unit. Second sentence of GM appears to place a requirement on the Operator. Suggest instead: “INFORMATION <b>ABOUT</b> <del>FOR</del> THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE. According to ICAO Annex 11, an ATS unit shall, when practicable, inform the aircraft operator when <b>an</b> alerting service is provided to an aircraft. In order to facilitate quick and effective coordination, it is advisable <b>for the Operator to</b> provide in the flight plan (item 18 ‘Other information’), information sufficient to <b>enable the ATS unit to</b> contact the on-duty staff of the aircraft operator if such information has not been provided to the ATS unit by other means.”
response	Partially accepted The text will be amended to take parts of the comment into account.



comment	<p>171</p> <p>GM1 SERA.4005 (a) Contents of a flight plan</p> <p>GM1 SERA.4005(a) already exists in ED 2013/013/R and no reference to deletion. Not clear what the procedure is for amending existing GM1 SERA.4005(a). Is there a plan to amend ED 2013/013/R. If typo, rename as GM2</p> <p>This GM apparently refers to the ICAO flight plan format and not to the issues detailed in SERA 4005 (a). It would be useful to take over the ICAO flight plan format. Item 18 of the ICAO format is not the most appropriateness place for the information concerned. Item 19: supplementary information is more appropriate. However in our view such information should better be placed at a different location than the flight plan, since this is related to emergencies.</p> <p>An example of the format for the item 18 of the flightplan would be appreciated.</p> <p>“INFORMATION FOR THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE”.</p> <p>Title of GM is confusing as it is not clear who the GM is directed to. SERA.4005 refers to contents of a flight plan and this is primarily for compliance by Operators. First sentence of GM places a requirement on the ATS unit. Second sentence of GM appears to place a requirement on the Operator.</p> <p>“INFORMATION <i>ABOUT</i> FOR THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE.</p> <p>According to ICAO Annex 11, an ATS unit shall, when practicable, inform the aircraft operator when <i>an</i> alerting service is provided to an aircraft. In order to facilitate quick and effective coordination, it is advisable <i>for the Operator to</i> provide in the flight plan (item 18 ‘Other information’), information sufficient to <i>enable the ATS unit to</i> contact the on-duty staff of the aircraft operator if such information has not been provided to the ATS unit by other means.”</p>	comment by: <i>CANSO</i>
response	<p>First part: Accepted</p> <p>The GM in discussion will be renamed.</p> <p>Second part: Not accepted</p> <p>Third part: Partially accepted</p>	
comment	<p>290</p> <p>GM1 SERA.4005 (a) Contents of a flight plan</p> <p>GM1 SERA.4005(a) already exists in ED 2013/013/R and no reference to deletion. Not clear what the procedure is for amending existing GM1 SERA.4005(a). Is there a plan to amend ED 2013/013/R. If typo, rename as GM2</p> <p>This GM apparently refers to the ICAO flight plan format and not to the issues detailed in SERA 4005 (a). It would be useful to take over the ICAO flight plan format. Item 18 of the ICAO format is not the most appropriateness place for the information concerned. Item 19:</p>	comment by: <i>ENAV</i>



supplementary information is more appropriate. However in our view such information should better be placed at a different location than the flight plan, since this is related to emergencies.

An example of the format for the item 18 of the flightplan would be appreciated.

“INFORMATION FOR THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE”.

Title of GM is confusing as it is not clear who the GM is directed to. SERA.4005 refers to contents of a flight plan and this is primarily for compliance by Operators. First sentence of GM places a requirement on the ATS unit. Second sentence of GM appears to place a requirement on the Operator.

“INFORMATION ~~FOR~~ *ABOUT* THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE.

According to ICAO Annex 11, an ATS unit shall, when practicable, inform the aircraft operator when *an* alerting service is provided to an aircraft. In order to facilitate quick and effective coordination, it is advisable *for the Operator to* provide in the flight plan (item 18 ‘Other information’), information sufficient to *enable the ATS unit to* contact the on-duty staff of the aircraft operator if such information has not been provided to the ATS unit by other means.”

response See the response to comment No 171.

comment 323 comment by: *DFS Deutsche Flugsicherung GmbH*

An example of the format for the item 18 of the flightplan would be appreciated.

response Not accepted

Plain language can be used.

comment 367 comment by: *CAA-NL*

**GM1 SERA.4005(a) Contents of a flight plan**

This GM apparently refers to the ICAO flight plan format and not to the issues detailed in SERA 4005 (a). It would be useful to follow the specific lay out of the ICAO flight plan format as this format is the international standard. Item 18 of the ICAO format is not the most appropriate place for the information concerned and would clutter the item. Item 19: supplementary information is specifically meant for the purpose of providing additional information related to airplane emergency equipment and other information useful in the event of a

response Noted

comment 391 comment by: *UK CAA*

**Page No: 9**



**Paragraph No:** GM1 SERA.4005(a)

**Comment:**

GM1 SERA.4005(a) Contents of a flight plan already features in Annex to ED Decision 2013/013/R. The UK CAA believes that the text proposed in NPA 2015-14 appears to be additional rather than replacement text and so needs to be numbered as such and requests that the Agency confirm that is indeed the case.

**Justification:**

Clarification and correct paragraph numbering.

**Proposed Text:**

Renumber proposed GM1 SERA.4005(a) to read **“GM2 SERA.4005(a) Contents of a flight plan”**

response

Accepted

The GM in discussion will be amended.

comment

392

comment by: UK CAA

**Page No:** 9

**Paragraph No:** GM1 SERA.4005(a)

**Comment:**

The title of the proposed GM is confusing as it is not clear to whom it is directed. SERA.4005 refers to contents of a flight plan and this is primarily for compliance by Operators. The first sentence of the GM places a requirement on the ATS unit. The second sentence of GM appears to place a requirement on the Operator.

**Justification:**

Clarification of applicable actor.

**Proposed Text:**

Renumber proposed GM1 SERA.4005(a) to read **GM2 SERA.4005(a) Contents of a flight plan and amend to read:**

**“INFORMATION PROVIDED IN THE FLIGHT PLAN CONCERNING THE AIRCRAFT OPERATOR.**  
According to ICAO Annex 11, an ATS unit shall, when practicable, inform the aircraft operator when an alerting service is provided to an aircraft. In order to facilitate quick and effective coordination, it is advisable for **the Operator** to provide in the flight plan (item 18 ‘Other information’), information sufficient to enable the ATS unit to contact the on-duty staff of the aircraft operator if such information has not been provided to the ATS unit by other means.”

response

Partially accepted

See response to comment No 50.



comment	504	comment by: <i>ENAC Italy</i>
	Item 19 "supplementary info" should be uysed instead of item 18.	
	Justification: Item 19 appears to be more appropriate.	
response	Not accepted	
comment	505	comment by: <i>ENAC Italy</i>
	Replace the title with the following:	
	"INFORMATION <del>FOR</del> <i>ABOUT</i> THE OPERATOR IN THE FLIGHT PLAN IN CASE OF PROVIDING ALERTING SERVICE.	
	Justification: info are about the operator and not for the operator.	
response	Partially accepted See response to comment No 50.	

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.5005(c)(3)(iii)  
Night VFR on top**

p. 9-10

comment	2	comment by: <i>Antoine ROGUES</i>
	Redactional proposition: instead of "the pilot may elect to fly above a cloud layer (VFR on top)", replace this statement by "the pilot may elect to fly above some clouds layers (VFR on top)". In case of severals clouds layers.	
response	Not accepted	
comment	12	comment by: <i>CAA-Norway</i>
	CAA-Norway propose to add a new paragraph g) highlighting the challenges connected to winter operations, e.g. low temperature and wind correction, white out and iceing conditions.	
response	Not accepted These would be addressed in the context of OPS and training and are of operational nature rather than of 'rules-of-the-air nature'.	
comment	19	comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i>
	The night VFR on top may be considered as guidance material but we believe the list of considerations to be taken by a pilot which makes the decision to fly above or below a cloud	





	at night should be considered AMC.
response	Not accepted It will remain as GM only since it provides examples but not means of compliance.
comment	<b>51</b> <i>comment by: NATS National Air Traffic Services Limited</i> SERA.5005 is being amended and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.  The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.
response	Accepted The publication of the AMC/GM is expected in the course of Q4 of 2016.
comment	<b>110</b> <i>comment by: British Helicopter Association</i> For single-engine helicopters flying at night over low cloud or fog, consideration should be given to the ability to conduct a safe autorotative landing in the event of mechanical failure. For single-engine helicopters flying at night VFR on top, consideration should be given to the ability to continue an autorotative descent below cloud in VMC sufficient to establish a safe forced landing.
response	Not accepted These would be considered as operational issues.
comment	<b>113</b> <i>comment by: Malta Air Traffic Controllers' Association</i> EASA should include unlawful interference AMC/GM in SERA
response	Noted This has already been included in SERA.11001.
comment	<b>114</b> <i>comment by: Malta Air Traffic Controllers' Association</i> EASA should include GM on Night VFR on top in SERA Part C
response	Noted GM to SERA.5005 is already proposed in the NPA and has been subject to this consultation.
comment	<b>117</b> <i>comment by: Malta Air Traffic Controllers' Association</i>



response	<p>List of considerations taken by PIC during night VFR on top should be AMC since he decides to fly above or below a cloud layer.</p> <p>Not accepted</p> <p>See response to comment No 19.</p>
comment	<p>134 <span style="float: right;">comment by: <i>René Meier, Europe Air Sports</i></span></p> <p>Pages 9/77 and 10/77 GM1 SERA.5005(c)(3)(iii) Night VFR on top An experienced, well-trained pilot flying a suitably equipped aircraft will also respect your proposals (a) to (f), his/her flight operations will be safe. This provision has to be addressed as a safety issue and should be harmonised with FAA and ICAO.</p> <p>Alternative proposal: Put this provision on hold until further studies and considerations clearly show that the safety of that kind of flight is not at risk.</p> <p>Rationale: This is a safety issue, not an operational provision. In addition, what is proposed is "standard operations procedure" and knowledge we get at basic flight training level already. Your text proposal "...consideration should be given at least but not limited to the following" is confusing and of not much help. On the other hand no pilot will engage in risky operations, "Night VFR on top" will be flown by those who are able to do so. Good airmanship, adequate training and appropriate experience are the key factors that count: "Night VFR on top" may be easy in many areas of Europe, difficult in others. Airspace still is a national domain, so delegate the competence to the nations.</p>
response	<p>Not accepted</p> <p>This GM was requested by several stakeholders asking to provide examples.</p>
comment	<p>356 <span style="float: right;">comment by: <i>KSAK</i></span></p> <p>Royal Swedish Aeroclub (KSAK) support this.</p>
response	<p>Noted</p>
comment	<p>393 <span style="float: right;">comment by: <i>UK CAA</i></span></p> <p><b>Page No:</b> 9-10</p> <p><b>Paragraph No:</b> GM1 SERA.5005(c)(3)(iii), GM1 SERA.5010, GM1 SERA.5010(a)(2), GM2 SERA.5010(b),</p> <p><b>Comment:</b></p>



Several current items of GM are affected by SERA Part C 'Phase 1' implementation. It is therefore assumed that associated changes to these will take effect on the same day as SERA Part C 'Phase 1'. The UK CAA requests Agency confirmation that this will be the case, and of the means by which Member States, Competent Authorities and industry will be notified..

**Justification:**  
Clarification.

response

Accepted

The publication of the AMC/GM is expected in the course of Q4 of 2016.

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.5010 Special VFR in control zones**

p. 10

comment

52

comment by: *NATS National Air Traffic Services Limited*

Comment applies to: GM1 SERA.5010 & GM1 SERA.5010(a)(2) & GM2 SERA.5010(b), Page 10

SERA.5010 is being amended and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.

The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.

response

Accepted

The publication of the AMC/GM is expected in the course of Q4 of 2016.

comment

53

comment by: *NATS National Air Traffic Services Limited*

SERA.5010 is being replaced and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Existing AMC1 and GM1 to SERA.5010(a)(3) no longer applicable. Suggest retaining existing AMC and GM to SERA.5010(a)(3) but re-title as AMC1 SERA.5010(b)(3) & GM2 SERA/5010(b)(3)

response

Accepted

They will be revised.

comment

292

comment by: *ENAV*

SERA.5010 is being replaced and is planned for implementation on 18 August 2016 as part of amendments to 923/2012 (SSC 60 refers). SERA.5010(a)(2) will no longer exist so GM will no longer applicable.

Clarification on alignment of existing AMC/GM with new GM.



response	Suggested resolution: Re-title GM as GM1 SERA.5010(b)(2). Accepted See response to comment 53.
comment	357 <span style="float: right;">comment by: KSAK</span> KSAK support this
response	Noted
comment	394 <span style="float: right;">comment by: UK CAA</span> <b>Page No:</b> 10 <b>Paragraph No:</b> SERA.5010 <b>Comment:</b> SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing AMC1 and GM1 to SERA.5010(a)(3) will no longer be applicable. <b>Justification:</b> Clarification on alignment of existing AMC/GM with new GM. <b>Proposed Text:</b> “Retain existing AMC and GM to SERA.5010(a)(3) but re-title as AMC1 SERA.5010(b)(3) & GM2 SERA/5010(b)(3).”
response	Accepted They will be revised.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.5010(a)(2)  
Special VFR in control zones**

p. 10

comment	54 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span> GM1 SERA.5010(a)(2), Page 10  SERA.5010 is being replaced and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). SERA.5010(a)(2) will no longer exist so GM will no longer applicable.  NATS seeks clarification on alignment of existing AMC/GM with new GM and would suggest re-titling GM as GM1 SERA.5010(b)(2).
response	Accepted



The GM in discussion will be revised.

comment 136 comment by: René Meier, Europe Air Sports

Page 10/77  
GM1 SERA.5010(a)(2)  
Special VFR in control zones  
Compliance with the last sentence would require a data-linked weather service provided by a MET office and appropriate on-board equipment. This is in many cases impossible.

Proposal:  
Modify the proposal as follows: ‘... the pilot should possess the latest available weather reports and forecasts;’

Rationale:  
The Agency's proposal stems from "StarTrek", it does not consider any other environment than the one of the most modern CS-25 aircraft.

response Not accepted

comment 174 comment by: CANSO

SERA.5010 is being replaced and is planned for implementation on 18th August 2016 as part of amendments to 923/2012 (SSC 60 refers). SERA.5010(a)(2) will no longer exist so GM will no longer applicable.  
Clarification on alignment of existing AMC/GM with new GM.  
Suggested resolution: Re-title GM as GM1 SERA.5010(b)(2).

response Accepted

The GM in discussion will be revised.

comment 215 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
Replace "GM1 SERA.5010(a)(2) Special VFR in control zones" by "GM1 SERA.5010(b)(2) Special VFR in control zones".	With the replacement of <b>SERA.5010</b> made by SERA Part C draft current version, the reference to previous SERA.5010(a)(2) has become SERA.5010(b)(2).

response Accepted

The GM in discussion will be revised.



comment	358	comment by: KSAK
	KSAK support this	
response	Noted	
comment	395	comment by: UK CAA
	<b>Page No:</b> 10	
	<b>Paragraph No:</b> GM1 SERA.5010(a)(2)	
	<b>Comment:</b> SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing SERA.5010(a)(2) will no longer exist so current GM will no longer be applicable.	
	<b>Justification:</b> Realignment of existing AMC/GM with new GM.	
	<b>Proposed Text:</b> "Re-title GM as GM1 SERA.5010(b)(2)."	
response	Accepted	
	The GM in discussion will be revised.	

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.5010(b) Special VFR in control zones**

p. 10

comment	55	comment by: NATS National Air Traffic Services Limited
	GM2 SERA.5010(b), Page 10	
	SERA.5010 is being replaced and is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). GM appears to apply to the ATS provider, and the rule is contained in paragraph 5010(c).	
	NATS seeks clarification on alignment of existing AMC/GM with new GM and suggest re-title GM as GM1 SERA.5010(c).	
response	Accepted	
	The GM in discussion will be revised.	
comment	97	comment by: NSA Austria
	<b>Comment to SERA 5015 (c) 3 which was not selectable:</b>	
	Especially on IFR-Approaches outside controlled airspace that do not end on the runway of	



	<p>local airfields (as an instrument runway is missing) it is not possible to follow the mitigations (e.g. to monitor the airfield frq while in an RMZ) and to report "Cancellation of IFR-flight" to an ATS unit at the same time as this might be only few seconds before touchdown. (specially unsafe for singlepilot acft)</p> <p>AMC/GM should allow to make this report to the local airfield which is obliged to forward this to the relevant ATS unit for closure of flightplan.</p>
response	<p>Not accepted</p> <p>This is up to the national practices. The proposed GM is consistent with ICAO and with SERA.</p>
comment	<p>137 <span style="float: right;">comment by: René Meier, Europe Air Sports</span></p> <p>Page 10/77 GM1 SERA.5010(b) Special VFR in control zones We identify three problems: Firstly, the visibility minimum should depend on two criteria, namely visibility assessed by the pilot and the speed of his aircraft (not more than 140 kt). Secondly, ceiling assessed by the pilot should also be taken into account with a minimum of 600 feet AGL. Thirdly: There are separate rules in place for rotary wings flying machines.</p> <p>Proposal: Revise the proposal to ensure full consistency with the Special VFR minimums as expressed in the rule for all aircraft.</p> <p>Rationale: This provision proposal is not consistent with the VMC criteria in class G airspace.</p>
response	<p>Not accepted</p>
comment	<p>138 <span style="float: right;">comment by: René Meier, Europe Air Sports</span></p> <p>Page 10/77 GM1 SERA.5015(c)(3) Rules applicable to all IFR flights Question: What is the purpose of this provision? To prevent an ATS unit to reply to pilots?</p> <p>Proposal: Another example should be given: the case of an ATS unit replying to a pilot when he acts as a relay between the ATS unit and another pilot. Explain the proposal or delete it.</p> <p>Rationale: It has no obvious added-value.</p>
response	<p>Not accepted</p> <p>The proposed text is directly transposed from ICAO PANS ATM and proposed as additional</p>



guidance.

comment	<p>175 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>GM2 SERA.5010(b) Special VFR in control zones</p> <p>Based on the content of this section, this GM belongs to draft SERA.5010 (c). Please amend the title.</p> <p>If the GM allows exemption from SERA.5010 (c) (1) (ground visibility is less than 1500 m) why the same exemption from (c) (2) (ceiling is less than 180 m) is not allowed?</p> <p>SERA.5010 is being replaced and is planned for implementation on 18th August 2016 as part of amendments to 923/2012 (SSC 60 refers). GM appears to apply to the ATS provider, and the rule is contained in paragraph 5010(c).</p> <p>Clarification on alignment of existing AMC/GM with new GM.</p> <p><u>Suggested resolution:</u> Re-title GM as GM1 SERA.5010(c).</p>
response	<p>Accepted</p> <p>The GM in discussion will be revised.</p>
comment	<p>201 <span style="float: right;">comment by: <i>EM-LPS</i></span></p> <p><i>Comments in italics</i></p> <p>When the reported <b>ground visibility at the aerodrome is less than 1 500 m</b>, ATC may issue a Special VFR clearance for a <b>flight crossing the control zone</b> and not intending to take off or land at an aerodrome within a control zone, or enter the aerodrome traffic zone or aerodrome traffic circuit when the flight visibility reported by the pilot is not less than 1 500 m.</p> <p><i>The text above is not consistent with provision 7.14.1.3, ICAO Doc 4444, where conditions for granting Special VFR clearance based solely on ground visibility are applicable to all flights within CTR :</i></p> <p><b>“When the ground visibility is not less than 1 500 m, special VFR flights may be authorized to: enter a control zone for the purpose of landing, take off and depart from a control zone, cross a control zone or operate locally within a control zone.”</b></p> <p><i>If this option (GM2 SERA.5010(b)) has been made on purpose for any good reason, we would highly appreciate inclusion of similar GM to SERA 5005 (b) as this provision explicitly does not preclude (as well as ANNEX 2 and Doc 4444) granting of VFR clearance for flights just crossing CTR outside of traffic circuit, if reported conditions are below VMC minima and pilot reports flight conditions as VMC. This possibility has been used in Slovakia, although some questions had been arisen regarding commitment to provide separation for Special VFRs. (crossing VFR flight versus e.g. departing Special VFR).</i></p>
response	<p>First part: Noted</p> <p>Second part: Not accepted</p>





comment	216	comment by: AESA / DSANA				
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #e6e6fa;">COMMENT</th> <th style="background-color: #e6e6fa;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>Replace "GM2 SERA.5010(b) Special VFR in control zones" by "GM2 SERA.5010(c) Special VFR in control zones".</td> <td>With the replacement of <b>SERA.5010</b> made by SERA Part C draft current version, the reference to previous SERA.5010(b) has become SERA.5010(c).</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	Replace "GM2 SERA.5010(b) Special VFR in control zones" by "GM2 SERA.5010(c) Special VFR in control zones".	With the replacement of <b>SERA.5010</b> made by SERA Part C draft current version, the reference to previous SERA.5010(b) has become SERA.5010(c).
COMMENT	JUSTIFICATION					
Replace "GM2 SERA.5010(b) Special VFR in control zones" by "GM2 SERA.5010(c) Special VFR in control zones".	With the replacement of <b>SERA.5010</b> made by SERA Part C draft current version, the reference to previous SERA.5010(b) has become SERA.5010(c).					
response	<p>Accepted</p> <p>The GM in discussion will be revised.</p>					

comment	217	comment by: AESA / DSANA				
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #e6e6fa;">COMMENT</th> <th style="background-color: #e6e6fa;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM2 SERA.5010(b) Special VFR in control zones" contents should be corrected, since it is against <b>SERA.5010(c)(1)</b> requirement. Besides, <b>SERA.5010</b> first paragraph allows the competent authority to make some exceptions, but only for helicopters and <b>SERA.5010(c)(1)</b> does not include any additional exception for aircrafts.</td> <td> <p><b>SERA.5010(c)(1)</b> in SERA Part C draft current version clearly states that when the <b>ground visibility is less than 1 500 m</b>, ATC shall not issue a Special VFR clearance to enter the aerodrome traffic zone or aerodrome traffic circuit.</p> <p><b>GM2</b> precisely gives the option to go against the rule in a specific case, when ground visibility is less than 1 500 m, <b>but the flight visibility reported by the pilot is not less than 1 500 m</b>. Although flight visibility is not less than 1500 m, ground visibility is less than 1500 m, and the requirement in this case clearly states that clearance shall not be issued to enter the aerodrome traffic zone or aerodrome traffic circuit.</p> <p>Our opinion is that guidance material should give more information about how to comply with a rule but not how to go around/against it. Anyway, if that specific case had to be allowed, it should be included in the own rule, namely SERA Part C, and of course it could be further clarified in the AMC/GM.</p> </td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	"GM2 SERA.5010(b) Special VFR in control zones" contents should be corrected, since it is against <b>SERA.5010(c)(1)</b> requirement. Besides, <b>SERA.5010</b> first paragraph allows the competent authority to make some exceptions, but only for helicopters and <b>SERA.5010(c)(1)</b> does not include any additional exception for aircrafts.	<p><b>SERA.5010(c)(1)</b> in SERA Part C draft current version clearly states that when the <b>ground visibility is less than 1 500 m</b>, ATC shall not issue a Special VFR clearance to enter the aerodrome traffic zone or aerodrome traffic circuit.</p> <p><b>GM2</b> precisely gives the option to go against the rule in a specific case, when ground visibility is less than 1 500 m, <b>but the flight visibility reported by the pilot is not less than 1 500 m</b>. Although flight visibility is not less than 1500 m, ground visibility is less than 1500 m, and the requirement in this case clearly states that clearance shall not be issued to enter the aerodrome traffic zone or aerodrome traffic circuit.</p> <p>Our opinion is that guidance material should give more information about how to comply with a rule but not how to go around/against it. Anyway, if that specific case had to be allowed, it should be included in the own rule, namely SERA Part C, and of course it could be further clarified in the AMC/GM.</p>
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response	<p>Not accepted</p> <p>A revision of SERA.5010 will be introduced together with this guidance.</p>					



comment	294	comment by: ENAV
	GM2 SERA.5010(b) Special VFR in control zones	
	Based on the content of this section, this GM belongs to draft SERA.5010 (c). Please amend the title.	
	If the GM allows exemption from SERA.5010 (c) (1) (ground visibility is less than 1500 m) why the same exemption from (c) (2) (ceiling is less than 180 m) is not allowed?	
	SERA.5010 is being replaced and is planned for implementation on 18 August 2016 as part of amendments to 923/2012 (SSC 60 refers). GM appears to apply to the ATS provider, and the rule is contained in paragraph 5010(c).	
	Clarification on alignment of existing AMC/GM with new GM.	
	<u>Suggested resolution:</u> Re-title GM as GM1 SERA.5010(c).	
response	Accepted	
	The GM in discussion will be revised.	
comment	359	comment by: KSAK
	KSAK suport this	
response	Noted	
comment	396	comment by: UK CAA
	<b>age No:</b> 10	
	<b>Paragraph No:</b> GM2 SERA.5010(b)	
	<b>Comment:</b>	
	SERA.5010 is being replaced and is planned for implementation under SERA Part C Phase 1. Existing GM appears to apply to the ATS provider, and the rule is contained in paragraph 5010(c).	
	<b>Justification:</b>	
	Realignment of existing AMC/GM with new GM.	
	<b>Proposed Text:</b>	
	"Re-title GM as GM1 SERA.5010(c)."	
response	Accepted	
	The GM in discussion will be revised.	
comment	430	comment by: Avinor Air Navigation Services (Avinor Flysikring AS)
	Avinor supports the possibility for ATC to excercise the flexibility as proposed in this GM to SERA.5010 (b).	



response Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.7002(a)(1)** p. 10-11  
**Collision hazard information when ATS based on surveillance are provided**

comment 57 comment by: NATS National Air Traffic Services Limited

AMC1 SSRA.7002(a)(1), Page 11

*(A)(2) DISTANCE FROM THE CONFLICTING TRAFFIC IN KILOMETRES (NAUTICAL MILES);*

Although this option is given in parenthesis as per PANS-ATM Chapter 12 style, it is not absolutely clear in this textual context that this is the intention. It would be better to link with an ‘or’.

*Suggest:*

*(2) DISTANCE FROM THE CONFLICTING TRAFFIC IN KILOMETRES OR NAUTICAL MILES ~~KILOMETRES (NAUTICAL MILES);~~*

response Accepted

The text will be amended to read:

‘(2) distance from the conflicting traffic in kilometres or nautical miles;’

comment 58 comment by: NATS National Air Traffic Services Limited

*A)(3) DIRECTION IN WHICH THE CONFLICTING TRAFFIC APPEARS TO BE PROCEEDING; AND*

The AMC would benefit from indications of relative direction i.e. left to right or converging from the left. We suggest for example:

*A)(3) DIRECTION IN WHICH THE CONFLICTING TRAFFIC APPEARS TO BE PROCEEDING E.G. LEFT TO RIGHT OR CONVERGING FROM THE RIGHT; AND*

response Not accepted

Such type of information is available at Appendix I - 2.1.8 and is considered satisfactory to describe the case.

2.1.8	TRAFFIC INFORMATION AND AVOIDING ACTION	a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:
	...(if known)	1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING; 5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type) 9) (level)



...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic	10) [YOUR CLEARED LEVEL] 11) CLIMBING (or DESCENDING)
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comment 59 comment by: NATS National Air Traffic Services Limited  
(B). Use of word “verified”, “unverified”. No definition of what this means. Therefore we would suggest publishing GM on the meaning of verified.

response Not accepted  
When terms used in ICAO are not specifically defined, then the dictionary meaning should be used. In the present case, the text of AMC1 SERA.7002(a)(1) will be modified, and only the cases where the level information cannot be verified will be kept. Therefore it is considered that no additional definition is required.  
The final text of AMC1 SERA.7002(a)(1) will read:  
'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided  
INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:

- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
- (2) distance from the conflicting traffic in kilometres or {nautical miles};
- (3) direction in which the conflicting traffic appears to be proceeding; and
- (4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.

(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. ~~Erroneous level information should not be used in providing collision hazard information. If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.~~

- ~~(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;~~
- ~~(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~
- ~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'~~



comment	<p>60</p> <p>comment by: NATS National Air Traffic Services Limited</p> <p>AMC1 SERA.7002(a)(1),</p> <p><i>B) PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION, EVEN WHEN UNVERIFIED, SHOULD BE USED IN THE PROVISION OF COLLISION HAZARD INFORMATION BECAUSE SUCH INFORMATION, PARTICULARLY IF AVAILABLE FROM AN OTHERWISE UNKNOWN AIRCRAFT (E.G. A VFR FLIGHT) AND GIVEN TO THE PILOT OF A KNOWN AIRCRAFT, COULD FACILITATE THE LOCATION OF A COLLISION HAZARD....</i></p> <p>We note that level information does not indicate location and would suggest instead:</p> <p><i>(B) PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION, EVEN WHEN UNVERIFIED, SHOULD BE USED IN THE PROVISION OF COLLISION HAZARD INFORMATION BECAUSE SUCH INFORMATION, PARTICULARLY IF AVAILABLE FROM AN OTHERWISE UNKNOWN AIRCRAFT (E.G. A VFR FLIGHT) AND GIVEN TO THE PILOT OF A KNOWN AIRCRAFT, COULD FACILITATE THE <b>PROXIMITY</b> LOCATION OF A COLLISION HAZARD.</i></p>
response	<p>Not accepted</p> <p>The dictionary meaning is ‘the action of situating something’ and here it means more precisely to ‘facilitate the visualisation of the hazard by the pilot’. Therefore it is believed that the ICAO text is clearer.</p> <p>The final text of AMC1 SERA.7002(a)(1) will read: ‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <ol style="list-style-type: none"> <li>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</li> <li>(2) distance from the conflicting traffic in kilometres or {nautical miles};</li> <li>(3) direction in which the conflicting traffic appears to be proceeding; and</li> <li>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</li> </ol> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <ol style="list-style-type: none"> <li><del>(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></li> <li><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the</del></li> </ol>



	<p>pilot should be used;</p> <p><del>(3) — If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</del></p>
comment	<p>61 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p>AMC1 SERA.7002(a)(1)</p> <p><i>B)..... ERRONEOUS LEVEL INFORMATION SHOULD NOT BE USED IN PROVIDING COLLISION HAZARD INFORMATION.</i></p> <p>This is not existing PANS-ATM text - we believe this to be an unnecessary addition to PANS-ATM text and adds no value. In order to know if the information is erroneous a controller would have to verify it. This is what (b)(2) suggests. we would therefore suggest removing the second sentence of (b)</p>
response	<p>Accepted</p> <p>The final text of AMC1 SERA.7002(a)(1) will read: ‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <ol style="list-style-type: none"> <li>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</li> <li>(2) distance from the conflicting traffic in kilometres or {nautical miles};</li> <li>(3) direction in which the conflicting traffic appears to be proceeding; and</li> <li>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</li> </ol> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p><del>(1) — When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></p> <p><del>(2) — When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></p> <p><del>(3) — If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</del></p>



comment	<p>62 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p>AMC1 SERA.7002(a)(1)</p> <p><i>(B)(1) WHEN THE PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION HAS BEEN VERIFIED AND IS CORRECT, THE INFORMATION SHOULD BE PASSED TO PILOTS IN A CLEAR AND UNAMBIGUOUS MANNER;</i></p> <p>It is not clear how the level information may be passed and thus we would suggest clarification on how the GM can be applied in RTF exchanges. We would recommend doing this by publishing AMC on RTF to support AMC1.</p> <p>Note that in the UK the phrase “AT” is used to indicate verified level information and the phrase “INDICATING” is used to indicate unverified level information.</p>
response	<p>Partially accepted</p> <p>The sentence at (b)(1) will be removed and the final text of AMC1 SERA.7002(a)(1) will read: ‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <ol style="list-style-type: none"> <li>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</li> <li>(2) distance from the conflicting traffic in kilometres or {nautical miles};</li> <li>(3) direction in which the conflicting traffic appears to be proceeding; and</li> <li>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</li> </ol> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <ol style="list-style-type: none"> <li><del>(1) When the pressure altitude derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></li> <li><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></li> <li><del>(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</del></li> </ol>



comment	<p>63 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>(B)(2) WHEN, SUBSEQUENT TO THE VERIFICATION, IT HAS BEEN ASCERTAINED THAT THE PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION IS ERRONEOUS, SUCH VALUE SHOULD NOT BE USED IN PROVIDING TRAFFIC INFORMATION. IN SUCH CASE, THE LEVEL INFORMATION PROVIDED BY THE PILOT SHOULD BE USED;</i></p> <p>If the level of the unknown traffic is considered erroneous, how does the controller receive this information from the pilot of the unknown traffic if the pilot of the unknown traffic is not communicating with the controller. We would appreciate clarification of this point.</p>
response	<p>Accepted</p> <p>The sentence at (b)(2) will be removed and the final text of AMC1 SERA.7002(a)(1) will read: 'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <ol style="list-style-type: none"> <li>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</li> <li>(2) distance from the conflicting traffic in kilometres or {nautical miles};</li> <li>(3) direction in which the conflicting traffic appears to be proceeding; and</li> <li>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</li> </ol> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p><del>(1) When the pressure altitude derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></p> <p><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></p> <p><del>(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'</del></p>
comment	<p>64 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>(B)(3) IF THE LEVEL INFORMATION HAS NOT BEEN VERIFIED, THE ACCURACY OF THE INFORMATION SHOULD BE CONSIDERED UNCERTAIN AND THE PILOT SHOULD BE INFORMED ACCORDINGLY.</i></p>





	<p>Not clear how the level information may be passed; we would suggest clarification on how the GM can be applied in RTF exchanges, possibly via published AMC on RTF to support AMC1.</p> <p>Note that in the UK the phrase “AT” is used to indicate verified level information and the phrase “INDICATING” is used to indicate unverified level information.</p>
response	<p>Partially accepted</p> <p>The argument that additional GM would help clarifying how the uncertainty of the level information should be transmitted is understood, but the formal need for that and potential added value are not obvious.</p>
comment	<p>181 <span style="float: right;">comment by: CANSO</span></p> <p>1. AMC1 SERA.7002(a)(1)</p> <p>(B).... ERRONEOUS LEVEL INFORMATION SHOULD NOT BE USED IN PROVIDING COLLISION HAZARD INFORMATION.</p> <p>This is not existing PANS-ATM text Unnecessary addition to PANS-ATM text and adds no value. In order to know if the information is erroneous a controller would have to verify it. This is what (b)(2) suggests.</p> <p>Suggestion: Remove second sentence of (b)</p>
response	<p>Accepted</p> <p>The sentence will be removed and the final text of AMC1 SERA.7002(a)(1) will read: ‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p>(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <ol style="list-style-type: none"> <li>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</li> <li>(2) distance from the conflicting traffic in kilometres or {nautical miles};</li> <li>(3) direction in which the conflicting traffic appears to be proceeding; and</li> <li>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</li> </ol> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p><del>(1) When the pressure altitude derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous</del></p>



manner;

~~(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~

~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'~~

comment 297

comment by: ENAV

1. AMC1 SERA.7002(a)(1)

(B)..... ERRONEOUS LEVEL INFORMATION SHOULD NOT BE USED IN PROVIDING COLLISION HAZARD INFORMATION.

This is not existing PANS-ATM text

Unnecessary addition to PANS-ATM text and adds no value. In order to know if the information is erroneous a controller would have to verify it. This is what (b)(2) suggests.

Suggestion: Remove second sentence of (b)

(B)(1) WHEN THE PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION HAS BEEN VERIFIED AND IS CORRECT, THE INFORMATION SHOULD BE PASSED TO PILOTS IN A CLEAR AND UNAMBIGUOUS MANNER;

Not clear how the level information may be passed. Clarification on how the GM can be applied in RTF exchanges. Publish AMC on RTF to support AMC1.

response

Accepted

The sentence will be removed and the final text of AMC1 SERA.7002(a)(1) will read:

'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:

- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
- (2) distance from the conflicting traffic in kilometres or {nautical miles};
- (3) direction in which the conflicting traffic appears to be proceeding; and
- (4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.

(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. ~~Erroneous level information should not be used in providing collision hazard information.~~ If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.



- ~~(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;~~
- ~~(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~
- ~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'~~

comment

351

comment by: Starspeed

The use of Pressure Altitude appears inconsistent with changes to Barometric Altitude elsewhere in NPAs

response

Not accepted

This comment is not understood. There is no occurrence of the term 'barometric altitude' in the NPA.

comment

379

comment by: CANSO

~~(B)(1): WHEN THE PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION HAS BEEN VERIFIED AND IS CORRECT, THE INFORMATION SHOULD BE PASSED TO PILOTS IN A CLEAR AND UNAMBIGUOUS MANNER;~~

Not clear how the level information may be passed. Clarification on how the GM can be applied in RTF exchanges. Publish AMC on RTF to support AMC1.

In the UK the phrase "AT" is used to indicate verified level information and the phrase "INDICATING" is used to indicate unverified level information.

response

Partially accepted

The sentence at (b)(1) will be removed and the final text of AMC1 SERA.7002(a)(1) will read: 'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:

- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
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(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if



available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. ~~Erroneous level information should not be used in providing collision hazard information.~~ If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.

- ~~(1) When the pressure altitude derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;~~
- ~~(2) When, subsequent to the verification, it has been ascertained that the pressure altitude derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~
- ~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'~~

comment

397

comment by: UK CAA

**Page No:** 10-11**Paragraph No:** AMC1 SERA.7002(a)(1)**Comment:**

AMC1 SERA.7002(1)(a) appears to preclude the use of cardinal points for reporting the relative position of conflicting traffic when the traffic receiving service is manoeuvring. An aircraft may be turning when it becomes necessary to pass traffic information on conflicting traffic to it. A turning aircraft cannot use the clock code to understand relative position as one does not know what the actual clock code position would be at any given time.

**Justification:**

The need to facilitate best possible situational awareness when passing traffic information to turning aircraft.

**Proposed Text:**

(a)(1) relative bearing of the conflicting traffic in terms of the 12-hour clock **or, when the aircraft is turning, direction of the unknown aircraft by compass points, e.g., northwest, south, etc.;**

response

Partially accepted

The text will be amended, to read:

'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

- (a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:
- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
- (2) distance from the conflicting traffic in kilometres **or** (nautical miles);



	<p>(3) direction in which the conflicting traffic appears to be proceeding; and</p> <p>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</p> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p><del>(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></p> <p><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></p> <p><del>(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'</del></p> <p><b>GM2 to AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided</b></p> <p>In cases where relative bearing of the conflicting traffic in terms of the 12-hour clock is not practicable, such as when the aircraft is turning, information regarding traffic on a conflicting path may be given by compass points, i.e. northwest, south, etc.</p>
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comment

398

comment by: UK CAA

**Page No:** 11**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (a)(2)**Comment:**

The UK CAA believes that although this option is given in parenthesis as per PANS-ATM Chapter 12 style, it is not absolutely clear in this textual context that this is the intention. It would be better to link with an 'or'.

**Justification:**

Optional means of providing distance information, and of increasing clarity of understanding of presented text.

**Proposed Text:**

"(a)(2) distance from the conflicting traffic in kilometres or nautical miles;"

response

Accepted

The text will be amended to read:

(2) distance from the conflicting traffic in kilometres or {nautical miles};



comment

399

comment by: UK CAA

**Page No:** 11

**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (a)(3)

**Comment:**

The UK CAA believes that guidance regarding the options available to ATS providers is considered necessary in order to empower them to provide the clearest and best possible traffic information in order to facilitate the highest possible degree of situational awareness according to circumstances.

**Justification:**

The UK CAA believes there is a need for pilots and ATS providers to understand, and apply, the best possible means of describing the relative track of aircraft that are the subject of traffic information.

**Proposed Text:**

“GM2 to AMC1 SERA.7002(a)(1), sub-paragraph (a)(3) The direction in which the conflicting traffic appears to be proceeding in relation to the aircraft under service may be presented in terms of crossing left to right (or vice versa), in terms of compass points, or in the opposite direction, e.g. ‘traffic is opposite direction/crossing left to right/or converging from the left/westbound’ etc. and”

response

Not accepted

Such type of information is available at Appendix I - 2.1.8 and is considered satisfactory to describe the case.

2.1.8	TRAFFIC INFORMATION AND AVOIDING ACTION	a) TRAFFIC ( <i>number</i> ) O’CLOCK ( <i>distance</i> ) ( <i>direction of flight</i> ) [ <i>any other pertinent information</i> ]:
	...(if known)	1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING; 5) OPPOSITE ( <i>or</i> SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT ( <i>or</i> RIGHT TO LEFT); 8) ( <i>aircraft type</i> ) 9) ( <i>level</i> )
	...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic	10) [YOUR CLEARED LEVEL] 11) CLIMBING ( <i>or</i> DESCENDING)

comment

400

comment by: UK CAA

**Page No:** 11



**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (b)

**Comment:**

Use of word “verified”, “unverified” – the UK CAA seeks clarification of what these terms mean.

**Justification:**

Clarification.

**Proposed Text:**

“Define both terms.”

response

Not accepted

When terms used in ICAO are not specifically defined, then the dictionary meaning should be used. In the present case, the text of AMC1 SERA.7002(a)(1) will be modified and only the cases where the level information cannot be verified will be kept. Therefore it is considered that no additional definition is required.

The final text of AMC1 SERA.7002(a)(1) will read:

‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

- (a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:
- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
  - (2) distance from the conflicting traffic in kilometres or {nautical miles};
  - (3) direction in which the conflicting traffic appears to be proceeding; and
  - (4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.
- (b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. ~~Erroneous level information should not be used in providing collision hazard information.~~ If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.
- ~~(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;~~
  - ~~(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~
  - ~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.’~~



comment

401

comment by: UK CAA

**Page No:** 11**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (b)**Comment:**

Level information does not indicate location. The UK CAA suggests the final sentence (Erroneous level information should not be used in providing collision hazard information.) appears to be embellishment of source PANS-ATM text and adds no value.

**Justification:**

Use of correct terminology and removal of extraneous text.

**Proposed Text:**

“(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the proximity of a collision hazard.”

response

Partially accepted

The sentence will be removed but for the term ‘location’ the dictionary meaning is ‘the action of situating something’ and here it means more precisely to ‘facilitate the visualisation of the hazard by the pilot’, therefore it is believed that the ICAO text is clearer.

The final text of AMC1 SERA.7002(a)(1) will read:

‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

- (a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:
- (1) relative bearing of the conflicting traffic in terms of the 12-hour clock;
  - (2) distance from the conflicting traffic in kilometres or {nautical miles};
  - (3) direction in which the conflicting traffic appears to be proceeding; and
  - (4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.
- (b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. ~~Erroneous level information should not be used in providing collision hazard information.~~ If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.
- ~~(1) When the pressure altitude derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;~~





- ~~(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;~~
- ~~(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.'~~

comment

402

comment by: UK CAA

**Page No:** 11**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (b)(1)**Comment:**

The UK CAA suggests it is not clear how the level information may be passed. We recommend that GM is published to support AMC1. In the UK the phrase "AT" is used to indicate verified level information and the phrase "INDICATING" is used to indicate unverified level information."

**Justification:**

Clarification.

response

Partially accepted

The argument that additional GM would help clarifying how the uncertainty of the level information should be transmitted is understood, but the formal need for that and potential added value are not obvious.

comment

403

comment by: UK CAA

**Page No:** 11**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (b)(2)**Comment:**

If the level of the unknown traffic is considered erroneous, the UK CAA seeks clarification of how the controller receives this information from the pilot of the unknown traffic if the pilot of the unknown traffic is not communicating with the controller.

**Justification:**

Clarification

response

Accepted

The sentence at (b)(2) will be removed and the final text of AMC1 SERA.7002(a)(1) will read:  
'AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH

- (a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:



	<p>(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</p> <p>(2) distance from the conflicting traffic in kilometres or {nautical miles};</p> <p>(3) direction in which the conflicting traffic appears to be proceeding; and</p> <p>(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</p> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p><del>(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></p> <p><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></p> <p><del>(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</del></p>
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comment

404

comment by: UK CAA

**Page No:** 11**Paragraph No:** AMC1 SERA.7002(a)(1), sub-paragraph (b)(3)**Comment:**

The UK CAA suggests it is not clear how the level information may be passed.

**Justification:**

Clarification.

**Proposed Text:**

“Publish GM to support AMC1. In the UK the phrase “AT” is used to indicate verified level information and the phrase “INDICATING” is used to indicate unverified level information.”

response

Partially accepted

The argument that additional GM would help clarifying how the uncertainty of the level information should be transmitted is understood, but the formal need for that and potential added value are not obvious.

comment

460

comment by: European Cockpit Association



response	Theses proposed AMC/GM are expressly supported.
comment	506 <span style="float: right;">comment by: ENAC Italy</span>
response	<p>Remove second sentence of (b)</p> <p>Justification: This is not existing PANS-ATM text. Unnecessary addition to PANS-ATM text and adds no value. In order to know if the information is erroneous a controller would have to verify it.</p> <p>This is what (b)(2) suggests.</p> <p>Accepted</p> <p>The sentence will be removed and the final content of AMC1 SERA.7002(a)(1) will read: ‘AMC1 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided</p> <p>INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH</p> <p style="padding-left: 40px;">(a) Information regarding traffic on a conflicting path should be given, whenever practicable, in the following form:</p> <p style="padding-left: 80px;">(1) relative bearing of the conflicting traffic in terms of the 12-hour clock;</p> <p style="padding-left: 80px;">(2) distance from the conflicting traffic in kilometres or {nautical miles};</p> <p style="padding-left: 80px;">(3) direction in which the conflicting traffic appears to be proceeding; and</p> <p style="padding-left: 80px;">(4) level and type of aircraft or, if unknown, relative speed of the conflicting traffic, e.g. slow or fast.</p> <p>(b) Pressure-altitude-derived level information, even when unverified, should be used in the provision of collision hazard information because such information, particularly if available from an otherwise unknown aircraft (e.g. a VFR flight) and given to the pilot of a known aircraft, could facilitate the location of a collision hazard. <del>Erroneous level information should not be used in providing collision hazard information.</del> If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.</p> <p style="padding-left: 40px;"><del>(1) When the pressure-altitude-derived level information has been verified and is correct, the information should be passed to pilots in a clear and unambiguous manner;</del></p> <p style="padding-left: 40px;"><del>(2) When, subsequent to the verification, it has been ascertained that the pressure-altitude-derived level information is erroneous, such value should not be used in providing traffic information. In such case, the level information provided by the pilot should be used;</del></p> <p style="padding-left: 40px;"><del>(3) If the level information has not been verified, the accuracy of the information should be considered uncertain and the pilot should be informed accordingly.’</del></p>
comment	507 <span style="float: right;">comment by: ENAC Italy</span>



(B)(1): WHEN THE PRESSURE-ALTITUDE-DERIVED LEVEL INFORMATION HAS BEEN VERIFIED AND IS CORRECT, THE INFORMATION SHOULD BE PASSED TO PILOTS IN A CLEAR AND UNAMBIGUOUS MANNER;

Not clear how the level information may be passed, but clarification on how the GM can be applied in RTF exchanges should be published in a suitable AMC on RTF to support AMC1.

Note: in Europe one ANSP uses the phrase “AT” to indicate verified level information and the phrase “INDICATING” is used to indicate unverified level information.

response Partially accepted  
The argument that additional GM would help clarifying how the uncertainty of the level information should be transmitted is understood, but the formal need for that and potential added value are not obvious.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 to AMC1** p. 11  
**SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

comment 149 comment by: René Meier, Europe Air Sports  
Page 11/77  
GM2 SERA.7002(a)(1)  
Collision hazard information...  
Please change this sentence from this passive to an active form. e.g. "...ATS should inform the pilot..." instead of "...the pilot should be informed..."  
Rationale:  
Our proposal is more direct and easier to understand.

response Not accepted  
On the basis of the transposition principles, the wording is maintained as close as possible to the ICAO text to avoid confusion on the final intention.

comment 462 comment by: European Cockpit Association  
Theses proposed AMC/GM are expressly supported.  
response Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.7002(a)(1)** p. 11  
**Collision hazard information when ATS based on surveillance are provided**

comment 65 comment by: NATS National Air Traffic Services Limited  
GM2 & GM3 & GM4 & GM5 SERA.7002(a)(1), Page 11 & 12  
We note there is no GM1 to SERA.7002(a)(1) and suggest this is a possible typographical error; perhaps should be GM2 to **AMC 1** SERA.7002(a)(1) etc.



response	<p>Partially accepted</p> <p>There was a GM1 to AMC1 SERA.7002(a)(1) which was correct, and the other GMs are to SERA.7002(a)(1) itself. Therefore, they will re-numbered into GM1-GM2-GM3-GM4 to SERA.7002(a)(1).</p>
comment	<p>66 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>WHEN AN IDENTIFIED IFR FLIGHT OPERATING OUTSIDE CONTROLLED AIRSPACE IS OBSERVED TO BE ON A CONFLICTING PATH WITH ANOTHER AIRCRAFT, THE PILOT SHOULD:</i></p> <p><i>We note that as per 7002(a), the conflicting traffic needs to constitute a collision hazard before avoiding action advice is given. We would suggest that the text is rewritten as:</i></p> <p><i>WHEN AN IDENTIFIED IFR FLIGHT OPERATING OUTSIDE CONTROLLED AIRSPACE IS OBSERVED TO BE ON A CONFLICTING PATH WITH ANOTHER AIRCRAFT DEEMED TO CONSTITUTE A COLLISION HAZARD, THE PILOT SHOULD:</i></p>
response	<p>Not accepted</p> <p>This provision is GM complementing the provisions associated to SERA.7002, which defines the context and the scope. Point a) of this GM will be amended in accordance with the responses to comments 67 and 407.</p>
comment	<p>67 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>(A) BE INFORMED AS TO THE NEED FOR COLLISION AVOIDANCE ACTION TO BE INITIATED, AND IF SO REQUESTED BY THE PILOT OR IF, IN THE OPINION OF THE CONTROLLER, THE SITUATION WARRANTS, A COURSE OF AVOIDING ACTION SHOULD BE SUGGESTED; AND</i></p> <p>ATC would not advise a pilot to of the need for avoiding action. This is either considered necessary by the controller and supplied, or is requested by the pilot after traffic information has been provided.</p> <p>Suggest this should be rewritten as:</p> <p><i>(A) BE INFORMED <b>OF THE TRAFFIC</b> <del>AS TO THE NEED FOR COLLISION AVOIDANCE ACTION TO BE INITIATED,</del> AND IF SO REQUESTED BY THE PILOT OR IF, IN THE OPINION OF THE CONTROLLER, THE SITUATION WARRANTS, A COURSE OF AVOIDING ACTION SHOULD BE SUGGESTED; AND</i></p>
response	<p>Accepted</p> <p>The text will be amended to read:</p> <p><b>GM1</b> SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH OUTSIDE CONTROLLED AIRSPACE</p> <p>When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should:</p> <p>(a) be informed of the traffic as to the need for collision avoidance action to be initiated, and if so requested by the pilot or if, in the opinion of the controller, the situation warrants, a course of avoiding action should be suggested; and</p>



(b) be notified when the conflict no longer exists.

comment	348	comment by: René Meier, Europe Air Sports
	<p>page 11/77 GM2 SERA.7002(a)(1) We propose to re-phrase a little bit the first sentence: "...with another aircraft, the ATCO on duty (a) informs the flight crew of the aircraft.... and (b) notifies the flight crew when the conflict no longer exist."</p> <p>Rationale: Our wording in its active form fits better with such a situation than the proposed passive approach to the situation.</p>	
response	<p>Not accepted On the basis of the transposition principles, the wording is maintained as close as possible to the ICAO text to avoid confusion on the final intention.</p>	

comment	368	comment by: CAA-NL
	<p><b>AMC1 SERA.7002(a)(1)</b> Since this is AMC material the word 'should' is used also where PANS ATM uses the word 'shall'. However this leads to odd sentences, like the sentence under (b) : "information should be passed to pilots in a clear and unambiguous manner"</p>	
response	<p>Not accepted In accordance with the European rule drafting convention, the word 'shall' is used in implementing rules for binding provisions. In the case of AMC/GM, the European rule drafting convention is to use 'should'.</p>	

comment	405	comment by: UK CAA
	<p><b>Page No:</b> 11 <b>Paragraph No:</b> GM2 SERA.7002(a)(1) <b>Comment:</b> The UK CAA suggests this should be GM2 to AMC 1 SERA.7002(a)(1) etc. <b>Justification:</b> Correct potential typographical error. <b>Proposed Text:</b> Rename paragraph.</p>	
response	<p>Partially accepted There was a GM1 to AMC1 SERA.7002(a)(1) which was correct, and the other GMs are to SERA.7002(a)(1) itself. Therefore, they will re-numbered into GM1-GM2-GM3-GM4 to SERA.7002(a)(1).</p>	



comment	<p>406 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> GM2 SERA.7002(a)(1)</p> <p><b>Comment:</b> As with SERA 7002(a) itself, the UK CAA suggests that the conflicting traffic needs to constitute a collision hazard before avoiding action advice is given.</p> <p><b>Justification:</b> Clarity of guidance and consistency with IR text.</p> <p><b>Proposed Text:</b> “When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft <b>deemed to constitute a collision hazard</b>, the pilot should:”</p>
response	<p>Not accepted</p> <p>This provision is GM complementing the provisions associated to SERA.7002, which defines the context and the scope. Point a) of this GM will be amended in accordance with the responses to comments 67 and 407.</p>
comment	<p>407 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 11</p> <p><b>Paragraph No:</b> GM2 SERA.7002(a)(1)(a)</p> <p><b>Comment:</b> The UK CAA suggests that ATC would not advise a pilot of the need for avoiding action. This is either considered necessary by the controller and supplied, or is requested by the pilot after traffic information has been provided.</p> <p><b>Justification:</b> Clarity of guidance and consistency with IR text.</p> <p><b>Proposed Text:</b> “a) be informed of the traffic and if so requested by the pilot or if, in the opinion of the controller, the situation warrants, a course of avoiding action should be suggested; and”</p>
response	<p>Accepted</p> <p>The text will be amended to read: <b>GM1</b> SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided INFORMATION REGARDING TRAFFIC ON CONFLICTING PATH OUTSIDE CONTROLLED AIRSPACE When an identified IFR flight operating outside controlled airspace is observed to be on a conflicting path with another aircraft, the pilot should: (a) be informed of the traffic <del>as to the need for collision avoidance action to be initiated</del>, and</p>



if so requested by the pilot or if, in the opinion of the controller, the situation warrants, a course of avoiding action should be suggested; and  
(b) be notified when the conflict no longer exists.

comment	463	comment by: <i>European Cockpit Association</i>
	Theses proposed AMC/GM are expressly supported.	
response	Noted	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM3 SERA.7002(a)(1)  
Collision hazard information when ATS based on surveillance are provided**

p. 12

comment	140	comment by: <i>René Meier, Europe Air Sports</i>
	Page 12/77 GM3 SERA.7002(a)(1) Collision hazard information Please change to: ‘When available, the information presented by a situation display shall be used to provide ...’  Rationale: Unless there are some legal considerations behind the words, the use of ‘may’ is not satisfactory because in most of classes of airspace the information must be used.	
response	Not accepted  In accordance with the European rule drafting convention, the word ‘shall’ is used in implementing rules for binding provisions.	

comment	464	comment by: <i>European Cockpit Association</i>
	Theses proposed AMC/GM are expressly supported.	
response	Noted	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM4 SERA.7002(a)(1)  
Collision hazard information when ATS based on surveillance are provided**

p. 12

comment	68	comment by: <i>NATS National Air Traffic Services Limited</i>
	<b>THE PROVISION OF TRAFFIC ADVICE DOES NOT ABSOLVE PILOTS OF VFR FLIGHTS OF THEIR RESPONSIBILITIES FOR AVOIDING TERRAIN/OBSTACLES AND FOR MAINTAINING VMC.</b>  This should also include any collision avoidance advice; we would suggest:	





	<p>THE PROVISION OF TRAFFIC <del>ADVICE</del> <b>AND/OR COLLISION AVOIDANCE ADVICE</b> DOES NOT ABSOLVE PILOTS OF VFR FLIGHTS OF THEIR RESPONSIBILITIES FOR AVOIDING TERRAIN/OBSTACLES AND FOR MAINTAINING VMC.</p>	
response	<p>Partially accepted The term 'traffic advice' will be replaced by 'collision hazard information'.</p>	
comment	98	comment by: NSA Austria
	<p>Traffic advice is no ATS provision. The traffic INFORMATION has in its name, that it is solely meant to inform pilots of relevant traffic. That EXCLUDES information of terrain or obstacles (built on terrain) IF a pilots elects to fly VFR or IFR in IMC....</p>	
response	<p>Partially accepted The term 'traffic advice' will be replaced by 'collision hazard information'.</p>	
comment	141	comment by: René Meier, Europe Air Sports
	<p>Page 12/77 GM4 SERA.7002(a)(1) Collision hazard Until now, the verb used in such a sentence is 'to exempt pilots from avoiding ...'.  Proposal: Please write '... does not absolve pilots of VFR flights from their responsibilities for avoiding...'  Rationale: According to some grammars, the verb 'to absolve pilots from' is more appropriate than the verb 'to absolve pilots of' in the present case.</p>	
response	<p>Accepted</p>	
comment	177	comment by: CANSO
	<p><b>GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided</b>  Instead of the use of traffic advise we suggest to use either "suggestion", "information" or "advice regarding avoiding action" according to ICAO Doc 4444 (8.11.1) or the headline "Collision hazard information". The term "traffic advice" is not defined and risks to be mixed up with "air traffic advisory service". e.g.: GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided The provision of <b>traffic information and suggestion of advice regarding avoiding action</b> does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.</p>	
response	<p>Partially accepted</p>	



The term 'traffic advice' will be replaced by 'collision hazard information'.

comment

298

comment by: ENAV

**GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

Instead of the use of traffic advise we suggest to use either "suggestion", "information" or "advice regarding avoiding action" according to ICAO Doc 4444 (8.11.1) or the headline "Collision hazard information". The term "traffic advice" is not defined and risks to be mixed up with "air traffic advisory service".

e.g.: GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

The provision of **traffic information and suggestion of advice regarding avoiding action** does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.

response

Partially accepted

The term 'traffic advice' will be replaced by 'collision hazard information'.

comment

324

comment by: DFS Deutsche Flugsicherung GmbH

GM 4 and 5 use the term "traffic advice". We suggest to use either "suggestion" or "advice regarding avoiding action" according to ICAO Doc 4444 (8.11.1) or to the headline "Collision hazard information". The term "traffic advice" is not defined and risks to be mixed up with "air traffic advisory service".

**e.g.: GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided**

The provision of traffic information and suggestion of advice regarding avoiding action does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.

response

Partially accepted

The term 'traffic advice' will be replaced by 'collision hazard information'.

comment

377

comment by: HungaroControl

Instead of the term traffic advice we suggest to use either collision hazard information as used in the headline or avoiding action as used in the text of SERA.7002. (a).

Suggsted text:

The provision of ~~traffic advice~~ collision hazard information or avoidance action does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.

response

Partially accepted

The term 'traffic advice' will be replaced by 'collision hazard information'.

comment

408

comment by: UK CAA



**Page No:** 12**Paragraph No:** GM4 SERA.7002(a)(1)**Comment:**

The UK CAA recommends that this text should also include any collision avoidance advice.

**Justification:**

Address anomalous text.

**Proposed Text:**“The provision of traffic **and/or collision avoidance** advice does not absolve pilots of VFR flights of their responsibilities for avoiding terrain/obstacles and for maintaining VMC.”

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’.

comment

465

comment by: *European Cockpit Association*

Theses proposed AMC/GM are expressly supported.

response

Noted

comment

508

comment by: *ENAC Italy*

Instead of the use of traffic advise we suggest to use either "suggestion", "information" or "advice regarding avoiding action" according to ICAO Doc 4444 (8.11.1) or the headline "Collision hazard information".

e.g.: GM4 SERA.7002(a)(1) Collision hazard information when ATS based on surveillance are provided

Justification: The term “traffic advice” is not defined and risks to be mixed up with “air traffic advisory service”.

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM5 SERA.7002(a)(1)  
Collision hazard information when ATS based on surveillance are provided**

p. 12

comment

378

comment by: *HungaroControl*

What is the intended meaning behind ‘traffic advice’ and who is responsible for the provision of it? ‘Traffic information’ seems to be more appropriate here. In Class F traffic advisory is ambiguous and possible to be mixed up with traffic advisory service.

response

Partially accepted

The term ‘traffic advice’ will be replaced by ‘collision hazard information’.



comment	459	comment by: <i>European Cockpit Association</i>
	Theses proposed AMC/GM are expressly supported.	
response	Noted	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.8015(a) Air traffic control clearances**

p. 12

comment	69	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p><i>CLEARANCES TO VFR FLIGHTS IN AIRSPACE CLASS C AND D DO NOT IMPLY ANY FORM OF SEPARATION:</i></p> <p><i>(A) IN CLASS C – BETWEEN VFR FLIGHTS; AND</i></p> <p><i>(B) IN CLASS D – BETWEEN IFR AND VFR FLIGHTS OR BETWEEN VFR FLIGHTS.</i></p> <p>A SVFR flight is a VFR flight operating under less than VMC. Unless otherwise authorised by the competent authority, ATC separate SVFR flights. As written this GM can be interpreted to mean ATC do not separate SVFR flights. We would suggest:</p> <p><i>EXCEPT WHEN OPERATING AS A SVFR FLIGHT, CLEARANCES TO VFR FLIGHTS IN AIRSPACE CLASS C AND D DO NOT IMPLY ANY FORM OF SEPARATION:</i></p> <p><i>(A) IN CLASS C – BETWEEN VFR FLIGHTS; AND</i></p> <p><i>(B) IN CLASS D – BETWEEN IFR AND VFR FLIGHTS OR BETWEEN VFR FLIGHTS.</i></p>	
response	<p>Partially accepted</p> <p>It is agreed that this GM may be improved and become more comprehensive by adding the following, to read:</p> <p><b>GM1 SERA.8015(a) Air traffic control clearances</b></p> <p>Clearances to VFR flights in airspace Classes C and D do not imply any form of separation:</p> <p>(a) in Class C — between VFR flights; and</p> <p>(b) in Class D — between IFR and VFR flights or between VFR flights.</p> <p>For the case of SVFR flights, refer to SERA.8005(b).</p>	

comment	109	comment by: <i>Bruno Herencic</i>
	<p>In some member states, ATS providers have the practice of delegating large portions of Class C and Class D airspace to FIS units in order for ATC not to work with VFR traffic. (lower workload or other considerations). One such state is Croatia.</p> <p>These FIS units are not allowed to issue clearances and they typically respond to Altitude/Level Requests with "Altitude 4500 feet approved".</p> <p>This can lead to a great deal of confusion as to what type of service is provided and what airspace the pilot is in. In order to harmonise such practices across the community and ensure adequate level of safety, we propose to add the following text to GM SERA.8015(a):</p>	



response "VFR traffic flying in controlled airspace is to receive the service as specified for that airspace, including air traffic control clearances. Air Traffic Control Clearances are to be transmitted to VFR traffic flying in Controlled Airspace by the ATC and not by the FIS".

Not accepted

The delivery of clearances is to be compliant with the airspace classification and with the regulations applicable for ANS provision. The AMC/GM are not designed to solve issues of erroneous implementation of applicable regulations. It is to be noted that in airspace Classes C and D, VFR flights are subject to ATC clearance even if separation is not always provided.

comment 142 comment by: *René Meier, Europe Air Sports*

Page 12/77  
GM1 SERA.8015(a)

ATC clearances

It is understood that in Classes D and C VFR flights are not separated from each other by ATC. Nevertheless, pilots are given by ATC traffic information on other VFR flights allowing pilots to establish and maintain a visual separation with conflicting and/or preceding traffic.

Proposal:  
Please write:  
"Clearances to VFR flights in Class D and C airspaces should facilitate the establishment of visual separation by the pilots:..."

Rationale:  
The wording of this provision you propose is ambiguous.

response Not accepted

comment 300 comment by: *ENAV*

GM1 SERA.8015(a) Air traffic control clearances

Redundant information, already regulated in SERA IR. This GM does not add any guidance.

response Noted

### 3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.8015(e)(1) Air traffic control clearances

p. 12

comment 99 comment by: *NSA Austria*

SERA 8015 (e) 1 refers to REQUESTED changes in route or level. It is not clear why at all an ATCO shall emphasize on the nature of the requested change.  
A (re-)routing clearance up to the destination is in most cases simply not possible!!

response Not accepted

In cases when a direct routing is not available, a description of the complete routing should



be mentioned.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.8015(g) Air traffic control clearances**

p. 13

comment	143	comment by: René Meier, Europe Air Sports
	<p>Page 13/77 GM1 SERA.8015(g) ATC clearances Please change the type of aircraft from DC-9 to e.g. Airbus 320!</p> <p>Rationale: Your document should reflect most recent technology, we think. And please to this throughout the entire document.</p>	
response	<p>Not accepted</p> <p>The Agency’s intention is to maintain consistency with ICAO.</p>	

comment	202	comment by: EM-LPS
	<p><i>Proposed modification of the example:</i> “SCANDINAVIAN 941, BEHIND DC9 ON SHORT FINAL, LINE UP <b>RUNWAY XX</b> BEHIND”</p>	
response	<p>Not accepted</p> <p>Due to lack of assessment (risk of excessive frequency occupation, risk of confusion, etc.), this proposal deviating from ICAO cannot be accepted without further evaluation. Additionally, this type of conditional clearance should be delivered only to an aircraft unambiguously identified at the proper holding point and ready to line up.</p>	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.8025(a)(2) Position reports**

p. 13

comment	70	comment by: NATS National Air Traffic Services Limited
	<p>We note there is no SERA.8025(a)(2), this is possibly a typo. Perhaps should be GM1 SERA.8025(b)?</p>	
response	<p>Noted</p> <p>The provision was introduced by SERA Part C.</p>	
comment	301	comment by: ENAV
	<p>GM1 SERA.8025(a)(2) Position reports</p> <p>There is not any point under SERA.8025 (a) (2), please amend the title to GM1 SERA.8025 (b).</p>	



response Not accepted  
The provision was introduced by SERA Part C.

comment 325 comment by: *DFS Deutsche Flugsicherung GmbH*  
This GM seems to rather belong to SERA.8025 (b) (2) instead of (a) (2). Wrong reference

response Not accepted  
The provision was introduced by SERA Part C.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC2 SERA.8035  
Communications**

p. 13

comment 183 comment by: *CANSO*  
Unlucky re-phrase instead of copying Doc 4444:  
“**Except when** a CPDLC emergency message is received **and that** the controller must acknowledge by the most efficient means available, **when** a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.”  
We suggest to keep the logic of Doc 4444  
14.3.1.3 and 14.3.5.1:  
(1) When a CPDLC emergency message is received, the controller shall acknowledge receipt of the message by the most efficient means available.  
(2) Except as provided by (1), when a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.

response Accepted  
The text will be amended accordingly.

comment 302 comment by: *ENAV*  
Unlucky re-phrase instead of copying Doc 4444:  
“**Except when** a CPDLC emergency message is received **and that** the controller must acknowledge by the most efficient means available, **when** a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.”  
We suggest to keep the logic of Doc 4444  
14.3.1.3 and 14.3.5.1:  
(1) When a CPDLC emergency message is received, the controller shall acknowledge receipt of the message by the most efficient means available.  
(2) Except as provided by (1), when a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.



response Accepted  
The text will be amended accordingly.

comment 326 comment by: *DFS Deutsche Flugsicherung GmbH*  
Unlucky re-phrase instead of copying Doc 4444:  
“**Except when** a CPDLC emergency message is received **and that** the controller must acknowledge by the most efficient means available, **when** a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.”  
?????  
We suggest to keep the logic of Doc 4444  
14.3.1.3 and 14.3.5.1:  
(1) When a CPDLC emergency message is received, the controller shall acknowledge receipt of the message by the most efficient means available.  
(2) Except as provided by (1), when a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.

response Accepted  
The text will be amended accordingly.

comment 509 comment by: *ENAC Italy*  
The text of Doc. 4444 should be used for transposition of Doc 4444  
14.3.1.3 and 14.3.5.1:  
(1) When a CPDLC emergency message is received, the controller shall acknowledge receipt of the message by the most efficient means available.  
(2) Except as provided by (1), when a controller or pilot communicates via CPDLC, the response should be via CPDLC. When a controller or pilot communicates via voice, the response should be via voice.

Justification: more clear, no potential for misunderstanding...

response Accepted  
The text will be amended accordingly.

### 3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.10001(c) Application

p. 14

comment 71 comment by: *NATS National Air Traffic Services Limited*  
*THE ‘OPERATIONS NORMAL’ MESSAGE IS NORMALLY DIRECTED TO THE AERONAUTICAL TELECOMMUNICATION STATION SERVING THE ATS UNIT IN CHARGE OF THE FIR IN WHICH THE AIRCRAFT IS FLYING; OTHERWISE TO ANOTHER AERONAUTICAL TELECOMMUNICATION STATION TO BE RETRANSMITTED AS REQUIRED TO THE ATS UNIT IN CHARGE OF THE FIR.*  
  
This is not clear. What does “*AERONAUTICAL TELECOMMUNICATION STATION SERVING THE*





	<i>ATS UNIT IN CHARGE OF THE FIR IN WHICH THE AIRCRAFT IS FLYING”</i> mean in practice; we would appreciate clarification?	
response	Accepted It is recognised that this GM, directly transposed from PANS ATM 9.2.1.3 does not add clarity and does not reflect the European airspace situation and it will be removed.	
comment	409	comment by: UK CAA
	<b>Page No:</b> 14	
	<b>Paragraph No:</b> GM1 SERA.10001(c) ‘Application’	
	<b>Comment:</b> The UK CAA suggests that it is not clear what ‘the aeronautical telecommunication station serving the ATS unit in charge of the FIR in which the aircraft is flying’ means in practice. We would welcome clarification.	
	<b>Justification:</b> Clarification.	
response	Accepted It is recognised that this GM, directly transposed from PANS ATM 9.2.1.3 does not add clarity and does not reflect the European airspace situation and it will be removed.	

<b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.11001 General</b>	p. 14-15
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comment	72	comment by: NATS National Air Traffic Services Limited
	<p><i>A) WHEN AN AIRCRAFT OPERATED AS A CONTROLLED FLIGHT EXPERIENCES SUDDEN DECOMPRESSION OR A MALFUNCTION REQUIRING AN EMERGENCY DESCENT, THE AIRCRAFT SHOULD, IF ABLE:</i></p> <p><i>(1) INITIATE A TURN AWAY FROM THE ASSIGNED ROUTE OR TRACK BEFORE COMMENCING THE EMERGENCY DESCENT;</i></p> <p>Turning away from the track may be appropriate for en-route flight along bi-directional airways but in busy TMAs where closely spaced parallel tracks and radar vectors are predominantly part of the airspace design and CONOPS, turning away may bring the aircraft into conflict with other aircraft. Consideration should be given that turning away from the track may not be advisable in busy TMA airspace.</p> <p>We would suggest <i>(1) INITIATE A TURN AWAY FROM THE ASSIGNED ROUTE OR TRACK BEFORE COMMENCING THE EMERGENCY DESCENT. CONSIDERATION SHOULD BE GIVEN TO REMAINING ON ROUTE OR TRACK IN BUSY AIRSPACE IF AWARE OF AIRCRAFT IN CLOSE PROXIMITY.</i></p>	
response	Not accepted This provision is transposed from ICAO Doc 7030 – 9.1 and is derived from the IFALPA policy. Any modification should therefore consider these documents and be coordinated with the pilots’ community.	



comment	<p>412 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 14</p> <p><b>Paragraph No:</b> GM1 SERA.11001(a)(1) 'General'</p> <p><b>Comment:</b> Turning away from the track may be appropriate for en-route flight along bi-directional airways but in busy TMAs where closely spaced parallel tracks and radar vectors are predominantly part of the airspace design and CONOPS, the UK CAA suggests that turning away may bring the aircraft into conflict with other aircraft. Consideration should be given that turning away from the track may not be advisable in busy TMA airspace.</p> <p><b>Justification:</b> Potential unintended adverse safety consequences</p> <p><b>Proposed Text:</b> “(1) initiate a turn away from the assigned route or track before commencing the emergency descent. <b>Consideration should be given to remaining on track in aware of aircraft in close proximity;</b>”</p>
response	<p>Not accepted</p> <p>This provision is transposed from ICAO Doc 7030 – 9.1 and is derived from the IFALPA policy. Any modification should therefore consider these documents and be coordinated with the pilots' community.</p>
comment	<p>495 <span style="float: right;">comment by: Swedish Transport Agency</span></p> <p>It is important that there is a standard procedure in such a situation. For that reason, EASA should consider changing the GM to an AMC.</p> <p>Sweden wants also to draw attention on the importance of using a consistent vocabulary: Please note the wording of AMC2 SERA.11005 "the following procedures are intended as <b>guidance</b>"...". Furthermore, for transparency reasons, it is also important that EASA is clear what considerations made in connection with the preparation of draft text.</p>
response	<p>Partially accepted</p> <p>AMC2 SERA.11005 will be changed to GM.</p>

### 3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.11005 Unlawful interference

p. 15-16

comment	<p>20 <span style="float: right;">comment by: ATCEUC - Air Traffic Controllers European Unions Coordination</span></p> <p>It should be considered the possibility to have a dedicated frequency for the aircraft in distress, depending on feasibility and if it is advisable or not to do so.</p> <p><b>AMC1 SERA.11005 Unlawful interference</b> (...)</p>
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	<p>ATS Units should also: (...) <u>(6) allocate, whenever deemed possible and advisable, a dedicated frequency,</u></p>
response	<p>Not accepted The frequency 121.5 MHz is already reserved and available for such cases. While the suggested option is not excluded by the proposed provision, it is left to the decision of ANSPs and competent authorities when establishing contingency plans and instructions.</p>
comment	<p>34 <span style="float: right;">comment by: ENAIRE</span></p> <p>In page 15 (AMC1 SERA.11005 unlawful interference), an additional paragraph should establish that ATS units shall provide, where it is possible, with a dedicated frequency.</p>
response	<p>Not accepted The frequency 121.5 MHz is already reserved and available for such cases. While the suggested option is not excluded by the proposed provision, it is left to the decision of ANSPs and competent authorities when establishing contingency plans and instructions.</p>
comment	<p>73 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p>OF THATS UNITS SHOULD ALSO:</p> <p>(1) TRANSMIT, AND CONTINUE TO TRANSMIT INFORMATION PERTINENT TO THE SAFE CONDUCT OF THE FLIGHT, WITHOUT EXPECTING A REPLY FROM THE AIRCRAFT</p> <p>There could be more guidance here on ATC actions that may cause a negative impact on the flight deck i.e. ATC transmissions that draw attention to the fact that there is unlawful interference. This problem is suggested by proposed GM1 SERA.13005(a) which addresses provides a protocol for selecting and confirming A7500.</p>
response	<p>Accepted</p> <p>The following GM is proposed to illustrate such case:</p> <p><b>GM1 to AMC1 SERA.11005(a)(1) Unlawful interference</b></p> <p>Verbal reference to unlawful interference should not be made by the controller unless it is first made by the pilot in a radio communication transmission, since it might attract the attention of the hijacker (or of other aircraft) and have detrimental consequences.</p>
comment	<p>118 <span style="float: right;">comment by: Malta Air Traffic Controllers' Association</span></p> <p>According to disponibility and feasability, ANSPs should consider providing a dedicated frequency for aircraft in distress.</p>
response	<p>Not accepted The frequency 121.5 MHz is already reserved and available for such cases. While the suggested option is not excluded by the proposed provision, it is left to the decision of ANSPs and competent authorities when establishing contingency plans and instructions.</p>
comment	<p>218 <span style="float: right;">comment by: AESA / DSANA</span></p>



COMMENT	JUSTIFICATION
In "AMC1 SERA.11005 Unlawful interference" <b>PANS-ATM 15.1.3.3</b> should be added as a source reference for (a).	"AMC1 SERA.11005 Unlawful interference" includes <b>PANS-ATM 15.1.3.4</b> as the source for such requirements; however, this is the case for <b>AMC1 SERA.11005 (b)</b> , but <b>(a)</b> is derived from <b>PANS-ATM 15.1.3.3</b> .
response	Accepted

comment	413	comment by: UK CAA
	<p><b>Page No:</b> 15</p> <p><b>Paragraph No:</b> AMC1 SERA.11005(a)(1) 'Unlawful interference'</p> <p><b>Comment:</b> The UK CAA suggests consideration should be given to developing guidance to enhance awareness of the possibility of ATS actions causing a negative impact on the flight deck e.g. RT transmissions that draw unnecessary attention to the fact that an unlawful interference has occurred."</p> <p><b>Justification:</b> Comprehensive guidance.</p>	
response	<p>Accepted</p> <p>The following GM is proposed to illustrate such case: <b>GM1 to AMC1 SERA.11005(a)(1) Unlawful interference</b> Verbal reference to unlawful interference should not be made by the controller unless it is first made by the pilot in a radio communication transmission, since it might attract the attention of the hijacker (or of other aircraft) and have detrimental consequences.</p>	

<b>3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC2 SERA.11005 Unlawful interference</b>	p. 16-17
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comment	21	comment by: ATCEUC - Air Traffic Controllers European Unions Coordination
	This provision should be considered GM. Even the first sentence specifies that the procedures listed are just as "guidance".	
response	<p>Accepted</p> <p>AMC2 SERA.11005 will be changed to GM.</p>	
comment	35	comment by: ENAIRE
	In page 16 (AMC2 SERA.11005 Unlawful interference), procedures are defined as "guidance"	



	so this clause should be included as Guidance Material and not as Acceptable Means of Compliance.				
response	Accepted AMC2 SERA.11005 will be changed to GM.				
comment	119 <span style="float: right;">comment by: <i>Malta Air Traffic Controllers' Association</i></span> This provision should be Guidance Material as listed in first line				
response	Accepted AMC2 SERA.11005 will be changed to GM.				
comment	203 <span style="float: right;">comment by: <i>EM-LPS</i></span> (3) if no applicable regional procedures have been established, or the pilot-in-command is unable to apply any other procedures, proceed at a level which differs from the cruising levels normally used for IFR flight by:				
response	Not accepted				
comment	219 <span style="float: right;">comment by: <i>AESA / DSANA</i></span>				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>In "AMC2 SERA.11005 Unlawful interference" Annex number is missing; the reference should be Annex 2, Attachment B.</td> <td>In "AMC2 SERA.11005 Unlawful interference" reference reads "Annex, Attachment B" instead of "Annex 2, Attachment B".</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	In "AMC2 SERA.11005 Unlawful interference" Annex number is missing; the reference should be Annex 2, Attachment B.	In "AMC2 SERA.11005 Unlawful interference" reference reads "Annex, Attachment B" instead of "Annex 2, Attachment B".
COMMENT	JUSTIFICATION				
In "AMC2 SERA.11005 Unlawful interference" Annex number is missing; the reference should be Annex 2, Attachment B.	In "AMC2 SERA.11005 Unlawful interference" reference reads "Annex, Attachment B" instead of "Annex 2, Attachment B".				
response	Accepted The AMC in discussion will be amended.				
comment	466 <span style="float: right;">comment by: <i>European Cockpit Association</i></span> This AMC is expressly supported, refer to the response to 'Issue 1'.				
response	Noted				

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.11012 Minimum fuel and fuel emergency** p. 17



comment	22	comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i>
	<p>This declaration does not entitle the aircraft to receive priority so the GM should be clear enough.</p> <p><b>GM1 SERA.11012 Minimum fuel and fuel emergency</b>  <i>"The declaration of MINIMUM FUEL informs ATC that all planned aerodrome options have been reduced to a specific aerodrome of intended landing, and any change to the existing clearance may result in landing with less than planned final reserve fuel. This is not an emergency situation but an indication that an emergency situation is possible should any additional delay occur. <u>Pilots should not expect any form of priority handling as a result of a "Minimum Fuel" declaration</u>"</i></p>	
response	<p>Not accepted  The GM is considered sufficient to cover this specific situation, in line with widely accepted ICAO wording.</p>	
comment	41	comment by: <i>ENAIRE</i>
	<p>GM1 SERA.11012 Minimum fuel and fuel emergency: A more detailed treatment of a "minimum fuel" situation is lacking, above all, within the context in which more than one aircraft would be experiencing the same problem, in a presumably complicated environment (adverse weather, accident/incident at airport of destination, industrial action).</p>	
response	<p>Noted  The comment is understood but developing new material beyond the existing ICAO provisions was not the initial mandate for this task and would require more time and resources to perform consultation and reach consensus.</p>	
comment	120	comment by: <i>Malta Air Traffic Controllers' Association</i>
	<p>It should be clearly stated that a minimum fuel declaration by PIC is not MAYDAY or PANPAN and therefore NO priority should be provided by ATC unless an emergency is declared</p>	
response	<p>Not accepted  The GM is considered sufficient to cover this specific situation, in line with widely accepted ICAO wording.</p>	
comment	144	comment by: <i>René Meier, Europe Air Sports</i>
	<p>Page 17/77  GM1 SERA.11012  Minimum fuel and fuel emergency  Please change the title.</p> <p>Rationale:  The paragraph deals with minimum fuel, final reserve, but not with a fuel emergency.</p>	
response	<p>Not accepted  The title of AMC/GM is that of the IR provision they are associated with. In this case, the title</p>	



of SERA.11012 (introduced by PART C) is 'Minimum fuel and fuel emergency'.

comment	467	comment by: <i>European Cockpit Association</i>
	This GM is expressly supported.	
response	Noted.	

comment	498	comment by: <i>Swedish Transport Agency</i>
	It is important that there is a standard procedure in such a situation. For that reason, EASA should consider changing the GM to an AMC.	
response	Not accepted The wording of the transposed provision constitutes information and does not correspond to that of an AMC. See also the responses to comments Nos 72 and 412 showing the need for flexibility depending on different situations.	

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.11013(b)  
Degraded aircraft performance**

p. 17-18

comment	74	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p><i>(D) SUBSEQUENT ATC ACTION IN RESPECT OF AN AIRCRAFT THAT CANNOT MEET THE SPECIFIED REQUIREMENTS DUE TO A FAILURE OR DEGRADATION OF THE RNAV SYSTEM, WILL BE DEPENDENT UPON THE NATURE OF THE REPORTED FAILURE AND THE OVERALL TRAFFIC SITUATION. CONTINUED OPERATION IN ACCORDANCE WITH THE CURRENT ATC CLEARANCE MAY BE POSSIBLE IN MANY SITUATIONS. WHEN THIS CANNOT BE ACHIEVED, A REVISED CLEARANCE MAY BE REQUIRED TO REVERT TO VOR/DME NAVIGATION.</i></p> <p>ATC could also give radar vectors so we would suggest:</p> <p><i>Suggest:</i> <i>(D) SUBSEQUENT ATC ACTION IN RESPECT OF AN AIRCRAFT THAT CANNOT MEET THE SPECIFIED REQUIREMENTS DUE TO A FAILURE OR DEGRADATION OF THE RNAV SYSTEM, WILL BE DEPENDENT UPON THE NATURE OF THE REPORTED FAILURE AND THE OVERALL TRAFFIC SITUATION. CONTINUED OPERATION IN ACCORDANCE WITH THE CURRENT ATC CLEARANCE MAY BE POSSIBLE IN MANY SITUATIONS. WHEN THIS CANNOT BE ACHIEVED, A REVISED CLEARANCE MAY BE REQUIRED TO REVERT TO VOR/DME NAVIGATION OR TO ACCEPT RADAR VECTORS.</i></p>	
response	Not accepted Radar vectors are covered in the same GM.	
comment	150	comment by: <i>René Meier, Europe Air Sports</i>
	Page 17/77 GM1 SERA.11013(b)	



	<p>Degraded aircraft performance We hear of ANSP's discussing dismantling VOR/DME in a very near future.</p> <p>Question: What procedure will in place then?</p>
response	<p>Noted The applicable procedures will be adapted in due time, when so required.</p>
comment	<p>414 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 18</p> <p><b>Paragraph No:</b> GM1 SERA.11013(b)(d) 'Degraded aircraft performance'</p> <p><b>Comment:</b> In addition to reverting to own navigation, the UK CAA suggests that ATC could also provide radar vectors to affected aircraft.</p> <p><b>Justification:</b> Widening options and completeness of GM.</p> <p><b>Proposed Text:</b> “(d) Subsequent ATC action in respect of an aircraft that cannot meet the specified requirements due to a failure or degradation of the RNAV system will be dependent upon the nature of the reported failure and the overall traffic situation. Continued operation in accordance with the current ATC clearance may be possible in many situations. When this cannot be achieved, a revised clearance may be required to revert to VOR/DME navigation. <b>Alternatively, radar vectors may be provided.</b>”</p>
response	<p>Noted Radar vectors are covered in the same GM.</p>

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.11014 ACAS resolution advisory (RA)**

p. 18

comment	<p>75 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p>SERA.11014 is planned for implementation on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.</p> <p>The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.</p> <p>Clarification is requested with regards to the above point.</p>
response	<p>Noted The publication of the AMC/GM is expected in the course of Q4 of 2016.</p>





comment	76 comment by: <i>NATS National Air Traffic Services Limited</i> GM1 SERA.11014  <i>THE ACAS CAPABILITY OF AN AIRCRAFT MAY NOT BE KNOWN TO AIR TRAFFIC CONTROLLERS AND ACAS CAN HAVE A SIGNIFICANT EFFECT ON ATC. THEREFORE, THE PERFORMANCE OF ACAS IN THE ATC ENVIRONMENT SHOULD BE MONITORED.</i>  These two sentences are an amalgamation of PANS-ATM 15.7.3.5 and Note to 15.7.3.6. In PANS they address two different issues but combined here they can be interpreted to mean that ATC i.e. the controller, is responsible for monitoring the performance of the ACAS system. In practice this is system engineering function.  The second sentence is already a European requirement under ESSIP/LSSIP and is not necessary.  We believe that misinterpretation can place unrealistic responsibility on controllers and so would suggest deleting the whole GM as it just declares a simple fact that ATC do not necessarily know the aircraft's ACAS capability. It adds little value to SERA.11014.
response	Accepted The GM will be removed.
comment	100 comment by: <i>NSA Austria</i>  How is that “monitoring” of the performance of ACAS systems in ATM environment supposed to be done/achieved ???
response	Accepted The GM will be removed.
comment	121 comment by: <i>Malta Air Traffic Controllers' Association</i>  EASA should clearly instruct ATC that no action has to attempted and PIC is to follow exactly the RA instructions
response	Not accepted  This is covered by point (d) of SERA.11014 (introduced by SERA Part C).
comment	184 comment by: <i>CANSO</i>  GM1 SERA.11014 ACAS resolution advisory (RA)  The ACAS capability of an aircraft may not be known to air traffic controllers and ACAS can have a significant effect on ATC. Therefore, the performance of ACAS in the ATC environment should be monitored.  PANS-ATM AND 15.7.3.5 15.7.3.6 is taken here otherwise which also modifies the content. We would suggest to take over as it stands in ICAO.
response	Accepted



See response to comment No 76.

comment	<p>303</p> <p>GM1 SERA.11014 ACAS resolution advisory (RA)</p> <p>The ACAS capability of an aircraft may not be known to air traffic controllers and ACAS can have a significant effect on ATC. Therefore, the performance of ACAS in the ATC environment should be monitored.</p> <p>PANS-ATM AND 15.7.3.5 15.7.3.6 is taken here otherwise which also modifies the content. We would suggest to take over as it stands in ICAO.</p>	comment by: ENAV
response	<p>Accepted</p> <p>See response to comment No 76. The GM will be removed.</p>	

comment	<p>415</p> <p><b>Page No:</b> 18</p> <p><b>Paragraph No:</b> GM1 SERA.11014 ACAS resolution advisory (RA)</p> <p><b>Comment:</b> The UK CAA seeks clarification as to how and/or by whom the performance of ACAS is to be monitored within the ATC environment. The UK CAA believes that the text is an amalgamation of PANS-ATM 15.7.3.5 and Note to 15.7.3.6. In PANS they address two different issues but combined here they can be interpreted to mean that ATC is responsible for monitoring the performance of the ACAS system. In practice this is system engineering function. EUROCONTROL ACAS monitoring is performed by function Voluntary ATM Incident Reporting (EVAIR) scheme. ACAS data has been collected by means of manual reporting (incident reports from airlines and ANSPs and automated reporting via the Automated Safety Monitoring Tool. The data is also automatically collected from a number of Mode S radars. The UK CAA seeks clarification as to whether SERA Part C's text (IR/AMC/GM) foresees (or generates) any changes to this arrangement.</p> <p><b>Justification:</b> Clarification.</p>	comment by: UK CAA
response	<p>Accepted</p> <p>The GM will be removed.</p>	

comment	<p>468</p> <p>The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.</p>	comment by: European Cockpit Association
response	<p>Accepted</p>	



A consolidated version will be developed.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.11014 ACAS resolution advisory (RA)**

p. 18

comment 23 comment by: *ATCEUC - Air Traffic Controllers European Unions Coordination*

This chapter may lead to confusion, since it is included as GM to a provision related to RA which clearly states the course of action that the pilots should follow, i.e., follow RA instructions. What is intended here is already clearly stated in SERA.11014 (a)(1):

*“In the event of an RA, pilots shall:  
(1) respond immediately by following the RA as indicated, unless doing so would jeopardise the safety of the aeroplane;”*

response Not accepted

This is important for the sake of completeness. It is also consistent with ICAO.

comment 36 comment by: *ENAIRE*

In page 18 (GM2 SERA.11014 ACAS Resolution Advisory (RA)), redaction might cause confusion given the fact that by virtue of SERA.11014(a)(1) there is an obligation to immediately respond to a RA. It could then be interpreted as allowing pilots to be entitled to avoid conflicts based on a traffic advisory (TA). Hence this clause should be clarified. Pilot is always responsible for the aircraft safety, but ¿what is the matter with TAs? We have seen there is a tendency for pilots to deactivate conflicts based on TAs and this sometimes creates more problems.

response Not accepted

This is important for the sake of completeness. It is also consistent with ICAO.

comment 220 comment by: *AESA / DSANA*

COMMENT	JUSTIFICATION
Source reference in "GM2 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3</b> ".	Source reference in "GM2 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3</b> ".

response Accepted

The source reference will be amended.



comment	<p data-bbox="360 241 411 271">416</p> <p data-bbox="1219 241 1477 271" style="text-align: right;">comment by: <i>UK CAA</i></p> <p data-bbox="360 300 584 329"><b>Page No:</b> 18</p> <p data-bbox="360 369 1126 398"><b>Paragraph No:</b> GM2 SERA.11014 ACAS resolution advisory (RA)</p> <p data-bbox="360 443 491 472"><b>Comment:</b> The proposed text states that ‘Nothing in the procedures specified in SERA.11014 should prevent pilots-in-command from exercising their best judgement and full authority in the choice of the best course of action to resolve a traffic conflict or avert a potential collision’. Source text at ICAO Doc 8168 (PANS-OPS) Vol I, Part III, Section 3, Chapter3, 3.1.3 states that ‘nothing in the procedures specified....<b>shall</b> prevent pilots-in-command from exercising their best judgement and full authority in the choice of the best course of action to resolve a traffic conflict or avert a potential collision’. The UK CAA suggests it is an important principle regarding the use of ACAS and should be afforded IR status within SERA.</p> <p data-bbox="360 801 520 831"><b>Justification:</b> Anomaly between ICAO and SERA content requires clarification as to why text was determined to be AMC not IR.</p>
response	<p data-bbox="360 934 523 963">Not accepted</p> <p data-bbox="360 987 874 1016">In this case, it supports the provision itself.</p> <p data-bbox="360 1043 1477 1115">AMC and GM do not contain legislative provisions and therefore cannot use any language that expresses an obligation (‘shall’). Given their ‘soft law’ nature, only ‘should’ is to be used.</p>
comment	<p data-bbox="360 1211 411 1240">469</p> <p data-bbox="959 1211 1477 1240" style="text-align: right;">comment by: <i>European Cockpit Association</i></p> <p data-bbox="360 1263 1477 1397">The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.</p>
response	<p data-bbox="360 1462 475 1491">Accepted</p> <p data-bbox="360 1518 858 1547">A consolidated version will be developed.</p>
comment	<p data-bbox="360 1637 411 1666">511</p> <p data-bbox="1187 1637 1477 1666" style="text-align: right;">comment by: <i>ENAC Italy</i></p> <p data-bbox="360 1688 1477 1800">Delete the paragraph, because it is in sheer contrast with the entire ACAS philosophy. The ACAS concept of operation is that the pilot MUST comply with RAs and the requirements in SERA.11014 as the best course of action.</p> <p data-bbox="360 1832 1318 1861">Justification: to avoid any accident due to the pilot not conforming to ACAS RAs.</p>
response	<p data-bbox="360 1897 523 1926">Not accepted</p> <p data-bbox="360 1951 1038 1980">This is an important provision and fully in line with ICAO.</p>



**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM3 SERA.11014 ACAS resolution advisory (RA)** p. 19

comment	221	comment by: AESA / DSANA				
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="width: 50%;">COMMENT</th> <th style="width: 50%;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b>".</td> <td>Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3, Note 1" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b>".</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b> ".	Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3, Note 1" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b> ".
COMMENT	JUSTIFICATION					
Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b> ".	Source reference in "GM3 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3, Note 1" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.1.3, Note 1</b> ".					
response	<p>Accepted</p> <p>The source reference will be amended.</p>					

comment	470	comment by: European Cockpit Association
	<p>The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.</p>	
response	<p>Accepted</p> <p>A consolidated version will be developed.</p>	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM4 SERA.11014 ACAS resolution advisory (RA)** p. 19

comment	77	comment by: NATS National Air Traffic Services Limited
	<p>GM4 SERA.11014</p> <p><i>PILOTS SHOULD NOT MANOEUVRE THEIR AIRCRAFT IN RESPONSE TO TRAFFIC ADVISORIES (TAs) ONLY.</i></p> <p>This is a ‘shall’ in PANS-OPS (Vol I, Part III, Section 3, Chapter3, 3.2(a)). It is an important operating principle in the ACAS environment and should have the same status in SERA.</p> <p>This is an anomaly between ICAO and SERA rule and we would recommend promoting the rule to IR Annex material.</p>	



response Not accepted

In this case it supports the provision itself.

In accordance with the European rule drafting convention, the word ‘shall’ is used in implementing rules for binding provisions.

In the case of AMC/GM, the European rule drafting convention is to use ‘should’.

comment 222 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
Source reference in "GM4 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2 a)</b> ".	Source reference in "GM4 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2 a)</b> ".

response Accepted

The source reference will be amended.

comment 471 comment by: European Cockpit Association

The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.

response Accepted

A consolidated version will be developed.

comment 510 comment by: ENAC Italy

First of all we notice that the ICAO standard "Pilots SHALL not manoeuvre their aircraft in response to traffic advisories (TAs) only" has been softened into guidance material. Having said this it is of critical importance to remind in the same paragraph that TAs only do not authorise the pilot to depart from the applicable Air Traffic Service clearance.

Justification: Extreme clarity on a very critical item.

response Noted

The provision will be considered to be upgraded as an IR at a later stage.

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM5 SERA.11014 ACAS resolution advisory (RA)**

p. 19

comment 101 comment by: NSA Austria

What sense does it make to put a **Note of PANS OPS** into a GM covering possible misinterpretations in the scope of visual perception of pilots....

response Not accepted

This GM is introduced because during the standardisation inspections, a great number of immediate safety hazards findings were issued following erroneous guidance to pilots contained in the operators' operation manuals.

comment 223 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
Source reference in "GM5 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2 a), Note 1</b> ".	Source reference in "GM5 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2 a), Note 1</b> ".

response Accepted

The source reference will be amended.

comment 472 comment by: European Cockpit Association

The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.

response Accepted

A consolidated version will be developed.

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM6 SERA.11014 ACAS resolution advisory (RA)**

p. 19

comment 224 comment by: AESA / DSANA



	COMMENT	JUSTIFICATION
	Source reference in "GM6 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 3), Note</b> ".	Source reference in "GM6 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 3), Note</b> ".
response	Accepted The source reference will be amended.	
comment	473	comment by: <i>European Cockpit Association</i>
	The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.	
response	Accepted A consolidated version will be developed.	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM7 SERA.11014 ACAS resolution advisory (RA)** p. 19

comment	225	comment by: <i>AESA / DSANA</i>				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b>".</td> <td>Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b>".</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b> ".	Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b> ".	
COMMENT	JUSTIFICATION					
Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b> ".	Source reference in "GM7 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.2, c) 4), Note</b> ".					
response	Accepted The source reference will be amended.					
comment	474	comment by: <i>European Cockpit Association</i>				
	The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as					





	GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.
response	Accepted A consolidated version will be developed.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM8 SERA.11014 ACAS resolution advisory (RA)** p. 19

comment	78 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span> GM8 SERA.11014  <i>PILOTS SHOULD USE APPROPRIATE PROCEDURES BY WHICH AN AEROPLANE CLIMBING OR DESCENDING TO AN ASSIGNED ALTITUDE OR FLIGHT LEVEL MAY DO SO AT A RATE LESS THAN 8 M/S (OR 1 500 FT/MIN) THROUGHOUT THE LAST 300 M (OR 1 000 FT) OF CLIMB OR DESCENT TO THE ASSIGNED ALTITUDE OR FLIGHT LEVEL WHEN THE PILOT IS MADE AWARE OF ANOTHER AIRCRAFT AT OR APPROACHING AN ADJACENT ALTITUDE OR FLIGHT LEVEL, UNLESS OTHERWISE INSTRUCTED BY ATC. THESE PROCEDURES ARE INTENDED TO AVOID UNNECESSARY ACAS II RESOLUTION ADVISORIES IN AIRCRAFT AT OR APPROACHING ADJACENT ALTITUDES OR FLIGHT LEVELS. FOR COMMERCIAL OPERATIONS, THESE PROCEDURES SHOULD BE SPECIFIED BY THE OPERATOR.</i>  PANS-OPS recommends this practice so consideration should be given to making this AMC and not GM
response	Not accepted A more detailed assessment would be needed before changing it to an AMC.

comment	226 <span style="float: right;">comment by: AESA / DSANA</span>				
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #d9e1f2;">COMMENT</th> <th style="background-color: #d9e1f2;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b>".</td> <td>Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b>".</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b> ".	Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b> ".
COMMENT	JUSTIFICATION				
Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b> ".	Source reference in "GM8 SERA.11014 ACAS resolution advisory (RA)" is "PANS-OPS, Vol I, Chapter 3, 3.1.3" and it should be clearer: "PANS-OPS, Vol I, <b>Part III, Section 3, Chapter 3, 3.3</b> ".				
response	Accepted The source reference will be amended.				



comment	475	comment by: <i>European Cockpit Association</i>
	The transposition of the ICAO PANS-OPS ACAS provisions (CR SERA.11014) with the Notes as GM is expressly supported. It should be noted that a way needs to be found to make available to the end user a consolidated document that includes hard and soft law in direct connection for clarity.	
response	Accepted A consolidated version will be developed.	

### 3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM2 SERA.11015 Interception

p. 20-24

comment	24	comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i>
	The reference to Appendix 1, Section 2 should be verified because the information is on table S11-1.	
response	Accepted The reference will be amended.	
comment	79	comment by: <i>NATS National Air Traffic Services Limited</i>
	GM2 applies to whole of 11015. SERA.11015 is planned for amendment on 26 May 2016 as part of amendments to 923/2012 (SSC 57 refers). Publication of Decision on AMC/GM stated as Q2 2016.  The Decision period encompasses the 923/2012 amendment date so potentially it could be after the amendment date. AMC/GM must be available at the same time as the binding material becomes effective.	
response	Noted The publication of the AMC/GM is expected in the course of Q4 of 2016.	
comment	80	comment by: <i>NATS National Air Traffic Services Limited</i>
	2.4.2 IT IS INDISPENSABLE THAT THE PILOT-IN-COMMAND OF THE INTERCEPTING AIRCRAFT BE SATISFIED THAT THE PILOT-IN-COMMAND OF THE INTERCEPTED AIRCRAFT IS AWARE OF THE INTERCEPTION AND ACKNOWLEDGES THE SIGNALS GIVEN. IF REPEATED ATTEMPTS TO ATTRACT THE ATTENTION OF THE PILOT-IN-COMMAND OF THE INTERCEPTED AIRCRAFT BY USE OF THE SERIES 1 SIGNAL IN APPENDIX 1, SECTION 2, ARE UNSUCCESSFUL, OTHER METHODS OF SIGNALLING MAY BE USED FOR THIS PURPOSE, INCLUDING AS A LAST RESORT THE VISUAL EFFECT OF THE REHEAT/AFTERBURNER, PROVIDED THAT NO HAZARD IS CREATED FOR THE INTERCEPTED AIRCRAFT.  What is the intention of the word "indispensable". Within the procedure, its context suggests	



	that the pilot shall carry out the action. If it is important it should not be GM.
response	<p>Noted</p> <p>The use of the word ‘indispensable’ reinforces the importance of an element of the text; however, this does not modify the general status of that section which is guidance, like the source material (ICAO Annex 2, Attachment A).</p>
comment	<p>81 <span style="float: right;">comment by: <i>NATS National Air Traffic Services Limited</i></span></p> <p><b>GM2 SERA.11015, <i>AIR-TO-AIR VISUAL SIGNALS</i></b></p> <p><i>THE VISUAL SIGNALS TO BE USED BY INTERCEPTING AND INTERCEPTED AIRCRAFT ARE THOSE SET FORTH IN TABLES S11-1 AND S11-2. IT IS ESSENTIAL THAT INTERCEPTING AND INTERCEPTED AIRCRAFT ADHERE STRICTLY TO THOSE SIGNALS AND INTERPRET CORRECTLY THE SIGNALS GIVEN BY THE OTHER AIRCRAFT, AND THAT THE INTERCEPTING AIRCRAFT PAY PARTICULAR ATTENTION TO ANY SIGNALS GIVEN BY THE INTERCEPTED AIRCRAFT TO INDICATE THAT IT IS IN A STATE OF DISTRESS OR URGENCY.</i></p> <p>Use of phrase “adhere strictly” suggests that this is a shall. Therefore it is not suitable for GM.</p>
response	<p>Not accepted</p> <p>This phrase reflects and does not contradict the content of SERA.11015(b)(1). The rest of the text is additional guidance to it.</p>
comment	<p>102 <span style="float: right;">comment by: <i>NSA Austria</i></span></p> <p>Interception methods are subject to OAT(=operational air traffic) and there is no reason to believe that the armed forces will stick to any of the recommendations or GM.</p> <p><b>SERA does not apply to OAT but only GAT.</b></p> <p>5.1. offers the question if the intercept control unit and the intercepting aircraft are allowed use a <b>civil emergency frequency</b>, especially once the interceptor uses the emergency frequency to establish contact with the intercepted aircraft.</p> <p>7. offers the question if an intercept control is an ATS unit and therefore allowed to <b>COORDINATE</b> with an ATS unit</p>
response	<p>Not accepted</p> <p>This guidance applies also to flight crews of a civilian aircraft. It is a direct transposition of an ICAO recommendation.</p>
comment	<p>122 <span style="float: right;">comment by: <i>Malta Air Traffic Controllers' Association</i></span></p> <p>The reference to Append 1, Sec 2 should be verified because the information is on table S11-1</p>
response	<p>Accepted</p>



The reference will be amended.

comment	151	comment by: René Meier, Europe Air Sports
	Page GM2 SERA.11015 Interception 3.3 (d)	23/77
	The proposed wording as regards minimum of runway length should be changed to "...adequate to the type of transport aircraft intercepted..."	
	Rationale: 2500 m are sufficient for most of the types, we think, but many can do with much less considering the wide range used in the air transport world.	
response	Not accepted	

comment	417	comment by: UK CAA
	<b>Page No:</b> 20	
	<b>Paragraph No:</b> GM2 SERA.11015 Interception para 1.1	
	<b>Comment:</b> The UK CAA believes that the statement 'Practice interception of civil aircraft is not to be undertaken' is too restrictive.	
	<b>Justification:</b> Interception training is required to ensure that Member States are capable of undertaking such activities when called upon to do so.	
	<b>Proposed Text:</b> "Practice interception of civil aircraft is not to be undertaken <b>unless prior agreement has been reached to conduct such activity with the pilot and or operator of the civil aircraft concerned.</b> "	
response	Not accepted This is already covered by the existing AMC1 SERA.11015(a). It is ultimately up to the PIC to decide.	

comment	418	comment by: UK CAA
	<b>Page No:</b> 22	
	<b>Paragraph No:</b> GM2 SERA.11015 Interception para 2.4.2	
	<b>Comment:</b> The UK CAA suggest that the purpose and intent of the word "indispensable" is unclear in this context. It can be read as meaning that the pilot <b>shall</b> carry out the action, in which case the UK CAA recommends that the text is more properly IR or, at the very least, AMC.	



	<p><b>Justification:</b> Clarification.</p>
response	<p>Noted</p> <p>The use of the word ‘indispensable’ reinforces the importance of an element of the text; however, this does not modify the general status of that section which is guidance, like the source material (ICAO Annex 2, Attachment A).</p>
comment	<p>419 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 23</p> <p><b>Paragraph No:</b> GM2 SERA.11015 Interception para 4</p> <p><b>Comment:</b> Use of phrase “adhere strictly” suggests that the pilot <b>shall</b> carry out the action, in which case the UK CAA recommends that the text is more properly IR, and is therefore not appropriate for it to be cast as GM.</p> <p><b>Justification:</b> Elevation of text to I</p>
response	<p>Not accepted</p> <p>This phrase reflects and does not contradict the content of SERA.11015(b)(1). The rest of the text is additional guidance to it.</p>
comment	<p>476 <span style="float: right;">comment by: European Cockpit Association</span></p> <p>The transposition of ICAO Annex 2 Attachment A is expressly supported.</p> <p>However, as SERA.11015 and the reference ICAO provisions call for ‘appropriate regulations and administrative directives’ (sic) to govern interception of civil aircraft, soft law in form of GM appears to constitute a very weak solution. While recognising, that early in the rule making process an attempt to transpose the reference material into hard law has failed, consideration should be given to elevate the proposed text, or possibly appropriate parts of it, to AMC.</p>
response	<p>Not accepted</p> <p>This is a direct transposition of an ICAO recommendation.</p>

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.12020 Exchange of air-reports**

p. 24

comment	<p>420 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 24</p>
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**Paragraph No:** AMC1 SERA.12020 Exchange of air-reports

**Comment:**

The UK CAA suggests that it is not clear who is responsible for passing these forecasts. ATC do not verbally pass forecasts up to 60 mins flying time from the aerodrome. ATIS broadcasts may not be able to be received 60 mins flying time from the aerodrome. It is recommended that the text is amended to clarify which agency is responsible for passing the subject forecasts

**Justification:**

Clarification.

response

Not accepted

AMC1 concerns 'special air-reports'. In other words, ATC will not verbally pass forecasts but only information on specific phenomena such as volcanic eruption, etc. Additionally, SERA.12020(a) is clearly placing the responsibility on the ATS units having received special and non-routine air-reports.

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC2 SERA.12020 Exchange of air-reports**

p. 24

comment

82

comment by: *NATS National Air Traffic Services Limited*

*AMENDED AERODROME FORECASTS SHOULD BE PASSED TO AIRCRAFT WITHIN 60 MINUTES FROM THE AERODROME OF DESTINATION UNLESS THE INFORMATION HAS BEEN MADE AVAILABLE THROUGH OTHER MEANS.*

It is not clear who is responsible for passing these forecasts. ATC do not verbally pass forecasts up to 60 mins flying time from the aerodrome. ATIS broadcasts may not be able to be received 60 mins flying time from the aerodrome.

response

Accepted

SERA.12020 is about 'special air reports' and the present AMC about 'aerodrome forecast'. AMC2 SERA.12020 will be merged with GM1 SERA.9005(b)(1) to become:  
Pilots normally obtain information on the weather conditions from the appropriate office before the flight. When available, outstanding or safety relevant information is normally provided by radio communication when available within 60 minutes from the aerodrome of destination unless the information has been made available through other means.

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.13001 Operation of SSR transponder**

p. 24

comment

83

comment by: *NATS National Air Traffic Services Limited*

*PILOTS OF AIRCRAFT ENGAGED IN FORMATION JOIN-UPS ARE EXPECTED TO CONTINUE OPERATING THE TRANSPONDER UNTIL ESTABLISHED IN FORMATION. ONCE ESTABLISHED IN FORMATION, ALL EXCEPT THE LEAD AIRCRAFT WILL BE INSTRUCTED TO 'SQUAWK STANDBY'.*



GM must not contain instructions and therefore we would suggest:

*PILOTS OF AIRCRAFT ENGAGED IN FORMATION JOIN-UPS ARE EXPECTED TO CONTINUE OPERATING THE TRANSPONDER UNTIL ESTABLISHED IN FORMATION. ONCE ESTABLISHED IN FORMATION, ALL EXCEPT THE LEAD AIRCRAFT ~~WILL~~ SHOULD BE INSTRUCTED TO ‘SQUAWK STANDBY’.*

response Accepted  
The text will be amended accordingly.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.13001(c)  
Operation of SSR transponder**

p. 25

comment 84 comment by: NATS National Air Traffic Services Limited  
*WHEN ABLE TO DO SO, PILOTS OF NON-POWERED AIRCRAFT ARE ENCOURAGED TO OPERATE THE TRANSPONDER DURING FLIGHT ALSO OUTSIDE AIRSPACE WHERE CARRIAGE AND OPERATION OF SSR TRANSPONDER IS MANDATORY.*

This text could read better and therefore we would suggest:

*WHEN ABLE TO DO SO, PILOTS OF NON-POWERED AIRCRAFT ARE ~~ALSO~~ ENCOURAGED TO OPERATE THE TRANSPONDER DURING FLIGHT ~~ALSO~~ OUTSIDE AIRSPACE WHERE CARRIAGE AND OPERATION OF ~~A~~ SSR TRANSPONDER IS MANDATORY.*

response Not accepted  
This would change slightly the meaning when being read out of context.

comment 421 comment by: UK CAA

**Page No:** 25

**Paragraph No:** GM1 SERA.13001(c) Operation of SSR transponder

**Comment:**

The UK CAA suggests that the current text could be improved slightly.

**Justification:**

Clarity.

**Proposed Text:**

“Pilots of non-powered aircraft are also encouraged to operate the transponder during flight outside airspace where carriage and operation of SSR transponder is mandatory.”

response Not accepted

comment 478 comment by: European Cockpit Association



Unfortunately, we were unable to locate the current (proposed) reference SERA.13001. The draft CR to Opinion 04-2014 - (23) A new Section 13 has been introduced - starts with SERA.13005.  
In any case, the intention of the proposed GM is supported.

response

Noted

The provision exists in the final version of the proposed rule.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.13005(a) SSR transponder Mode A code setting**

p. 25

comment

205

comment by: *EM-LPS*

*Comments in italics*

*Due to sensitivity of this situation an example phrase or recommended best practices would be appreciated. Wrong formulated question can lead to suspicion and make the situation even worse.*

response

Not accepted

The specificity of such situation makes it difficult to provide examples or best practices. See also response to comment No 413.

comment

479

comment by: *European Cockpit Association*

Transposition supported

response

Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.13005(c) SSR transponder Mode A code setting**

p. 25

comment

480

comment by: *European Cockpit Association*

Transposition supported

response

Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.13010(b) Pressure-altitude-derived information**

p. 25-26

comment

85

comment by: *NATS National Air Traffic Services Limited*





GM1 SERA.13010(b)

*B) IF, FOLLOWING CONFIRMATION OF THE CORRECT PRESSURE SETTING THE DISCREPANCY CONTINUES TO EXIST, THE FOLLOWING ACTION SHOULD BE TAKEN BY ATC ACCORDING TO CIRCUMSTANCES:*

*A common operational solution to incorrect level information is to ask the pilot to switch to an alternative change transponder before asking the pilot to stop Mode C transmissions. We believe that this GM doesn't reflect common practice and thus would suggest:*

*(1) REQUEST THE PILOT TO SWITCH TO AN ALTERNATIVE TRANSPONDER*

*(2) IF THE AIRCAFAT DOES NOT HAVE AN ALTERNATIVE TRANSPONDER OR IF THE ALTERNATIVE TRANSPONDER CONTINUES TO DISPLAY THE DISCREPANCY, REQUEST THE PILOT TO STOP MODE C .....*

*Existing paragraph (2) re-numbered as (3).*

response

Not accepted

This is more a pilot action and is usually included in abnormal procedures.

comment

422

comment by: UK CAA

**Page No:** 25

**Paragraph No:** GM1 SERA.13010(b), sub-paragraph (b) Pressure-altitude-derived information

**Comment:**

'A common operational solution to incorrect level information is to ask the pilot to switch to an alternative transponder before asking the pilot to stop Mode C transmissions.'

**Justification:**

Completeness of guidance based upon operational experience and practice.

**Proposed Text:**

(1) request the pilot to select and operate an alternative transponder.

(2) If the aircraft is not equipped with an alternative transponder or the alternative transponder also displays the discrepancy, request the pilot to stop Mode C or ADS-B altitude data transmission, provided this does not cause the loss of position and identity information, and notify the next control positions or ATC unit concerned with the aircraft of the action taken; or

(3) inform the pilot of the discrepancy..... etc."

response

Not accepted

This is more a pilot action and is usually included in abnormal procedures.

comment

481

comment by: European Cockpit Association



	Transposition supported
response	Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.13020(a) SSR transponder failure when the carriage of a functioning transponder is mandatory** p. 26

comment	227	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.13020(a) SSR transponder failure when the carriage of a functioning transponder is mandatory": replace (PANS-ATM 8.8.3.3.) reference by (PANS-ATM 8.8.3.3.1).</td> <td>The complete reference is (PANS-ATM 8.8.3.3.1) instead of (PANS-ATM 8.8.3.3.).</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.13020(a) SSR transponder failure when the carriage of a functioning transponder is mandatory": replace (PANS-ATM 8.8.3.3.) reference by (PANS-ATM 8.8.3.3.1).	The complete reference is (PANS-ATM 8.8.3.3.1) instead of (PANS-ATM 8.8.3.3.).	
COMMENT	JUSTIFICATION					
"GM1 SERA.13020(a) SSR transponder failure when the carriage of a functioning transponder is mandatory": replace (PANS-ATM 8.8.3.3.) reference by (PANS-ATM 8.8.3.3.1).	The complete reference is (PANS-ATM 8.8.3.3.1) instead of (PANS-ATM 8.8.3.3.).					
response	<p>Accepted</p> <p>The reference will be amended.</p>					

comment	482	comment by: European Cockpit Association
	Transposition supported	
response	Noted	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.13020(b) SSR transponder failure when the carriage of a functioning transponder is mandatory** p. 26

comment	483	comment by: European Cockpit Association
	Transposition supported	
response	Noted	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.14001 General** p. 26

comment	252	comment by: AESA / DSANA
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COMMENT	JUSTIFICATION
<p><b>SERA.14085 (a)</b> is not fully harmonized with <b>ICAO Annex 10, Volume II provisions 5.2.2.7.1.1 and 5.2.2.7.1.2</b>, from which we understand the wording of <b>SERA.14085 (a)</b> comes from.</p> <p>In particular, the following phrase from <b>ICAO Annex 10, Volume II</b> has been omitted in SERA Part C draft current version: <i>“In addition, an aircraft operating within a network shall monitor the appropriate VHF channel for calls from nearby aircraft.”</i></p> <p>(In fact, this sentence did appear in the initial proposal in the NPA and, after several changes, it has disappeared without any justification, as far as we know).</p> <p>If that phrase is omitted, we would like to know whether there is a need to file a notification to ICAO of a difference on that provision as that provision has neither been included in the SERA Part C regulation nor in the supplement to the SERA regulation Annex.</p>	<p><b>ICAO Annex 10, Volume II provision 5.2.2.7.1.1</b> includes the sentence <i>“In addition, an aircraft operating within a network shall monitor the appropriate VHF channel for calls from nearby aircraft.”</i>, which has been omitted in <b>SERA.14085 (a)</b>.</p>

response

Not accepted  
On the basis of comments received to the NPA 2014-05 ‘SERA Part C’, it has been accepted to keep in SERA.14085 only the material which is unlikely to be changed as a result of the ongoing ICAO works on the subject. This section should in any case be reviewed when a decision is made regarding the transposition of the RCF requirements. (see response to comment No 459 in [CRD to NPA 2014-05](#)).

comment

489 comment by: *European Cockpit Association*  
The transposition of the ICAO provisions in from Annex 10 and PANS-ATM, including the exemplary standard phraseologies, is supported from the harmonisation perspective.

response

Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14001 General** p. 27

comment

228 comment by: *AESA / DSANA*



COMMENT	JUSTIFICATION
"GM1 SERA.14001 General": replace <b>(Annex 10 - Vol II - 5.1.1.1 - note 1)</b> reference by <b>(Annex 10 - Vol II - 5.1.8 - note 1)</b> .	The right reference is <b>(Annex 10 - Vol II - 5.1.8 - note 1)</b> instead of <b>(Annex 10 - Vol II - 5.1.1.1 - note 1)</b> .

response Accepted  
The reference will be amended.

comment 490 comment by: *European Cockpit Association*  
The transposition of the ICAO provisions in from Annex 10 and PANS-ATM, including the exemplary standard phraseologies, is supported from the harmonisation perspective.

response Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA 14001 General** p. 27

comment 491 comment by: *European Cockpit Association*  
The transposition of the ICAO provisions in from Annex 10 and PANS-ATM, including the exemplary standard phraseologies, is supported from the harmonisation perspective.

response Noted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — AMC1 SERA.14015 Language to be used** p. 27

comment 145 comment by: *René Meier, Europe Air Sports*  
Page 27/77  
AMC1 SERA.14015  
Language to be used  
The provision is not acceptable for GA. This would be seen as a loss of human rights in your own country.  
Proposal:  
Delete the whole provision.  
  
Rationale:  
In large counties this provisions would prevent non-English speaking pilots from using some international airports.



response Not accepted

comment 445 comment by: *Finnish Transport Safety Agency*  
The new text of SERA.14015 seems not to be covered by the AMC/GM. The text in AMC/GM should be updated to elaborate on the new conditions. At least the minimum requirements for such safety assessment should be given.

response Accepted  
In States which decide not to apply the requirement to use the English language, the study referred to in SERA.14015 should include an independent and comprehensive assessment of the impact of not using English for air-ground radio communications. Such an assessment should in particular take into account:

1. any available accident and incident investigation reports at least at EU level, where the use of language has been identified as a contributing factor. For this purpose, the central repository created in accordance with Regulation (EC) No 1321/2007 and Regulation (EU) No 996/2010 for such reports should also be consulted;
2. the proportion of pilots frequenting that airport, with English language proficiency endorsement;
3. the proportion of pilots frequenting that airport, lacking language proficiency endorsement in the alternative language to be used;
4. a consultation of flight crews operating at the airport in question, on their preferences and ability to use the languages in question; and
5. a consultation of the safety investigation authority.

comment 450 comment by: *DTCA*  
Danish Transport and Construction Agency would like to compliment EASA for highlighting the importance of using English as the common language to be used at airports with more than 50.000 international IFR flights.

response Noted

comment 484 comment by: *European Cockpit Association*  
Recognising that unfortunately it is impossible to convince EU Member States to agree on an "English only" international IFR environment, we support the proposed measures to get as close as possible to a uniform environment.

response Noted

comment 497 comment by: *Swedish Transport Agency*  
Sweden would like to emphasize that we are very positive that EASA highlights the



	importance of English as the common language used in airports and in certain airspace served by international flights.
response	Noted

<b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14015 Language to be used</b>	p. 27
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comment	146	comment by: <i>René Meier, Europe Air Sports</i>
	Page 27/77 GM1 SERA.14015 Language to be used The provision is not acceptable for GA. This would be seen as a loss of human rights in your own country. Proposal: Delete the whole provision.  Rationale: This would prevent non-English speaking pilots from using some international airports.	
response	Not accepted	
comment	305	comment by: <i>ENAV</i>
	Please align the title with SERA IR: Language to be used in air-ground communication.	
response	Accepted The title will be amended to read: ‘Language to be used in air–ground communication’	
comment	451	comment by: <i>DTCA</i>
	Danish Transport and Construction Agency supports the inclusion of this GM-paragraph.	
response	Noted	
comment	485	comment by: <i>European Cockpit Association</i>
	Recognising that unfortunately it is impossible to convince EU Member States to agree on an "English only" international IFR environment, we support the proposed measures to get as close as possible to a uniform environment.	
response	Noted	

<b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.14015 Language to be used</b>	p. 27
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comment	147	comment by: René Meier, Europe Air Sports
	Page 27/77 GM2 SERA.14015 Language to be used The provision is not acceptable for GA. This would be seen as a loss of human rights in your own country. Proposal: Delete the whole provision.  Rationale: This would prevent non-English speaking pilots from using some international airports.	
response	Not accepted	
comment	187	comment by: CANSO
	Please align the title with SERA IR: Language to be used in air-ground communication.	
response	Accepted The title will be amended to read: 'Language to be used in air-ground communication'	
comment	486	comment by: European Cockpit Association
	Recognising that unfortunately it is impossible to convince EU Member States to agree on an "English only" international IFR environment, we support the proposed measures to get as close as possible to a uniform environment.	
response	Noted	
comment	496	comment by: Swedish Transport Agency
	Sweden would like to emphasize that we are very positive that EASA highlights the importance of English as the common language used in airports and in certain airspace served by international flights.	
response	Noted	

### 3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — AMC1 SERA.14025

Principles governing the identification of ATS routes other than standard departure and arrival routes

p. 28

comment	103	comment by: NSA Austria
	Why are PANS-OPS requirements used here? What is the operational use for ATCO?	



response Not accepted

These requirements are extracted from ICAO Annex 11 – Appendix 1 – 2.3. The intention of SERA.14025 is to clarify the aspects related to the pronunciation of such items, and the purpose of the associated AMC/GM is to provide complementary information on the subject.

comment 229 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"AMC1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes": add [Annex 11 - Appendix 1 - 4.4] as a reference, so this one should be a combination of two: [Annex 11 - Appendix 1 - 2.4] [Annex 11 - Appendix 1 - 4.4].	"AMC1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes": reference [Annex 11 - Appendix 1 - 2.4] deals with letters "F" and "G" on ATS route designation and its meaning, and the text about flight crews not required to use them in voice COMM comes from [Annex 11 - Appendix 1 - 4.4]. So, both references should be used.

response Accepted

The reference will amended.

comment 423 comment by: UK CAA

**Page No:** 28

**Paragraph No:** AMC1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes

**Comment:**  
The text relates to the non-verbal identification of ATS routes and is not appropriate in Section 14 Voice Communication Procedures. The UK CAA suggests this has no bearing on SERA.14025

**Justification:**  
Removal of inappropriate text.

**Proposed Text:**  
"Delete text."

response Not accepted

The intention of SERA.14025 is to clarify the aspects related to the pronunciation of such items in voice communications. The purpose of the associated AMC/GM is to provide complementary information on the subject (see ICAO Annex 11 – Appendix 1 – 4.4).





**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.14025 Principles governing the identification of ATS routes other than standard departure and arrival routes**

p. 28

comment	86	comment by: <i>NATS National Air Traffic Services Limited</i>
	<p>GM1 SERA.14025</p> <p><i>LETTERS 'K', 'U' AND 'S'</i>  <i>WHERE APPLICABLE, ONE SUPPLEMENTARY LETTER IS ADDED AS A PREFIX TO THE BASIC DESIGNATOR IN ACCORDANCE WITH THE FOLLOWING:</i>  <i>(A) 'K' TO INDICATE A LOW-LEVEL ROUTE ESTABLISHED FOR USE PRIMARILY BY HELICOPTERS;</i>  <i>(B) 'U' TO INDICATE THAT THE ROUTE OR PORTION THEREOF IS ESTABLISHED IN THE UPPER AIRSPACE; AND</i>  <i>(C) 'S' TO INDICATE A ROUTE ESTABLISHED EXCLUSIVELY FOR USE BY SUPERSONIC AIRCRAFT DURING ACCELERATION, DECELERATION AND WHILE IN SUPERSONIC FLIGHT.</i></p> <p>These principles relate to the non-verbal identification of ATS routes and do not belong in Section 14 Voice Communication Procedures. Annex 11, Appendix 1, 4.3 provision is more appropriate. We would suggest:</p> <p><i>WHERE THE PREFIXES K, U OR S SPECIFIED IN 2.3 ARE USED, THEY SHALL, IN VOICE COMMUNICATIONS, BE SPOKEN AS FOLLOWS:</i>  <i>K — KOPTER</i>  <i>U — UPPER</i>  <i>S — SUPERSONIC</i>  <i>THE WORD "KOPTER" SHALL BE PRONOUNCED AS IN THE WORD "HELICOPTER" AND THE WORDS "UPPER" AND "SUPERSONIC" AS IN THE ENGLISH LANGUAGE.</i></p>	
response	<p>Accepted</p> <p>The GM will be removed</p>	

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.14030 Use of designators for standard instrument departure and arrival routes**

p. 28

comment	104	comment by: <i>NSA Austria</i>
	<p>What is "considered to be" supposed to mean if the rule requests to use the plain language designator?</p>	
response	<p>Not accepted</p> <p>This GM provides additional information to SERA.14030 regarding the content of designators and how they are to be pronounced.</p>	
comment	230	comment by: <i>AESA / DSANA</i>



COMMENT	JUSTIFICATION
"GM1 SERA.14030 Use of designators for standard instrument departure and arrival routes": replace reference <b>(Annex 11 - Appendix 3 - Para 7 - note)</b> by <b>(Annex 11 - Appendix 3 - 7.1 - note)</b> .	The right reference is <b>(Annex 11 - Appendix 3 - 7.1 - note)</b> instead of <b>(Annex 11 - Appendix 3 - Para 7 - note)</b> .
response	Accepted  The reference will be amended.

<b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(1) Transmission of numbers in radiotelephony</b>	p. 28-29
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comment	231	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th style="background-color: #d9e1f2;">COMMENT</th> <th style="background-color: #d9e1f2;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14035(a)(1) Transmission of numbers in radiotelephony. CALL SIGN, HEADING, RUNWAY AND WIND": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b>.</td> <td>The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b>.</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.14035(a)(1) Transmission of numbers in radiotelephony. CALL SIGN, HEADING, RUNWAY AND WIND": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	
COMMENT	JUSTIFICATION					
"GM1 SERA.14035(a)(1) Transmission of numbers in radiotelephony. CALL SIGN, HEADING, RUNWAY AND WIND": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .					
response	Accepted  The reference will be amended.					

comment	369	comment by: CAA-NL
	<p><b>GM1 SERA.14035(a)(1) Transmission of numbers in radiotelephony</b></p> <p>The table includes the way information should be transmitted, however the numbers should be written according to the pronunciation rules as in radio communication according to SERA 14014.</p>	
response	Not accepted  The text is aligned with the ICAO examples for consistency and easy reading.	

<b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(1)(i) Transmission of numbers in radiotelephony</b>	p. 29
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comment	232	comment by: AESA / DSANA
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	COMMENT	JUSTIFICATION
	"GM1 SERA.14035(a)(1)(i) Transmission of numbers in radiotelephony. FLIGHT LEVELS": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .
response	Accepted  The reference will be amended.	

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.14035(a)(1)(ii) Transmission of numbers in radiotelephony**

p. 29

comment	206	comment by: EM-LPS				
	<p><i>Comments in italics</i></p> <p><i>Due to possible misinterpreting hPa with inches below 1 000 hPa, e.g. 993 hPa with 29.93 in.Hg, measurement system should be used in phraseology expressing QNH setting below 1 000 hPa. (see for example <a href="http://www.skybrary.aero/bookshelf/books/39.pdf">http://www.skybrary.aero/bookshelf/books/39.pdf</a>)</i></p>					
response	<p>Not accepted</p> <p>The text should be subject to a wider and deeper assessment before a change may be decided. Nevertheless, the subject may be further considered.</p>					
comment	233	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14035(a)(1)(ii) Transmission of numbers in radiotelephony. ALTIMETER SETTING": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b>.</td> <td>The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b>.</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.14035(a)(1)(ii) Transmission of numbers in radiotelephony. ALTIMETER SETTING": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	
COMMENT	JUSTIFICATION					
"GM1 SERA.14035(a)(1)(ii) Transmission of numbers in radiotelephony. ALTIMETER SETTING": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.4.1.1 Note)</b> .					
response	<p>Accepted</p> <p>The reference will be amended.</p>					
comment	327	comment by: DFS Deutsche Flugsicherung GmbH				
	<p>The transmission example should be the same as in ANNEX 10 Vol II</p>					
response	<p>Not accepted</p> <p>The example has been modified to better reflect the difference agreed at European level on the subject of the pronunciation of numbers (SERA.14035(a)(1)(ii)). This difference has been proposed to ICAO and accepted by EANPG. It is currently processed by ICAO and it is</p>					



expected that it will lead to an amendment of Annex 10.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(1)(iii)  
Transmission of numbers in radiotelephony**

p. 29

comment 234

comment by: AESA / DSANA

**COMMENT**

"GM1 SERA.14035(a)(1)(iii) Transmission of numbers in radiotelephony. TRANSPONDER CODES": replace reference **(Annex 10 - Vol II)** by **(Annex 10 - Vol II, 5.2.1.4.1.1 Note)**.

**JUSTIFICATION**

The complete reference is **(Annex 10 - Vol II, 5.2.1.4.1.1 Note)**.

response

Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(2)  
Transmission of numbers in radiotelephony**

p. 29-30

comment 235

comment by: AESA / DSANA

**COMMENT**

"GM1 SERA.14035(a)(2) Transmission of numbers in radiotelephony. ALTITUDE": replace reference **(Annex 10 - Vol II)** by **(Annex 10 - Vol II, 5.2.1.4.1.2 Note)**.

**JUSTIFICATION**

The complete reference is **(Annex 10 - Vol II, 5.2.1.4.1.2 Note)**.

response

Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.14035(a)(2)  
Transmission of numbers in radiotelephony**

p. 30

comment 236

comment by: AESA / DSANA

**COMMENT**

"GM2 SERA.14035(a)(2) Transmission of numbers in radiotelephony. CLOUD HEIGHT": replace reference **(Annex 10 - Vol II)** by **(Annex 10 - Vol II, 5.2.1.4.1.2 Note)**.

**JUSTIFICATION**

The complete reference is **(Annex 10 - Vol II, 5.2.1.4.1.2 Note)**.



response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM3 SERA.14035(a)(2)  
Transmission of numbers in radiotelephony**

p. 30

comment 237 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM3 SERA.14035(a)(2) Transmission of numbers in radiotelephony. VISIBILITY": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.4.1.2 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.4.1.2 Note).

response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM4 SERA.14035(a)(2)  
Transmission of numbers in radiotelephony**

p. 30

comment 238 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM4 SERA.14035(a)(2) Transmission of numbers in radiotelephony. RUNWAY VISUAL RANGE": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.4.1.2 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.4.1.2 Note).

response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(5)  
Transmission of numbers in radiotelephony**

p. 30

comment 239 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 SERA.14035(a)(5) Transmission of numbers in	The complete reference is



	<i>radiotelephony. DECIMALS</i> ": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.4.1.3 Note)</b> .	<b>(Annex 10 - Vol II, 5.2.1.4.1.3 Note)</b> .
response	Accepted The reference will be amended.	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14035(a)(6) Transmission of numbers in radiotelephony** p. 31

comment	240	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14035(a)(6) Transmission of numbers in radiotelephony. TRANSMISSION OF NUMBERS FOR RADIOTELEPHONY CHANNEL FREQUENCIES": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note1)</b>.</td> <td>The complete reference is <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note 1)</b>.</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.14035(a)(6) Transmission of numbers in radiotelephony. TRANSMISSION OF NUMBERS FOR RADIOTELEPHONY CHANNEL FREQUENCIES": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note1)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note 1)</b> .	
COMMENT	JUSTIFICATION					
"GM1 SERA.14035(a)(6) Transmission of numbers in radiotelephony. TRANSMISSION OF NUMBERS FOR RADIOTELEPHONY CHANNEL FREQUENCIES": replace reference <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note1)</b> .	The complete reference is <b>(Annex 10 - Vol II, 5.2.1.7.3.4.3 Note 1)</b> .					
response	Accepted The reference will be amended.					

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14045 Transmitting technique** p. 31

comment	241	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14045 Transmitting technique. BREAK": add reference <b>(Annex 10 - Vol II, 5.2.1.5.8)</b>.</td> <td>There is no reference; <b>(Annex 10 - Vol II, 5.2.1.5.8)</b> should be added.</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.14045 Transmitting technique. BREAK": add reference <b>(Annex 10 - Vol II, 5.2.1.5.8)</b> .	There is no reference; <b>(Annex 10 - Vol II, 5.2.1.5.8)</b> should be added.	
COMMENT	JUSTIFICATION					
"GM1 SERA.14045 Transmitting technique. BREAK": add reference <b>(Annex 10 - Vol II, 5.2.1.5.8)</b> .	There is no reference; <b>(Annex 10 - Vol II, 5.2.1.5.8)</b> should be added.					
response	Accepted The reference will be added.					

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.14045 Transmitting technique** p. 31



comment	33	comment by: CAA-NL
	<p><b>GM2 SERA.14050 Radiotelephony call signs for aircraft</b>                  EXAMPLES OFF FULL AND ABBREVIATED CALL SIGNS                  Full call sign “FABCD” should be N57826 (ref Annex 10 Vol II, Table 5.1)</p>	
response	Accepted The table will be amended accordingly.	

comment	242	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM2 SERA.14045 Transmitting technique. CHECK": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).</td> <td>The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	"GM2 SERA.14045 Transmitting technique. CHECK": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).
COMMENT	JUSTIFICATION					
"GM2 SERA.14045 Transmitting technique. CHECK": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).					
response	Accepted The reference will be amended.					

<p><b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM3 SERA.14045</b>                  Transmitting technique</p>	p. 31
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comment	243	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM3 SERA.14045 Transmitting technique. MAINTAIN": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).</td> <td>The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	"GM3 SERA.14045 Transmitting technique. MAINTAIN": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).
COMMENT	JUSTIFICATION					
"GM3 SERA.14045 Transmitting technique. MAINTAIN": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8).					
response	Accepted The reference will be amended.					

<p><b>3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM4 SERA.14045</b>                  Transmitting technique</p>	p. 31
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comment	244	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM4 SERA.14045 Transmitting technique. OVER": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).</td> <td>The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	"GM4 SERA.14045 Transmitting technique. OVER": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).
COMMENT	JUSTIFICATION					
"GM4 SERA.14045 Transmitting technique. OVER": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).					



response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM5 SERA.14045  
Transmitting technique**

p. 32

comment 245 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM5 SERA.14045 Transmitting technique. OUT": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).

response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM6 SERA.14045  
Transmitting technique**

p. 32

comment 25 comment by: ATCEUC - Air Traffic Controllers European Unions Coordination

The text does not cover all cases where “roger” is not acceptable as an answer. New wording proposed.

‘ROGER’ is under no circumstances to be used in reply to a question requiring ‘READ BACK’ or a direct answer in the affirmative (AFFIRM) or negative (NEGATIVE) any ATC question nor instruction or clearance requiring “read back”

response Not accepted  
The text of the proposed GM is aligned with ICAO and is considered appropriate to cover this issue.

comment 123 comment by: Malta Air Traffic Controllers' Association

EASA should clarify and stress that ROGER cannot be used by PIC as the only reply to an ATC clearance or any ATC transmission that requires a full and clear readback

response Not accepted  
The text of the proposed GM is aligned with ICAO and is considered appropriate to cover this issue.

comment 246 comment by: AESA / DSANA





COMMENT	JUSTIFICATION
"GM6 SERA.14045 Transmitting technique. ROGER": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).
response	Accepted The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM7 SERA.14045 Transmitting technique** p. 32

comment	247	comment by: AESA / DSANA
COMMENT	JUSTIFICATION	
"GM7 SERA.14045 Transmitting technique. STANDBY": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).	
response	Accepted The reference will be amended.	

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM8 SERA.14045 Transmitting technique** p. 32

comment	105	comment by: NSA Austria
	Why should that be so? If there is spare time on the frequency the ATCO will tell the reason as a part of service-orientation This only gives room to discussions on the frequency	
response	Noted The text of the proposed GM is aligned with ICAO and is considered appropriate to cover this issue.	

comment	248	comment by: AESA / DSANA
COMMENT	JUSTIFICATION	
"GM8 SERA.14045 Transmitting technique. UNABLE": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.5.8 Note).	The complete reference is (Annex 10 - Vol II, 5.2.1.5.8 Note).	



response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14050  
Radiotelephony call signs for aircraft**

p. 32

comment 249 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 SERA.14050 Radiotelephony call signs for aircraft PREFIX TO CALL SIGNS": replace reference (Annex 10 - Vol II) by (Annex 10 - Vol II, 5.2.1.7.2.1.1 Note 1).	The complete reference is (Annex 10 - Vol II, 5.2.1.7.2.1.1 Note 1).

response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM2 SERA.14050  
Radiotelephony call signs for aircraft**

p. 32

comment 26 comment by: ATCEUC - Air Traffic Controllers European Unions Coordination

Instead of FABCD (in the second column) it should be N57826.

response Accepted  
The table will be amended accordingly.

comment 124 comment by: Malta Air Traffic Controllers' Association

instaed of FABCD in the second column, it should read N57826

response Accepted  
The table will be amended accordingly.

comment 250 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM2 SERA.14050 Radiotelephony call signs for aircraft EXAMPLES OF FULL AND ABBREVIATED CALL SIGNS": replace reference (Annex 10 - Vol II) by (Annex 10 -	The complete reference is (Annex 10 - Vol II, 5.2.1.7.2.1.1 Note 1). In this reference the example in the first column is different: "N 57826"



<b>Vol II, 5.2.1.7.2.1 Table 5-1).</b> In addition to that, in this reference the example in the first column is different: "N 57826" instead of "FABCD". Is there any reason for this?	instead of "FABCD".
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response Accepted  
The table will be amended accordingly.

comment 370 comment by: CAA-NL

**GM2 SERA.14050 Radiotelephony call signs for aircraft**  
EXAMPLES OFF FULL AND ABBREVIATED CALL SIGNS  
Full call sign "FABCD" should be N57826 (ref Annex 10 Vol II, Table 5.1)

response Accepted  
The table will be amended accordingly.

comment 499 comment by: Swedish Transport Agency

Please replace N26 or N826 with FCD or FBCD. Alternatively N57826 in the bottom line for it to comply with the "Abbreviated callsign".

response Accepted  
The table will be amended accordingly.

### 3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.14055(b) Radiotelephony procedures

p. 33

comment 87 comment by: NATS National Air Traffic Services Limited

GM1 SERA.14055(b)

**\*\* WITH THE EXCEPTION OF THE TELEPHONY DESIGNATORS AND THE TYPE OF AIRCRAFT, EACH CHARACTER IN THE CALL SIGN IS TO BE SPOKEN SEPARATELY. WHEN INDIVIDUAL LETTERS ARE SPELLED OUT, THE RADIOTELEPHONY SPELLING ALPHABET PRESCRIBED IN SERA.14020 IS TO BE USED. NUMBERS ARE TO BE SPOKEN IN ACCORDANCE WITH SERA.14040.**

From the table in SERA.14040, it may be interpreted to mean that the callsign ABC1234 could be transmitted as "ALPHA BRAVO CHARLIE TWELF TREE FOWER". SERA.14040 is taken from Annex 10, Vol 11, 5.2.1.4.3.1 and this does not appear to allow the first two numbers to be pronounced as "TWELF" .

response Not accepted



comment	251	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th style="background-color: #e6f2ff;">COMMENT</th> <th style="background-color: #e6f2ff;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14055(b) Radiotelephony procedures RADIOTELEPHONY CALLING PROCEDURE*": replace references of 1st and 2nd table: <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2 respectively)</b>.</td> <td>The complete references are <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2)</b>.</td> </tr> </tbody> </table>		COMMENT	JUSTIFICATION	"GM1 SERA.14055(b) Radiotelephony procedures RADIOTELEPHONY CALLING PROCEDURE*": replace references of 1st and 2nd table: <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2 respectively)</b> .	The complete references are <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2)</b> .
COMMENT	JUSTIFICATION					
"GM1 SERA.14055(b) Radiotelephony procedures RADIOTELEPHONY CALLING PROCEDURE*": replace references of 1st and 2nd table: <b>(Annex 10 - Vol II)</b> by <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2 respectively)</b> .	The complete references are <b>(Annex 10 - Vol II, 5.2.1.7.3.2.1 Table 5-2 and 5.2.1.7.3.2.3 Table 5-2)</b> .					
response	Accepted The reference will be amended.					

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 SERA.14090(b) Specific communication procedures**

p. 34

comment	88	comment by: NATS National Air Traffic Services Limited
	<p><i>A) AIR TRAFFIC ADVISORY SERVICE DOES NOT AFFORD THE DEGREE OF SAFETY AND CANNOT ASSUME THE SAME RESPONSIBILITIES AS ATC SERVICE IN RESPECT OF THE AVOIDANCE OF COLLISIONS, SINCE INFORMATION REGARDING THE DISPOSITION OF TRAFFIC IN THE AREA CONCERNED AVAILABLE TO THE UNIT PROVIDING AIR TRAFFIC ADVISORY SERVICE MAY BE INCOMPLETE. (PANS-ATM 9.1.4.1.3)</i></p> <p><i>(B) AIRCRAFT WISHING TO CONDUCT IFR FLIGHTS WITHIN ADVISORY AIRSPACE, BUT NOT ELECTING TO USE THE AIR TRAFFIC ADVISORY SERVICE, ARE NEVERTHELESS TO SUBMIT A FLIGHT PLAN, AND NOTIFY CHANGES MADE THERETO TO THE UNIT PROVIDING THAT SERVICE. (PANS-ATM 9.1.4.2.2.1)</i></p> <p><i>(C) ATS UNITS PROVIDING AIR TRAFFIC ADVISORY SERVICE:</i></p> <p><i>(1) ADVISE THE AIRCRAFT TO DEPART AT THE TIME SPECIFIED AND TO CRUISE AT THE LEVELS INDICATED IN THE FLIGHT PLAN IF IT DOES NOT FORESEE ANY CONFLICT WITH OTHER KNOWN TRAFFIC;</i></p> <p><i>(2) SUGGEST TO AIRCRAFT A COURSE OF ACTION BY WHICH A POTENTIAL HAZARD MAY BE AVOIDED, GIVING PRIORITY TO AN AIRCRAFT ALREADY IN ADVISORY AIRSPACE OVER OTHER AIRCRAFT DESIRING TO ENTER SUCH ADVISORY AIRSPACE; AND</i></p> <p><i>(3) PASS TO AIRCRAFT TRAFFIC INFORMATION COMPRISING THE SAME INFORMATION AS THAT PRESCRIBED FOR AREA CONTROL SERVICE (PANS-ATM 9.1.4.3.1)</i></p> <p>These principles relate to the service provision aspects of an Air Traffic Advisory Service and do not belong in Section 14 Voice Communication Procedures. We believe this is inappropriate GM and should be removed.</p>	



response	Partially accepted This GM will be moved and associated with Article 2(27).
comment	371 <span style="float: right;">comment by: CAA-NL</span> <b>GM1 SERA.14090(b) Specific communication procedures</b> The sentence of “(c) ATS units providing air traffic advisory service:” is incomplete and ends in PANS ATM with shall.
response	Not accepted AMC and GM do not contain legislative provisions and therefore cannot use any language that expresses an obligation (‘shall’). Given their ‘soft law’ nature, only ‘should’ is to be used. Consequently, ‘shall’ has been removed. However, it must be understood that this GM is describing a service that is described elsewhere and the direct use of the verbs ‘advise’, ‘suggest’ and ‘pass’ reflects the ATC actions that will happen, and do not only constitute an additional information. Therefore the text will be kept as it is. Based on comments Nos 88 and 424, this GM will be moved and associated with Article 2(27).
comment	424 <span style="float: right;">comment by: UK CAA</span> <b>Page No:</b> 34 <b>Paragraph No:</b> GM1 SERA.14090(b) Specific communication procedures <b>Comment:</b> While the value of the proposed GM is not in question, the UK CAA suggests that it is inappropriate to present it under SERA.14090 and that it is more appropriate to present it either as GM to Reg 923/2012 Article 2(27) or SERA.6001(f). Alternatively the text could be deleted and instead incorporate it into the forthcoming Part-ATS. <b>Justification:</b> Presentation of text in a more appropriate place.
response	Accepted This GM will be moved and associated with Article 2(27).

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 SERA.14095(c)(2) Distress and urgency radiotelephony communication procedures** p. 35

comment	253 <span style="float: right;">comment by: AESA / DSANA</span>				
	<table border="1" style="width: 100%;"> <thead> <tr> <th style="background-color: #e6f2ff;">COMMENT</th> <th style="background-color: #e6f2ff;">JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 SERA.14095(c)(2) Distress and urgency radiotelephony communication procedures ACTION BY ATS WHEN AN URGENCY SITUATION IS REPORTED": add "Note" to (Annex 10 - Vol II - 5.3.3.2.1 - b 2)) reference: (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).</td> <td>The complete reference is (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 SERA.14095(c)(2) Distress and urgency radiotelephony communication procedures ACTION BY ATS WHEN AN URGENCY SITUATION IS REPORTED": add "Note" to (Annex 10 - Vol II - 5.3.3.2.1 - b 2)) reference: (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).	The complete reference is (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).
COMMENT	JUSTIFICATION				
"GM1 SERA.14095(c)(2) Distress and urgency radiotelephony communication procedures ACTION BY ATS WHEN AN URGENCY SITUATION IS REPORTED": add "Note" to (Annex 10 - Vol II - 5.3.3.2.1 - b 2)) reference: (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).	The complete reference is (Annex 10 - Vol II - 5.3.3.2.1 - b) 2) Note).				



response Accepted  
The reference will be amended.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 Appendix 5-2 – Section 1 – Item 2 - Position**

p. 36

comment 188 comment by: CANSO  
Item 2, Position - The quotation mark at the end of the example should be removed

response Accepted

comment 254 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 Appendix 5 - 2 -Section 1 - Item 2 - Position": replace title by "GM1 Appendix 5 - 1.2 - Section 1 - Item 2 - Position" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.2.1 Section 1 - Item 2).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.2.1 Section 1 - Item 2).

response Partially accepted  
The title will be retained but the reference to PANS ATM will be completed.

comment 307 comment by: ENAV  
Item 2, Position - The quotation mark at the end of the example should be removed

response Accepted

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 Appendix 5-2 – Section 1 – Item 4 - Flight level or altitude**

p. 36

comment 255 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 Appendix 5 - 2 – Section 1 – Item 4 - Flight level or altitude": replace title by "GM1 Appendix 5 - 1.2 – Section 1 – Item 4 - Flight level or altitude" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.2.1 Section 1 - Item 4).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.2.1 Section 1 - Item 4).



response Partially accepted  
The title will be retained but the reference to PANS ATM will be completed.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 Appendix 5-2 – Section 3 – Item 9 - Phenomenon prompting a special air-report – volcanic eruption**

p. 36

comment 256 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 Appendix 5 - 2 – Section 3 – Item 9 - Phenomenon prompting a special air-report – volcanic eruption": replace title by "GM1 Appendix 5 - 1.2 – Section 3 – Item 9 - Phenomenon prompting a special air-report – volcanic eruption" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.2.1 Section 3 - Item 9 Note).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.2.1 Section 3 - Item 9 Note).

response Partially accepted  
The title will be retained but the reference to PANS ATM will be completed.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 Appendix 5–3 - Aircraft identification**

p. 36

comment 257 comment by: AESA / DSANA

COMMENT	JUSTIFICATION
"GM1 Appendix 5 – 3 - Aircraft identification": replace title by "GM1 Appendix 5 – 1.3 - Forwarding of meteorological information received by voice communications. Aircraft identification" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3).

response Partially accepted  
The title will be retained but the reference to PANS ATM will be completed.

**3.1 Draft EASA Decision — AMC/GM to Annex ‘RULES OF THE AIR’ — GM1 Appendix 5–3 – Section 1 – Item 0 - Position**

p. 36



comment	258	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 Appendix 5 – 3 – Section 1 – Item 0 - Position": replace title by "GM1 Appendix 5 – 1.3 - Section 1 – Item 0 - Position" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).</td> <td>Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 Appendix 5 – 3 – Section 1 – Item 0 - Position": replace title by "GM1 Appendix 5 – 1.3 - Section 1 – Item 0 - Position" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	
COMMENT	JUSTIFICATION					
"GM1 Appendix 5 – 3 – Section 1 – Item 0 - Position": replace title by "GM1 Appendix 5 – 1.3 - Section 1 – Item 0 - Position" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).					
response	Partially accepted The title will be retained but the reference to PANS ATM will be completed.					

**3.1 Draft EASA Decision — AMC/GM to Annex 'RULES OF THE AIR' — GM1 Appendix 5 – 1.1.4 and 3.1 Examples of special air reports by voicecommunication**

p. 36-37

comment	152	comment by: René Meier, Europe Air Sports				
	<p>Page 36/77 GM1 Appendix 5 - 1.1.4 and 3.1 Examples... Please replace the "Clipper" belonging to PanAm, defunct since 1991, by something else, PAA is not used anymore, "Clipper 101" no longer flies.</p> <p>Rationale: Your new documents should reflect today's situation and not propose callsigns, names, abbreviations or acronyms of entities no longer existing.</p>					
response	Not accepted The Agency's intention is to maintain consistency with ICAO.					
comment	259	comment by: AESA / DSANA				
	<table border="1"> <thead> <tr> <th>COMMENT</th> <th>JUSTIFICATION</th> </tr> </thead> <tbody> <tr> <td>"GM1 Appendix 5 – 1.1.4 and 3.1 Examples of special air reports by voice communication": replace title by "GM1 Appendix 5 – 1.1.4 and 3 Examples of special air reports by voice communication" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).</td> <td>Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).</td> </tr> </tbody> </table>	COMMENT	JUSTIFICATION	"GM1 Appendix 5 – 1.1.4 and 3.1 Examples of special air reports by voice communication": replace title by "GM1 Appendix 5 – 1.1.4 and 3 Examples of special air reports by voice communication" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	
COMMENT	JUSTIFICATION					
"GM1 Appendix 5 – 1.1.4 and 3.1 Examples of special air reports by voice communication": replace title by "GM1 Appendix 5 – 1.1.4 and 3 Examples of special air reports by voice communication" and reference (PANS-ATM Appendix 1) by (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).	Title was not exact, and the complete reference is (PANS-ATM Appendix 1, 1.3, Section 1, Item 0).					
response	Partially accepted The title will be retained but the reference to PANS ATM will be completed.					

**6. Appendices — Appendix I — GM1 SERA.14001 General**

p. 40





comment	37	comment by: <i>ENAIRE</i>
	General commentary. The fact that there does not exist a consolidated version of the regulatory material to what AMC/GMs are referred, it brings more difficulty to the tasks of analysing and commenting on NPA 2015-14. To our viewpoint, NPA 2015-14 should be still active until a consolidated Regulation has finally appeared. Thus, commentaries would be more useful.	
response	Noted A consolidated version will be developed.	
comment	38	comment by: <i>ENAIRE</i>
	General commentary: Transposing ICAO standards should mean a clarification on its contents and it should contribute to a more homogeneous interpretation in all member States. After having read all AMC/GMs included with NPA 2015-14, it can be proved that this is not always the case.	
response	Noted	
comment	39	comment by: <i>ENAIRE</i>
	General commentary. In order to measure magnitudes, International System of Units is proposed as an alternative to units commonly used in aviation (e.g. metre, km. per hour instead of feet, knots, feet per second, etc.). The use of heterogeneous units is risky while the use of aviation classical units is one of the fundamental pillars in fostering and assuring safety in air transport.	
response	Not accepted  The EU competent authority may decide to agree on such proposals regarding the units to be used in the applicable regulatory material. However, it should be noted that such a decision cannot apply to the phraseology only and that the application of this principle would also impact the SERA IR. Even more, beyond the SERA IR and for consistency, it would probably mean an in-depth review of the whole set of relevant regulations. This has not been done yet and would require significant resources to be allocated. As an example, runway lengths or distance from clouds are in many cases still expressed in metres in Europe and EUROCONTROL would like to draw the attention on the fact that a quick removal of 'metres', 'kilometres', 'metres per second' or 'km/h' without careful assessment might have unintended consequences.	
comment	125	comment by: <i>Malta Air Traffic Controllers' Association</i>
	EASA should standardise the units used in the European scenario, therefore EASA should always use FEET, MILES, FEET/SEC AND KNOTS. It should refrain from using METRES and KILOMETRES and other metric units used by ICAO.	



response	<p>Not accepted</p> <p>The EU competent authority may decide to agree on such proposals regarding the units to be used in the applicable regulatory material. However, it should be noted that such a decision cannot apply to the phraseology only and that the application of this principle would also impact the SERA IR. Even more, beyond the SERA IR and for consistency, it would probably mean an in-depth review of the whole set of relevant regulations. This has not been done yet and would require significant resources to be allocated. As an example, runway lengths or distance from clouds are in many cases still expressed in metres in Europe and EUROCONTROL would like to draw the attention on the fact that a quick removal of ‘metres’, ‘kilometres’, ‘metres per second’ or ‘km/h’ without careful assessment might have unintended consequences.</p>
comment	<p>126 <span style="float: right;">comment by: <i>Malta Air Traffic Controllers' Association</i></span></p> <p>Define the use of * since the beginning of the appendix</p>
response	<p>Not accepted</p> <p>The use of ‘*’ is already explained throughout the Appendix.</p>
comment	<p>329 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span></p> <p>The AMC/GM related to SERA.14000 very often introduce new points that are not subject to Doc 4444 for no obvious reason.</p> <p>DFS regrets that modifications to original ICAO text have not been commonly discussed in advance to drafting SERA.</p> <p>There might be modifications which can be agreed upon. DFS even proposes changes to some Doc 4444 provisions which may be subject to a pan-European deviation.</p> <p>So it would be good to know the mechanism applied for changes/deviations.</p> <p>See our following comments on Appendix to SERA.14001.</p>
response	<p>Noted</p> <p>Apart from:</p> <ul style="list-style-type: none"> <li>— the current review of comments which may lead to changes; and</li> <li>— some editorial adaptations required by the transposition exercise,</li> </ul> <p>the provisions proposed in the NPA which are different from the content of Doc 4444 stem from:</p> <ul style="list-style-type: none"> <li>• differences agreed in the SERA Part C IR, or</li> <li>• coming from recent ICAO updates, or</li> <li>• Doc 7030.</li> </ul> <p>A few changes are proposed on the basis of EANPG agreements to proposals for amendments.</p>



comment	487	comment by: <i>European Cockpit Association</i>
	The transposition of the ICAO provisions in from Annex 10 and PANS-ATM, including the exemplary standard phraseologies, is supported from the harmonisation perspective.	
response	Noted	
comment	513	comment by: <i>ENAC Italy</i>
	The AMC/GM related to SERA.14000 very often introduces new points that are not subject to Doc 4444. Some are very interesting, however deviations that are notified by individual member states or new suggestions for these AMC/GM that are made by single stakeholders should have been commonly discussed for their potential to become pan-European deviations.	
	Therefore we believe that those deviations should follow the ICAO or regional procedure before being adopted by SERA.	
response	<p>Noted</p> <p>Apart from:</p> <ul style="list-style-type: none"> <li>— the current review of comments which may lead to changes; and</li> <li>— some editorial adaptations required by the transposition exercise,</li> </ul> <p>the provisions proposed in the NPA which are different from the content of Doc 4444 stem from:</p> <ul style="list-style-type: none"> <li>• differences agreed in the SERA Part C IR, or</li> <li>• coming from recent ICAO updates, or</li> <li>• Doc 7030.</li> </ul> <p>A few changes are proposed on the basis of EANPG agreements to proposals for amendments.</p>	

**6. Appendices — Appendix I — AMC1 SERA.14001 General**

p. 40-77

comment	7	comment by: <i>ISAVIA ohf.</i>
	<p>1.1.4</p> <p>b) AT (or OVER) (time or place) [or WHEN] PASSING/LEAVING/REACHING (level)] CONTACT unit call sign) (frequency)</p> <p>=&gt;</p> <p>"(" is missing in front of "unit call sign"</p>	



response Accepted  
The text will be amended accordingly.

comment 8 comment by: ISAVIA ohf.  
1.1.8  
p) INSTRUMENT METEOROLOGICAL CONDITIONS REPORTED (or forecast) IN THE VICINITY OF (location)

=>

Should the word "forecast" be in capital letters as it denotes a word that would be transmitted, just like the word "REPORTED"?

Item p) is directly from PANS-ATM 11.4.3.2.1 but is not in chapter 12 of PANS-ATM (like other phraseologies). The norm in chapter 12 of PANS-ATM and also in NPA 2015-14 Appendix 1 AMC1 SERA.14001 is that words what would be transmitted are in capital letters but words like (location) in 1.1.8 item p) (which signifies that a particular location would be transmitted, not the word "location" itself), would not be in capital letters.

response Not accepted  
In this case, IMC may be reported, or alternatively forecast. Depending on the intention either to describe the word that must be pronounced (REPORTED or FORECAST or to describe the origin (reported or forecast) of the information to be transmitted), both options could be possible. With no additional details available, the ICAO wording should be retained.

comment 9 comment by: ISAVIA ohf.  
1.4.10  
...advising take-off run available from an intersection take-off position.

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

=>

Should the latter part be like this?

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

response Accepted  
This text is directly copied from EUROPEAN REGIONAL SUPPLEMENTARY PROCEDURES as



published by ICAO. However, it is recognised that in this case, the text does not follow the drafting convention of PANS-ATM Chapter 12. For consistency inside the document, the text will be amended according to the drafting convention of PANS ATM, to read:  
'TORA RUNWAY (*number*), FROM INTERSECTION (*designation or name of intersection*), (*distance*) METRES'

comment	11	comment by: CAA-Norway
	CAA-Norway questiones if paragraph 1.1.11 g), h), i) and j) are consistant with the current PANS-ATM of 13 November 2014?	
response	<p>Accepted</p> <p>The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR</i>;</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR</i>);</p> <p>i) RUNWAY (<i>or TAXIWAY</i>) (<i>number</i>) WET [<i>or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)</i>];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>	
comment	28	comment by: ATCEUC - Air Traffic Controllers European Unions Coordination
	Since the asterisks are used throughout the document, we suggest explaining their meaning, at the beginning of the appendix, instead of repeating over and over what they represent.	
response	Not accepted	
comment	29	comment by: ATCEUC - Air Traffic Controllers European Unions Coordination
	Traffic in final might not be the only reason for expediting crossing the runway, so square brackets should be used.	
	<b>1.4.9 To cross a runway</b>	
	c) EXPEDITE CROSSING RUNWAY ( <i>number</i> ) [TRAFFIC ( <i>aircraft type</i> )]( <i>distance</i> ) KILOMETRES ( <i>or MILES</i> ) FINAL [ <i>reasons</i> ]]	
response	<p>Not accepted</p> <p>It should be noted that phraseologies are put together in the present document, but they do not necessarily correspond in all possible cases that may happen in reality. The present phraseologies constitute an AMC to SERA.14001 which reads: 'Standardised phraseology shall be used in all situations for which it has been specified. Only when standardised phraseology cannot serve an intended transmission, plain language shall be used.'</p>	



comment	<p>30 comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i></p> <p>ATCOs must always say/specify the number of the runway, and not only, as the footnote says, “when there is the possibility of confusion during multiple runway operations”, since even with just one runway operating, sometimes weather conditions (or other events) may lead to changing the runway in use/allocated for the aircraft, and it is important that the pilot acknowledges he is proceeding to the right runway.</p> <p><b>1.4.10 Preparation for take off</b></p> <p>LINE UP [AND WAIT] <u>RUNWAY (number)</u></p>
response	<p>Not accepted</p> <p>Due to lack of assessment (risk of excessive frequency occupation, risk of confusion, etc.), this proposal deviating from ICAO cannot be accepted without further evaluation. Additionally, this type of clearance should be delivered only to an aircraft unambiguously identified at the proper holding point and ready to line up.</p>
comment	<p>31 comment by: <i>ATCEUC - Air Traffic Controllers European Unions Coordination</i></p> <p>Once the take-off from intersection has been denied, it doesn't necessarily to be from another intersection. It could, though. That's why I think it should be between square brackets.</p> <p><b>1.4.10 Preparation for take off</b></p> <p>NEGATIVE, TAXI TO HOLDING POINT RUNWAY (number), [INTERSECTION (designation or name of intersection)]</p>
response	<p>Not accepted</p> <p>The text is reflecting the continuation of the example given in the question and corresponds to the given situation of ‘...request for departure from an intersection take-off position’ and in the present case of ‘...denial of departure from an intersection take-off position’</p>
comment	<p>40 comment by: <i>ENAIRE</i></p> <p>In page 59 (Appendix I, paragraph 1.4.10), the phraseology “LINE UP [AND WAIT]” (subparagraph f) is omitting “Runway designator” while this information should be mandatory in order to avoid mistakes in aerodromes with more than one active runway.</p>
response	<p>Not accepted</p> <p>The case of multiple runway operation is covered in 1.4.10 g).</p>
comment	<p>89 comment by: <i>NATS National Air Traffic Services Limited</i></p> <p><b>1.1.2 Level Changes Reports and Rates</b></p> <p>a) <i>CLIMB (or DESCEND)</i>; <i>followed as necessary by</i>;</p> <p>1) <i>TO (LEVEL)</i></p> <p>2) <i>TO AND MAINTAIN BLOCK (level) TO (level)</i></p>



The word “TO” in these examples is not considered to add any value to the ATC instruction and as it is used frequently it adds to RTF loading in busy airspaces.

We would suggest this should be changed to:

1.1.2 Level Changes Reports and Rates

a) CLIMB (or DESCEND);

followed as necessary by;

1) ~~TO~~(LEVEL)

2) ~~TO~~ AND MAINTAIN BLOCK (level) TO (level)

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	<p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS ‘LEVEL’)</p> <p><i>Note.— In circumstances where clarification is required the word ‘ALTITUDE’ or ‘HEIGHT’ may be included, e.g. ‘DESCEND TO ALTITUDE TWO THOUSAND FEET’.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>a) FLIGHT LEVEL (number); or                  b) [HEIGHT] (number) METRES; or                  c) [ALTITUDE] (number) FEET.</p> <p>d) (number) FEET (or METRES) ABOVE (or BELOW)</p>
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It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:



<p>2.1.8</p>	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN;</p> <p>2) SLOW MOVING;</p> <p>3) FAST MOVING;</p> <p>4) CLOSING;</p> <p>5) OPPOSITE (or SAME) DIRECTION;</p> <p>6) OVERTAKING;</p> <p>7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT);</p> <p>8) (aircraft type)</p> <p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 90 comment by: NATS National Air Traffic Services Limited

1.1.4 Transfer of Control and/or frequency change  
d) STANDBY FOR (unit callsign) (frequency)

Normal instruction would be “CONTACT (unit callsign) (frequency)”. Interpretation of “STANDBY” is for the pilot to wait for further instructions on the current channel. “STANDBY FOR” has the potential for an aircraft to not change channel but to remain on current channel and wait until instructed to change channel to the new unit and frequency.

response Noted  
This point has been identified as having a potential for improvement and some works have been initiated and carried out by EUROCONTROL/APDSG. However, considering other ongoing developments, no proposal for amendment of PANS ATM has been decided yet and it is proposed to keep the ICAO options as they currently are.

comment 91 comment by: NATS National Air Traffic Services Limited

1.1.8 Meteorological Conditions.  
Note. Wind is always expressed by giving the mean direction and speed and any significant variations

Not if the wind is calm; this is an incorrect statement and we would suggest:

1.1.8 Meteorological Conditions.  
Note. **Except when it is calm, w**Wind is always expressed by giving the mean direction and speed and any significant variations.

response Not accepted  
There is no formal contradiction if considering that the phrase ‘wind is expressed’ means





that there is some wind and on the contrary, 'no wind' may be expressed by 'calm'.

comment	<p>92 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>.1.11 Aerodrome Information.</i></p> <p>Paras g) &amp; h) were amended in PANS-ATM amendment 6 Para i) was deleted in PANS-ATM amendment 6</p> <p>This is an incorrect transposition and should be as per PANS-ATM amendment 6</p>
response	<p>Accepted</p> <p>The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR</i>);</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR</i>);</p> <p>i) RUNWAY (<i>or TAXIWAY</i>) (<i>number</i>) WET [<i>or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)</i>];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>
comment	<p>93 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p> <p><i>2.3 Secondary surveillance radar (SSR) and ADS-B phraseologies</i></p> <p><i>2.3.9 TO REQUEST EMERGENCY CODE SQUAWK MAYDAY [CODE SEVEN-SEVEN-ZERO-ZERO].</i></p> <p><i>A7000 is the emergency code and covers Mayday and Pan situations. Therefore ATC ask pilot to squawk emergency and not Mayday.</i></p> <p>This is an incorrect application and we believe should read:</p> <p><i>2.3.9 TO REQUEST EMERGENCY CODE</i></p> <p><i>SQUAWK <b>EMERGENCY</b> <del>MAYDAY</del> [CODE SEVEN-SEVEN-ZERO-ZERO].</i></p>
response	<p>Not accepted</p> <p>Although the comment is understood, it is considered that no deviation from ICAO should be introduced on such a sensitive subject. Rather, an amendment to PANS ATM should be proposed to ensure common understanding at global level.</p>
comment	<p>94 <span style="float: right;">comment by: NATS National Air Traffic Services Limited</span></p>



5.1 Ground Crew/Flight Crew Phraseologies

SERA is rules of the air. No requirement for this phraseology. PANS-ATM Ground-Ground Chapter 12 phraseology not included in SERA for the same reason. This is an inappropriate transposition and we believe should be removed.

response

Not accepted  
It is considered that phraseologies to be used between flight crew and ground crew are eligible to SERA as ICAO Annex 2 Rules of the air also includes marshalling signals in its appendix 1.

comment

106

comment by: NSA Austria

1.1.2

“to” in level instructions is optional only in Austria amongst many other countries – for good reasons- so that there is no misinterpretation with “two”  
We recommend to keep this as it is as.

response

Partially accepted  
The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS ‘(LEVEL)’) <p>Note.— In circumstances where clarification is required the word ‘ALTITUDE’ or ‘HEIGHT’ may be included, e.g. ‘DESCEND TO ALTITUDE TWO THOUSAND FEET’.</p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>a) FLIGHT LEVEL (number); or</p> <p>b) [HEIGHT] (number) METRES; or</p> <p>c) [ALTITUDE] (number) FEET.</p> <p>d) (number) FEET (or METRES) ABOVE (or BELOW)</p>
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It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned



with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

2.1.8	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN;</p> <p>2) SLOW MOVING;</p> <p>3) FAST MOVING;</p> <p>4) CLOSING;</p> <p>5) OPPOSITE (or SAME) DIRECTION;</p> <p>6) OVERTAKING;</p> <p>7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT);</p> <p>8) (aircraft type)</p> <p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 107 comment by: NSA Austria

RTF for TO Clearance misses out the correct an COMPLETE RTF phrase covering wind information to be transmitted BEFORE issuance of TO CLC  
Appendix 2

response Not accepted

Wind is only to be given when there are significant changes as compared to the information given before taxiing. In this context, it should be mentioned that other significant changes are also listed in PANS-ATM but not included in the phraseology examples.

comment 108 comment by: EUROCONTROL

**Appendix I - Page 40**  
**AMC1 SERA.14001 General**  
**1. ATC PHRASEOLOGIES**  
**1.1 General**  
**1.1.2 LEVEL CHANGES, REPORTS AND RATES**

The EUROCONTROL Agency has several observations and comments to make.

Observations

1. It understands well that standard phraseology reduces the risk that a message will be misunderstood and aids the read-back/hear-back process so that any error is quickly detected.



2. It acknowledges the fact that ambiguous phraseology is a frequent causal or contributory factor in aircraft accidents and incidents.
3. It notes in particular that the question of how and whether to use 'to' or 'for' or not, as presented in detail in section on 'LEVEL CHANGES, REPORTS AND RATES', addresses the concern of misunderstanding and/or ambiguity.
4. The EUROCONTROL Agency therefore shares the view that it does not seem sensible to promote a situation where it may be possible to confuse the words 'two' and 'to' or 'four' and 'for'.
5. It knows that a number of States have already published differences to the ICAO phraseology on this topic, prohibiting sometimes the use of 'to' and 'for' when giving level-related clearances.

#### Comments

1. The EUROCONTROL Agency is involved both in Air Navigation Service Provision (MUAC within FABEC) and in the works of the ATM Procedures Development Sub-Group (APDSG) with the aim, for the latter, to develop a proposal for amendment to the Procedures for Air Navigation Services - Air Traffic Management (PANS-ATM, Doc 4444) on the subject.
2. Although Appendix I could be changed by including the following text 'In the English language the words 'TO' and 'FOR' shall not be used in connection with the assignment or reporting of levels.', thus following the line adopted by some States which have already published this difference to the ICAO phraseology, it seems preferable to favour a global approach through the alignment of Appendix I with the possible future content of Doc 4444 following APDSG proposal for amendment.

response Accepted  
The evolution of PANS ATM will be monitored and the phraseology will be amended accordingly.

comment 127 comment by: *Malta Air Traffic Controllers' Association*  
1.4.9 to cross a runway:  
the kilometres should be removed and reason for the expedite should be stated at the end of the transmission.

response Not accepted  
The EU competent authority may decide to agree on such proposals regarding the units to be used in the applicable regulatory material. However, it should be noted that such a decision cannot apply to the phraseology only and that the application of this principle would also impact the SERA IR. Even more, beyond the SERA IR and for consistency, it would probably mean an in-depth review of the whole set of relevant regulations. This has not been done yet and would require significant resources to be allocated. As an example, runway lengths or distance from clouds are in many cases still expressed in metres in Europe and EUROCONTROL would like to draw the attention on the fact that a quick removal of 'metres', 'kilometres', 'metres per second' or 'km/h' without careful assessment might have unintended consequences.



2- On the issue of putting the reason at the end of the transmission:  
Not accepted  
It should be noted that phraseologies are put together in the present document, but they do not necessarily correspond in all possible cases that may happen in reality. The present phraseologies constitute an AMC to SERA.14001 which reads: ‘Standardised phraseology shall be used in all situations for which it has been specified. Only when standardised phraseology cannot serve an intended transmission, plain language shall be used.’

comment 128 comment by: *Malta Air Traffic Controllers' Association*

1.4.10 Preparation for take off  
ADD Runway indicator at the end of transmission since this is imperative for all ATC clearance that grant entry to a runway and also helps in the situation awareness of the PIC

response Not accepted  
Due to lack of assessment (risk of excessive frequency occupation, risk of confusion, etc.), this proposal deviating from ICAO cannot be accepted without further evaluation. Additionally, this type of clearance should be delivered only to an aircraft unambiguously identified at the proper holding point and ready to line up.

comment 129 comment by: *Malta Air Traffic Controllers' Association*

1.4.10 Preparation for take off  
  
NEGATIVE, TAXI TO HOLDING POINT RUNWAY (NUMBER), [ INTERSECTION (designation or name of intersection)].  
Once the take off from intersection has been denied, it doesn't necessarily have to be from another intersection. therefore should be in square brackets.

response Not accepted  
The text is reflecting the continuation of the example given in the question and corresponds to the given situation of ‘...request for departure from an intersection take-off position’ and in the present case of ‘...denial of departure from an intersection take-off position’

comment 153 comment by: *René Meier, Europe Air Sports*

Page 49/77  
1.1.14 GNSS Service Status  
Remark: "Not available" would be easier to understand than "unavailable".

response Noted

comment 207 comment by: *EM-LPS*

*Comments in italics*  
**1.1 General**  
  
**1.1.1, 1.1.2**  
  
*According to AGC Briefing Note 5 – Radio Discipline<sup>1</sup>, paragraphs 11.1. and 11.2., certain*



differences from ICAO standards based on UK-CAA experience are recommended. In our opinion, differences listed below should be incorporated, like the recommendation c) from the briefing note which has been incorporated already.

- a) The word 'to' is to be omitted from messages relating to FLIGHT LEVELS.
- b) All messages relating to an aircraft's climb or descent to a HEIGHT or ALTITUDE employ the word 'to' followed immediately by the word HEIGHT or ALTITUDE. Furthermore, the initial message in any such RTF exchange will also include the appropriate QFE or QNH.

Sources:

<sup>1</sup> <http://www.skybrary.aero/bookshelf/books/113.pdf>

*The omission of the word "to" when issuing descent or climb clearances could be also the solution to avoid misunderstanding in communication and would be simpler to use for ATCOs than the previous option.*

DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS "(LEVEL)") a) FLIGHT LEVEL (number); or

b) ALTITUDE (number) METRES; or

c) ALTITUDE (number) FEET.

a) CLIMB (or DESCEND);

followed as necessary by:

1)  $\mp\Theta$  (level)

...

e) CONTINUE CLIMB (or DESCENT)  $\mp\Theta$  (level);

g) WHEN READY CLIMB (or DESCEND)  $\mp\Theta$  (level);

(ref. e.g.: <https://www.iata.org/whatwedo/safety/runway-safety/Documents/Phraseology-Report-ed-1-2011.pdf>)

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')	a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.
	Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.	
	...when passing level information in the form	d) (number) FEET (or METRES) ABOVE (or BELOW)



	of vertical distance from the other traffic	
<p>It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.</p> <p>Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:</p>		
2.1.8	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING; 5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type) 9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>

comment

260

comment by: AESA / DSANA

COMMENT	JUSTIFICATION
Add source reference: <b>(PANS-ATM 12.3.1)</b> and any other reference that applies when there are differences between AMC/GM and PANS-ATM 12.3.1 (as stated in following comments)	There is no source reference; <b>(PANS-ATM 12.3.1)</b> or any other applicable reference should be added.

response

Not accepted  
The structure of Chapter 12 of PANS ATM has been maintained and the table format allows easy referencing of the source material without inclusion of additional and potentially heavy detailed references.

comment

261

comment by: AESA / DSANA



COMMENT	JUSTIFICATION
<p>The entire "12.3.5 Coordination between ATS units" in PANS-ATM has not been included in this NPA.</p> <p>Is there any specific reason for that? Has it been agreed in <b>RMT.0148 (ATM.001)</b> Rulemaking Group?</p>	<p>The entire "12.3.5 Coordination between ATS units" in PANS-ATM has not been included in this NPA.</p> <p>If this requirement would finally be included, it should be placed between sections "1.4 Phraseologies for use on and in the vicinity of the aerodrome" and "1.5 Phraseologies to be used related to CPDLC".</p>

response

Not accepted

The SERA mandate is about 'rules of the air'. The criteria for 'rules of the air' have been decided by the drafting group and include 'collective action by more than only one category of aviation actors'. Therefore, the ground-ground (ATS-ATS) coordination has not been retained for transposition. It should normally be considered for Part-ATS.

comment

262

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<p><b>6. Appendices</b> <b>Appendix I</b> <b>1. ATC PHRASEOLOGIES</b> <b>1.1 General</b> <b>1.1.1 DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</b></p>	<p>There are some differences with the source document (<b>PANS-ATM 12.3.1</b>), as:</p> <ul style="list-style-type: none"> <li>- [HEIGHT] and [ALTITUDE] are not used in b) and c).</li> <li>- d) (number) FEET/METRES ABOVE (or [BELOW]) is not considered at all.</li> </ul> <p>Where do these differences come from? Have they been approved in <b>RMT.0148 (ATM.001)</b> Rulemaking Group? Otherwise, source reference should be specified.</p>	<p>The source reference, (<b>PANS-ATM 12.3.1</b>), does not include letter d) nor words in square parenthesis in b) and c).</p>





response Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

<p>1.1.1</p>	<p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</p> <p><i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.</p> <p>d) (number) FEET (or METRES) ABOVE (or BELOW)</p>
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It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on “passing level...” is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

<p>2.1.8</p>	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p>	<p>a) TRAFFIC (number) O'CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING; 5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type)</p>
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	<p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment

263

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<p><b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.2 LEVEL CHANGES, REPORTS AND RATES</p>	<p>Just to take into consideration: Two last phraseologies, z) and aa), are proposed to be deleted by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40, although the amendment is envisaged for applicability on 10 November 2016. In addition to that, it proposes to introduce new phraseologies, from z), aa) to kk).</p>	<p>Modifications in phraseology proposed by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40; amendment envisaged for applicability on 10 November 2016.</p>

response

Noted

The publication of the mentioned amendments will be carefully monitored and subsequently included in the next amendments of the rule.

comment

264

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<p><b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.3 MINIMUM FUEL</p>	<p>Include a separation line between 1.1.3 and 1.1.4, and consequently the note about "*" meaning.</p>	<p>Separation line between 1.1.3 and 1.1.4, and consequently note about "*" meaning are missing.</p>



response Accepted  
The table will be amended accordingly.

comment 265 comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.8 METEOROLOGICAL CONDITIONS	A new <b>letter p</b> ) is added which is not in the source document ( <b>PANS-ATM 12.3.1</b> ): p) INSTRUMENT METEOROLOGICAL CONDITIONS REPORTED (or forecast) IN THE VICINITY OF (location)  However, it comes from <b>PANS-ATM 11.4.3.2.1</b> , and this reference should be specified.	" <i>p) INSTRUMENT METEOROLOGICAL CONDITIONS REPORTED (or forecast) IN THE VICINITY OF (location)</i> " comes from <b>PANS-ATM 11.4.3.2.1</b> , and reference should be added.

response Accepted  
The reference will be added.

comment 266 comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.11 AERODROME INFORMATION	There are some differences with the source document ( <b>PANS-ATM 12.3.1</b> ), as: - "g) RUNWAY REPORT AT..." replaces " <b>ESTIMATED SURFACE FRICTION</b> " by " <b>BRAKING ACTION</b> " and adds a new grading (" <b>UNRELIABLE</b> ") for it, and the following optional text at the end: " <b>and/or BRAKING COEFFICIENT (equipment and number)</b> "; - " <b>i) BRAKING ACTION [(location) (measuring equipment used), RUNWAY (number), TEMPERATURE [MINUS] (number), WAS (reading) AT (time)]</b> " is new, not included in PANS-ATM; - "j) RUNWAY (or TAXIWAY) (number)..." replaces " <b>STANDING WATER</b> " by " <b>DAMP, WATER PATCHES,</b>	The source reference, ( <b>PANS-ATM 12.3.1</b> ), has some differences (explained in the left column) with this NPA point.



	<p><b>FLOODED (depth)", and deletes "WET ICE".</b></p> <p>Where do these differences come from? Have they been approved in <b>RMT.0148 (ATM.001)</b> Rulemaking Group? Otherwise, source reference should be specified.</p>	
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response

Accepted

The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:

g) RUNWAY REPORT AT (*observation time*) RUNWAY (*number*) (*type of precipitant*) UP TO (*depth of deposit*) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (*or* MEDIUM TO GOOD, *or* MEDIUM, *or* MEDIUM TO POOR, *or* POOR);

h) BRAKING ACTION REPORTED BY (*aircraft type*) AT (*time*) GOOD (*or* MEDIUM to GOOD, *or* MEDIUM, *or* MEDIUM to POOR, *or* POOR);

i) RUNWAY (*or* TAXIWAY) (*number*) WET [*or* STANDING WATER, *or* SNOW REMOVED (*length and width as applicable*), *or* TREATED, *or* COVERED WITH PATCHES OF DRY SNOW (*or* WET SNOW, *or* COMPACTED SNOW, *or* SLUSH, *or* FROZEN SLUSH, *or* ICE, *or* WET ICE, *or* ICE UNDERNEATH, *or* ICE AND SNOW, *or* SNOWDRIFTS, *or* FROZEN RUTS AND RIDGES)];

and paragraphs k) and l) being renumbered accordingly.

comment

267 comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<p><b>6. Appendices</b> <b>Appendix I</b> <b>1. ATC PHRASEOLOGIES</b> 1.1 General 1.1.13 REDUCED VERTICAL SEPARATION MINIMUM (RVSM) OPERATIONS</p>	<p>It is a minor difference, but <b>letters e) and f)</b> both include "TO" following "DUE", and "TO" is omitted in PANS-ATM. The phraseology in PANS-ATM is not exactly followed, and the standard should be followed, without differences.</p>	<p>The proposed text in NPA adds "TO" following "DUE": - *e) UNABLE RVSM DUE TO TURBULENCE; - *f) UNABLE RVSM DUE TO EQUIPMENT;</p>

response

Accepted

This editorial mistake will be corrected and the text will be amended in accordance with PANS ATM.

comment

268 comment by: AESA / DSANA



PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.14 GNSS SERVICE STATUS	It is a minor difference, but <b>letters e) and f)</b> both have shifted the order of <b>NAVIGATION</b> and <b>GNSS</b> words, with regard to the one in PANS-ATM, and in our opinion it was right in PANS-ATM. The phraseology in PANS-ATM is not exactly followed, and the standard should be followed, without differences.	The proposed text in NPA replaces " <b>GNSS NAVIGATION</b> " by " <b>NAVIGATION GNSS</b> ".

response Accepted  
 This editorial mistake will be corrected and the text will be amended in accordance with PANS ATM.

comment 269 comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.1 General 1.1.15 RNAV	This <b>point 1.1.15</b> does not exist in PANS-ATM, it comes from <b>ICAO Doc 7030 (SUPPS) EUR Reg. 10.1 RNAV</b> . This reference should be added.  However there are a few slight differences with it: - First phrase includes " <b>TO</b> " following " <b>DUE</b> ", and " <b>TO</b> " is omitted in <b>ICAO Doc 7030</b> . So, the phraseology in SUPPS is not exactly followed, and the standard should be followed, without differences. On the other hand, third phrase finishes the same way (" <b>DUE RNAV TYPE</b> "), and has not added " <b>TO</b> ", keeping the way it is in SUPPS. - Penultimate phrase in SUPPS, " <b>*(aircraft call sign) UNABLE RNAV DUE EQUIPMENT</b> ", has been ommitted. Is there any reason for it?	The reference for this point is missing, and there are a few differences with the source document ( <b>ICAO Doc 7030 (SUPPS)</b> ).

response Accepted  
 This editorial mistake will be corrected and the text will be amended in accordance with PANS ATM.

comment 270 comment by: AESA / DSANA



PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC <i>PHRASEOLOGIES</i> 1.2 Area control services 1.2.2 INDICATION OF ROUTE AND CLEARANCE LIMIT	Just for information: In <b>b) 3)</b> , "VIA" is proposed to be deleted by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40, although the amendment is envisaged for applicability on 10 November 2016. The Note in this same <b>b) 3)</b> point has been omitted: could it be because the referred <b>Chapter 4.5.7.2</b> may have been omitted in SERA Part C draft current version?	Slight modification in phraseology proposed by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40; amendment envisaged for applicability on 10 November 2016.

response

Noted

The publication of the mentioned amendments will be carefully monitored and subsequently included in the next amendment of the rule.

comment

271

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC PHRASEOLOGIES 1.2 Area control services 1.2.8 SEPARATION INSTRUCTIONS	Include the Note "'*' denotes pilot transmission." This Note should be in the same line as i) CONFIRM ZERO OFFSET.	The Note "'*' denotes pilot transmission." is missing.

response

Accepted

The text will be amended accordingly.

comment

272

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. ATC <i>PHRASEOLOGIES</i> 1.3 Approach control services 1.3.1 DEPARTURE	Just for information: several modifications are proposed by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40, although the amendment is envisaged for applicability on 10 November 2016: - in <b>f)</b> replace "VIA" by "DEPARTURE";	Some modifications in phraseology proposed by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40; amendment envisaged for applicability on 10 November 2016.



<i>INSTRUCTIONS</i>	- new points <b>g)</b> and <b>h)</b> for " <i>CLEARED DIRECT</i> ".	
response	<p>Noted</p> <p>The publication of the mentioned amendments will be carefully monitored and subsequently included in the next amendment of the rule.</p>	

comment	273	comment by: <i>AESA / DSANA</i>
response	<p>Noted</p> <p>The publication of the mentioned amendments will be carefully monitored and subsequently included in the next amendment of the rule.</p>	

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. <i>ATC PHRASEOLOGIES</i> 1.3 Approach control services 1.3.2 <i>APPROACH INSTRUCTIONS</i>	Just for information: several modifications are proposed by <b>ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40</b> , although the amendment is envisaged for applicability on 10 November 2016: - in <b>a)</b> replace " <i>VIA</i> " by " <i>ARRIVAL</i> "; - in <b>b)</b> and <b>c)</b> " <i>VIA</i> " has been deleted; - new <b>points d)</b> to <b>e)</b> for " <i>CLEARED DIRECT</i> "; - the rest have been renumbered.	Some modifications in phraseology proposed by <b>ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40</b> ; amendment envisaged for applicability on 10 November 2016.

comment	274	comment by: <i>AESA / DSANA</i>

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 1. <i>ATC PHRASEOLOGIES</i> 1.4 Phraseologies for use on and in the vicinity of the aerodrome 1.4.10 <i>PREPARATION FOR</i>	Some phraseology is added (after <b>k)</b> and the explanatory notes) which was not included in <b>ICAO Doc 4444 (PANS-ATM)</b> ; it is separated by a line from the previous ones, and since they seem to belong to <b>1.4.10</b> , no line is needed. And new bullets should be numbered continuing from <b>l)</b> .  Where does this new phraseology	Some phraseology is added (after <b>k)</b> and the explanatory notes) which was not included in <b>ICAO Doc 4444 (PANS-ATM)</b> .



<p><b>TAKE-OFF</b></p>	<p>come from? Has it been approved in <b>RMT.0148 (ATM.001)</b> Rulemaking Group? Otherwise, source reference should be specified.</p> <p>Since part of this phraseology applies to <b>ICAO Doc 7030 (SUPPS)</b> paragraph "<b>6.5.4 Visual departures</b>", which has not been considered in future SERA Part C, <b>requirements</b> concerning Aerodrome Operations and in particular, <b>Visual Departures should be included (ICAO Doc 7030 6.5.4)</b>. We propose to include the same requirements as in PANS-ATM "<b>6.5.4 Visual departures</b>", deleting "<i>by the appropriate authority</i>" in <b>6.5.4.3.a</b>), and replacing "<i>air traffic services (ATS) authority</i>" or "<i>ATS authority</i>" by "<i>ANSP</i>" in <b>6.5.4.3.b</b>) and <b>6.5.4.3.5</b>.</p>	<p><b>1.4.10 PREPARATION FOR TAKE-OFF</b>, includes phraseology for visual departures, but <b>no requirements</b> for such kind of operations <b>have been included</b> in SERA PART C draft current version.</p>
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response

Point 1: Accepted  
The table and the text will be amended accordingly.  
Point 2: Not accepted  
Phraseologies are put together in the present document, but they do not necessarily correspond in all cases to procedures detailed in the SERA implementing regulation. The present phraseologies constitute an AMC to SERA.14001 which reads: ‘Standardised phraseology shall be used in all situations for which it has been specified. Only when standardised phraseology cannot serve an intended transmission, plain language shall be used.’

comment

275

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<p><b>6. Appendices</b> <b>Appendix I</b> <b>2. ATS SURVEILLANCE SERVICE PHRASEOLOGIES</b> 2.1 General ATS surveillance service phraseologies <b>2.1.6 SPEED CONTROL</b></p>	<p>Reference [<b>PANS-ATM 4.6.3.2</b>] should be added.</p>	<p>The Note is not included in <b>PANS-ATM 12.4.1.6</b>, it comes from <b>PANS-ATM 4.6.3.2</b>, and this reference should be included.</p>

response

Partially accepted





The note presented in the NPA is the result of merging PANS ATM 4.6.3.2 and the associated note into one single note, as decided by the drafting group. The reference may be added to the records.

comment

276

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 2. <i>ATS SURVEILLANCE SERVICE PHRASEOLOGIES</i> 2.1 General ATS surveillance service phraseologies 2.1.6 <i>SPEED CONTROL</i>	Just for information: a new letter is proposed by <b>ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40</b> , although the amendment is envisaged for applicability on 10 November 2016: - <i>k) RESUME PUBLISHED SPEED</i> . Current <b>k)</b> would consequently be renumbered in that amendment.	<b>A new letter is proposed by ICAO Doc 4444 (PANS-ATM) State Letter AN 13/2.5-15/40;</b> amendment envisaged for applicability on 10 November 2016.

response

Noted

The publication of the mentioned amendments will be carefully monitored and subsequently included in the next amendment of the rule.

comment

277

comment by: AESA / DSANA

PART	COMMENT	JUSTIFICATION
<b>6. Appendices</b> <b>Appendix I</b> 6. <i>AIR TRAFFIC FLOW MANAGEMENT (ATFM)</i>	Add <b>ICAO Doc7030 (SUPPS) EUR Reg. 10.5 ATFM</b> as a reference.	The entire " <i>6. AIR TRAFFIC FLOW MANAGEMENT (ATFM)</i> " point is not included in PANS-ATM; it comes from <b>ICAO Doc 7030 (SUPPS) EUR Reg. 10.5 ATFM</b> , and this reference should be added.

response

Accepted  
The reference will be added.

comment

308

comment by: ENAV



There is a deviation from ICAO Doc 4444:

1.1.1 includes new a paragraph ("when passing level...") The new paragraph is not supported

In the English language the word "to" and "for" shall not be used in connection with assignment/reporting of levels. Based on current experience "to" and the number "2" might create confusion and leads to safety implications when assigning levels.

We recommend the development of a PAN-EUROPEAN Notification of Difference.

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

<p>1.1.1</p>	<p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</p> <p><i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.</p> <p>d) (number) FEET (or METRES) ABOVE (or BELOW)</p>
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It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on 'passing level...' is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

<p>2.1.8</p>	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p>	<p>a) TRAFFIC (number) O'CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING;</p>
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	<p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>4) CLOSING; 5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type) 9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 309 comment by: ENAV

1.1.8 includes new a paragraph ("information to a pilot...") The new paragraph is not supported

response Noted  
The paragraph is transposed from PANS ATM 11.4.3.2.1 without change.

comment 310 comment by: ENAV

1.1.10 (b),(e) + (f)  
When navigating on RNAV procedures distances in the FMS/PFD are usually given in relation TO the next waypoint. Consequently this should be mentioned in the phraseology and thus be subject to a pan-European difference

response Not accepted  
The current phraseology does not seem to contradict providing distance to the next way point. It should also be noted that ATC can ask for a distance from any way point/DME, not necessarily the next one by anyone. Any request for a deviation should be more detailed and explained. In the meantime, alternative means of compliance may be proposed with proper safety assessment.

comment 311 comment by: ENAV

1.1.11  
There is a deviation from ICAO Doc 4444 (12.3.1.11) add-ons and thus deviation from ICAO provisions are not supported

response Accepted  
The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:  
g) RUNWAY REPORT AT (observation time) RUNWAY (number) (type of precipitant) UP TO (depth of deposit) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR;  
  
h) BRAKING ACTION REPORTED BY (aircraft type) AT (time) GOOD (or MEDIUM to GOOD, or MEDIUM,



or MEDIUM to POOR, or POOR);

i) RUNWAY (or TAXIWAY) (number) WET [or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)];

and paragraphs k) and l) being renumbered accordingly.

comment	312	comment by: ENAV
	1.1.4	
	The Note is missing in the NPA 2015-14, an omission from ICAO provision is not supported	
response	Not accepted	
	The text of PAN ATM 12.3.1.4 was transposed without variation, including the note.	
comment	313	comment by: ENAV
	1.4.6 (d)	
	Proposal:	
	If multiple visibility and RVR observations are available, all values should be transmitted for take-off. Alternatively: If multiple visibility and RVR observations are available, the smallest value should be transmitted for take-off. and thus be subject to a pan-european difference	
response	Not accepted	
	Any request for a deviation should be more detailed and explained. In the meantime, alternative means of compliance may be proposed with proper safety assessment.	
comment	314	comment by: ENAV
	1.4.7 (a), (b) (d)	
	Recommend the inclusion of WTC “super” and to file a pan-european difference	
response	Not accepted	
	The issue of the use of the word ‘super’ is covered in SERA Part C (SERA.14065(a)(2) and (c)(2), and SERA.14090(c)) and that supersedes the phraseology described in 1.4.7 which reflects only the general case.	
comment	315	comment by: ENAV
	1.4.10	
	Preparation for take-off:, 2nd box These phraseologies are originated from ICAO Doc 7030. They are not formatted/numbered.	
	The purpose of Doc 7030 is to inform non-EU operators how the procedures in that region are. The mechanism of updating and maintaining Doc 7030 is different from other Docs. This will even complicate the future synchronisation effort and maintenance of SERA.	
response	Accepted	
	The text will be amended to include proper formatting.	



Noted for the second point.

comment	316	comment by: ENAV
	Chapter 2 Introduction refers to “the previous chapter” which has been left out from adoption into SERA AMC (phraseology for Air Traffic Services). Should be deleted.	
response	Not accepted The phraseology for air traffic services exists.	
comment	317	comment by: ENAV
	1.4.11 k) After departure...GEN12.3.4.11 As there is no specific time defined for ATFER DEPARTURE, the phrase WHEN AIRBORNE is used instead.	
	We recommend the development of a PAN-EUROPEAN Notification of Difference.	
response	Not accepted Any request for a deviation should be more detailed and explained. In the meantime, alternative means of compliance may be proposed with proper safety assessment. Additionally, using the phrase ‘when airborne’ does not indicate either if a turn must be initiated immediately or when reaching a certain level.	
comment	318	comment by: ENAV
	2.1.6 f) INCREASE (or REDUCE) SPEED TO (number) KILOMETRES PER HOUR (or KNOTS) [OR GREATER (or OR less)] In the English language the word “to” and “for” shall not be used in connection with assignment/reporting of speeds. Based on current experience “to” and the number “2” might create confusion and leads to safety implications when assigning speeds We recommend the development of a PAN-EUROPEAN Notification of Difference.	
response	Not accepted The proposal may have unintended consequences since PANS ATM describes phraseologies used worldwide. Any request for a deviation should be more detailed and assessed. In the meantime, alternative means of compliance may be proposed with proper safety assessment.	
comment	319	comment by: ENAV
	2.2.3 (b) Due to the fact, that a GBAS ground station is only available to transmit an approach course in accordance to a designed procedure via a defined FAS datablock, the course should be referenced to the procedure. GBAS based procedures are named „GLS“ APCH (according to ANNEX 10, ANNEX 6, Doc 8168 etc.). This inconsistency within ICAO Docs could be corrected by filing a pan-european difference if so commonly agreed.	
response	Not accepted	



Filing a difference would not be appropriate in this case; instead, corrective action should be initiated with ICAO. The case will be further investigated in that context and the results will be used accordingly.

comment	<p>330</p> <p>point 1.1.1 deviation from ICAO Doc 4444: 1.1.1 includes a new paragraph ("when passing level..."). This add-on is not subject to Doc 4444 and unnecessarily confuses the reference system for vertical distances (altitude/height/feet/FL).</p>	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
response	<p>Not accepted</p> <p>The new paragraph on 'passing level...' is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM.</p>	

comment	<p>331</p> <p>point 1.1.2 In the English language the word "to" and "for" shall not be used in connection with assignment/reporting of levels. Based on current experience "to" and the number "2" might create confusion and leads to safety implications when assigning levels. Germany notified a difference to the ICAO Doc 4444 provision. We recommend the development of a pan-european Notification of Difference.</p>	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>			
response	<p>Partially accepted</p> <p>The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; vertical-align: top;">1.1.1</td> <td style="width: 40%; vertical-align: top;"> <p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</p> <p><i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p> </td> <td style="width: 50%; vertical-align: top;"> <p>e) FLIGHT LEVEL (<i>number</i>); or f) [HEIGHT] (<i>number</i>) METRES; or g) [ALTITUDE] (<i>number</i>) FEET.</p> <p>h) (<i>number</i>) FEET (or METRES) ABOVE (or BELOW)</p> </td> </tr> </table>		1.1.1	<p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</p> <p><i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>e) FLIGHT LEVEL (<i>number</i>); or f) [HEIGHT] (<i>number</i>) METRES; or g) [ALTITUDE] (<i>number</i>) FEET.</p> <p>h) (<i>number</i>) FEET (or METRES) ABOVE (or BELOW)</p>
1.1.1	<p>DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')</p> <p><i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i></p> <p>...when passing level information in the form of vertical distance from the other traffic</p>	<p>e) FLIGHT LEVEL (<i>number</i>); or f) [HEIGHT] (<i>number</i>) METRES; or g) [ALTITUDE] (<i>number</i>) FEET.</p> <p>h) (<i>number</i>) FEET (or METRES) ABOVE (or BELOW)</p>			



It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

2.1.8	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING; 5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type) 9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 332 comment by: DFS Deutsche Flugsicherung GmbH

point 1.1.8  
1.1.8 includes a new paragraph p) ("information to a pilot...).  
Add-ons and thus deviation from ICAO provisions are not supported unless commonly agreed.

response Not accepted  
The paragraph is transposed from PANS ATM 11.4.3.2.1 without change.

comment 333 comment by: DFS Deutsche Flugsicherung GmbH

point 1.1.10 (b),(e) + (f)  
When navigating on RNAV procedures, distances in the FMS/PFD are usually given in relation TO the next waypoint. Consequently this should be mentioned in the phraseology and thus be subject to a pan-european difference.

response Not accepted  
The current phraseology does not seem to contradict providing distance to the next way



point. It should also be noted that ATC can ask for a distance from any way point/DME, not necessarily the next one by anyone. Any request for a deviation should be more detailed and explained. In the meantime, alternative means of compliance may be proposed with proper safety assessment.

comment	334	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	<p>point 1.1.11: includes a new paragraph i) ("BRAKING ACTION..."). Add-ons and thus deviation from ICAO provisions are not supported unless commonly agreed.</p>	
response	<p>Accepted</p> <p>The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or</i> MEDIUM TO GOOD, <i>or</i> MEDIUM, <i>or</i> MEDIUM TO POOR, <i>or</i> POOR);</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or</i> MEDIUM to GOOD, <i>or</i> MEDIUM, <i>or</i> MEDIUM to POOR, <i>or</i> POOR);</p> <p>i) RUNWAY (<i>or</i> TAXIWAY) (<i>number</i>) WET [<i>or</i> STANDING WATER, <i>or</i> SNOW REMOVED (<i>length and width as applicable</i>), <i>or</i> TREATED, <i>or</i> COVERED WITH PATCHES OF DRY SNOW (<i>or</i> WET SNOW, <i>or</i> COMPACTED SNOW, <i>or</i> SLUSH, <i>or</i> FROZEN SLUSH, <i>or</i> ICE, <i>or</i> WET ICE, <i>or</i> ICE UNDERNEATH, <i>or</i> ICE AND SNOW, <i>or</i> SNOWDRIFTS, <i>or</i> FROZEN RUTS AND RIDGES)];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>	
comment	335	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	<p>point 1.1.4 The <u>Note</u> is missing in the NPA 2015-14. An omission from ICAO provision is not supported.</p>	
response	<p>Noted</p> <p>The text of PAN ATM 12.3.1.4 was transposed without variation, including the note.</p>	
comment	336	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	<p>point 1.4.6 (d) Note: Proposal for a pan-european difference: If multiple visibility and RVR observations are available, all values should be transmitted for take-off. Alternatively: If multiple visibility and RVR observations are available, the smallest value should be transmitted for take-off.</p>	
response	<p>Not accepted</p> <p>Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment.</p>	
comment	337	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>





	point 1.4.7 (a), (b) (d) Recommend the inclusion of WTC “super” and to file a pan-european difference.
response	Not accepted The issue of the use of the word ‘super’ is covered in SERA Part C (SERA.14065(a)(2) and (c)(2), and SERA.14090(c)) and that supersedes the phraseology described in 1.4.7 which reflects only the general case.
comment	338 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span>  point 1.4.10 second box These phraseologies are originated from ICAO Doc 7030. They should be numbered "a), b) c)..” as well. It is not understood why the mechanism to change or not ICAO text is not applied here.  Furthermore, the purpose of Doc 7030 is to inform non-EU operators about the procedures in that region. The mechanism of updating and maintaining Doc 7030 is different from other Docs. This will even complicate the future synchronisation effort and maintenance of SERA.
response	Accepted The text will be amended to include proper formatting. Noted for the second point.
comment	339 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span>  2. Chapter 2 Introduction refers to “the sections above” which contains also the "coordination between ATS units" in Doc 4444 but has been left out from adoption into SERA AMC. In how far ist this note still meaningful in this context?
response	Noted The introductory note is considered meaningful in that it explains that the relevant phraseologies described in the previous sections are also applicable for the case when an ATS surveillance system is used in the provision of air traffic services. ‘Coordination between ATS units’ was not transposed since it was not considered part of the ‘rules of the air’.
comment	340 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span>  point 1.4.11: k) "After departure...." As there is no specific time defined for ATFER DEPARTURE, the phrase WHEN AIRBORNE is used instead. Germany notified a difference to the ICAO Doc 4444 provision. We recommend the development of a PAN-EUROPEAN Notification of Difference.
response	Not accepted Any request for a deviation should be more detailed and explained. In the meantime, alternative means of compliance may be proposed with proper safety assessment. Additionally, using the terms ‘when airborne’ does not indicate either if a turn must be initiated immediately or when reaching a certain level.



comment	<p>341 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span></p> <p>point 2.1.6 f) INCREASE (or REDUCE) SPEED TO (number) KILOMETRES PER HOUR (or KNOTS) [OR GREATER (or OR less)]</p> <p>In the English language the word “to” and “for” shall not be used in connection with assignment/reporting of speeds. Based on current experience “to” and the number “2” might create confusion and leads to safety implications when assigning speeds We recommend the development of a PAN-EUROPEAN Notification of Difference.</p>
response	<p>Not accepted</p> <p>The proposal may have unintended consequences since PANS ATM describes phraseologies used worldwide. Any request for a deviation should be more detailed and assessed. In the meantime, alternative means of compliance may be proposed with proper safety assessment.</p>
comment	<p>342 <span style="float: right;">comment by: <i>DFS Deutsche Flugsicherung GmbH</i></span></p> <p>point 2.2.3 (b) "you have crossed..."</p> <p>Due to the fact, that a GBAS ground station is only available to transmit an approach course in accordance to a designed procedure via a defined FAS datablock, the course should be referenced to the procedure. GBAS based procedures are named „GLS“ APCH (according to ANNEX 10, ANNEX 6, Doc 8168 etc.). This inconsistency within ICAO Docs could be corrected by filing a pan-european difference if so commonly agreed.</p>
response	<p>Not accepted</p> <p>Filing a difference would not be appropriate at this stage since work is ongoing at ICAO level to address the issue.</p>
comment	<p>350 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p><b>The AMC/GM related to SERA.14000 very often introduces new points that are not subject to Doc 4444.</b></p> <p>CANSO regrets that modifications to original ICAO text have not been commonly agreed in advance to drafting SERA. Deviations that are notified by individual member states or new suggestions for these AMC/GM that are made by single stakeholders should have been commonly discussed for their potential to become pan-European deviations.</p>
response	<p>Noted</p> <p>Apart from:</p> <ul style="list-style-type: none"> <li>— the current review of comments which may lead to changes; and</li> <li>— some editorial adaptations required by the transposition exercise,</li> </ul> <p>the provisions proposed in the NPA which are different from the content of Doc 4444 stem from:</p>



- differences agreed in the SERA Part C IR, or
- coming from recent ICAO updates, or
- Doc 7030.

A few changes are proposed on the basis of EANPG agreements to proposals for amendments.

comment	<p>352 <span style="float: right;">comment by: DGAC/DTA</span></p> <p>In appendix I, provision 1.1.11 of AMC1 SERA.14001 is copied from paragraph 12.3.1.11 of a former version of ICAO's PANS ATM (15<sup>th</sup> edition). Please, note that amendment 6 of this document has modified this paragraph.</p> <p>Therefore, DGAC proposes this provision should stick to the latest version of ICAO's PANS ATM.</p>
response	<p>Accepted</p> <p>The PANS ATM text has been updated and the text of AMC 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR</i>);</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR</i>);</p> <p>i) RUNWAY (<i>or TAXIWAY</i>) (<i>number</i>) WET [<i>or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)</i>];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>
comment	<p>353 <span style="float: right;">comment by: DGAC/DTA</span></p> <p>In points e) and f) of provision 1.1.14 of AMC1 SERA.14001, the terms "NAVIGATION GNSS" are used. However, the terms "GNSS NAVIGATION" are used in the equivalent provision of ICAO's PANS ATM (12.3.1.14).</p> <p>DGAC does not see the benefit of this inversion of terms and proposes to stick to the terms used in ICAO's phraseology.</p>
response	<p>Accepted</p> <p>This editorial mistake will be corrected and the text will be amended in accordance with PANS ATM.</p>
comment	<p>354 <span style="float: right;">comment by: DGAC/DTA</span></p> <p>In provision 1.1.15 of AMC1 SERA.14001, the terms "RNAV TYPE" are used, though they are not defined in ICAO's documentation. However, Doc 9613 defines the terms "NAVIGATION SPECIFICATION" which are more appropriate.</p>



	<p>Consequently, DGAC proposes to replace "RNAV TYPE" by "NAVIGATION SPECIFICATION" in the entire provision 1.1.15.</p>
response	<p>Not accepted</p> <p>When terms used in ICAO are not specifically defined, then the dictionary meaning should be used. In the present case, RNAV is defined in PANS ATM and the term 'type' is considered clear enough to convey the meaning. Additionally, the specific constraints of phraseology may explain why shorter terms are preferred. The terms used may be modified in the future as a result of decisions following works at global level.</p>
comment	<p>355 <span style="float: right;">comment by: DGAC/DTA</span></p> <p>In provision 1.1.16 of AMC1 SERA.14001, the generic term to use for area navigation is "RNAV" and not "RNP". Moreover, the pilot has the option to give the controller the reason for degradation of his/her aircraft navigation performance. However, the controller will probably not use this information and the pilot may waste time looking for the reasons to provide, while its workload may not allow him to do so. Moreover, the time taken to pass this information to the controller will extend the duration of communication on the channel, which should be avoided for safety reasons.</p> <p>For those reasons, DGAC proposes to write "UNABLE RNAV APPROACH [DUE TO EQUIPMENT FAILURE]".</p>
response	<p>Not accepted</p> <p>The reason for being 'unable' is shown between square brackets, which mean that it is an optional explanation. The phraseology in 1.1.16 offers the possibility to choose between 'RNP' and 'RNAV'" and it is believed that removing 'RNP' would reduce the scope, and for that more detailed justification would be required.</p>
comment	<p>361 <span style="float: right;">comment by: DGAC/DTA</span></p> <p>After provision 1.2.9, DGAC proposes to add a provision 1.2.10 about Holding clearances in Area Control Services.</p> <p>A provision for holding clearances is already written for Approach Control Services. However, in France, there are also holding patterns for Area Control Services in order to handle aircraft because of weather conditions and/or congestions on holding patterns used for Approach Control Services. In this context, DGAC proposes a phraseology for holding clearances be adopted like for approach control services.</p> <p>1.2.10</p> <p>a) PROCEED (significant point, name of facility or fix) [MAINTAIN (or CLIMB or DESCEND) (level)] HOLD [(direction)] AS PUBLISHED EXPECT (further clearance) AT (time) (additional instructions if necessary)</p> <p>*b) REQUEST HOLDING INSTRUCTIONS;</p> <p>c) PROCEED (significant point, name of facility or fix) [MAINTAIN (or CLIMB or DESCEND) (level)] HOLD [(direction)] [(specified) RADIAL, COURSE, INBOUND TRACK (three digits) DEGREES] [RIGHT (or LEFT) HAND PATTERN] [OUTBOUND TIME (number) MINUTES] EXPECT</p>



(further clearance) AT (time) (additional instructions, if necessary);

d) CLEARED TO THE (three digits) RADIAL OF THE (name) VOR AT (distance) DME FIX [MAINTAIN (or CLIMB or DESCEND TO) (level)] HOLD [(direction)] [RIGHT (or LEFT) HAND PATTERN] [OUTBOUND TIME (number) MINUTES] EXPECT (further clearance) AT (time) (additional instructions, if necessary);

e) CLEARED TO THE (three digits) RADIAL OF THE (name) VOR AT (distance) DME FIX [MAINTAIN (or CLIMB or DESCEND TO) (level)] HOLD BETWEEN (distance) AND (distance) DME [RIGHT (or LEFT) HAND PATTERN] EXPECT (further clearance) AT (time) (additional instructions, if necessary).

‘\*’ denotes pilot transmission.

response Not accepted  
The phraseologies associated with holding are already described in 1.3.3 and the relevant part of it can also be used by ACC.

comment 362 comment by: DGAC/DTA

In 1.3.2, DGAC proposes to add the 2 following items in order to address the case where the pilot flies an RNAV or RNP procedure:

y) report established on final track  
\*z) established on [final ] track

response Not accepted  
The SERA activity requires that relevant existing ICAO material be transposed into IR, AMC and GM. The development of new phraseologies requires further assessment and consultation. The subject of the proposed new phraseology may be considered if proposed to appropriate groups and may also be modified in the future as a result of decisions following works at global level. In the meantime, if necessary, alternative means of compliance may be proposed with proper safety assessment.

comment 363 comment by: DGAC/DTA

In 1.4.17, the terms "CIRCLE THE AERODROME" are misleading since the word "circling" is used elsewhere with specific meaning. In particular, this may be understood by the pilot as an instruction to execute a circling approach procedure and thus, bring confusion as regards what is really expected by ATC.

Therefore, DGAC expects further clarification on the matter.

response Not accepted  
The term ‘circle’ is not defined in PANS ATM and it is therefore assumed that the dictionary is to be used, namely ‘to surround or encompass with, or as with, a circle; to enclose in a circle’. Removing the term ‘circle’ would raise the question of the term to be used in replacement. Regarding the risk of confusion with ‘circling’, it should be noted that circling



involves other words such as 'circling to runway 06'.

comment	364	comment by: DGAC/DTA
	<p>In provisions 2.2.2 and 2.2.3, the terms GBAS/SBAS/MLS are used to specify the technics used to improve area navigation performance. However, DGAC thinks these terms should be replaced by generic terms, such as "final track" or "final course".</p> <p>For example, in point e), DGAC proposes to replace "report established on GBAS/SBAS/MLS Approach Course" by "Report established on final track".</p>	
response	<p>Not accepted</p> <p>Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment.</p>	
comment	365	comment by: DGAC/DTA
	<p>The Executive Director Decision issuing AMCs and GMs to SERA will be published on EASA's website only in English with no official translation provided elsewhere in other languages. Consequently, AMC1 SERA.14001 depicted in Appendix I will be provided only in English. Furthermore, the requirements for the language to be used in air-ground communications are set in SERA.14015, allowing Member States to use their national language in some cases. Consequently, in those cases Member States will not be able to apply the phraseology defined by AMC1 SERA.14001 since it is provided only in English. This raises the following question :</p> <p>Do Member States have to choose an alternative means of compliance (AltMOC) written in their national language to insure compliance with SERA.14001 when using their national language in air-ground communications?</p>	
response	<p>Noted</p> <p>SERA does not contain any provisions about the possibility to use alternative means of compliance (AltMoC). The lack of a procedural mechanism specifically foreseen for notification of AltMoC means that deviations from an AMC do not necessarily have to be notified to the Agency. However, the Member States are reminded of the obligations contained in Articles 5, 8 and 9 of Regulation (EU) No 923/2012 in which the provisions regarding the differences to ICAO, transitional and additional measures and safety requirements are contained.</p>	
comment	372	comment by: CAA-NL
	<p>Appendix I AMC1 SERA.14001 General 1. ATC PHRASEOLOGIES 1.1.2</p> <p>It is well understood that standard phraseology reduces the risk that a message will be misunderstood and aids the read-back/hear-back process so that any error is quickly</p>	



detected. Ambiguous phraseology is a frequent causal or contributory factor in aircraft accidents and incidents.

The question of whether to say, 'TO' addresses the concern about misunderstanding and/or ambiguity. It does not seem sensible to promote a situation where it may be possible to confuse the words 'two' and 'to'.

It is known that a number of States have already published differences to the ICAO phraseology on this topic, prohibiting the use of 'TO' when giving level clearances.

The topic is also being addressed in the APDSG (APDSG66) with the intention being to propose a change to PANS ATM.

A possible option that has been proposed in the past is to mandate the use of the words 'altitude', 'height' or 'flight level' before saying the actual number. While this does partly mitigate the issue, it does not solve the problems of:

- o when there is a poor frequency quality due to garbling or noise, parts of the message e.g. 'flight level' may be missed, or;
- o when an ATCO, for whatever reason - stress, lapse, laziness, workload etc., omits the words 'flight level' and gives a clearance, 'Speedbird 123 Climb to Two Zero'.

· Furthermore, for area's with dens traffic, R/T messages need to be condensed without leading to misunderstanding.

For this reason it is recommended to include the following text in the Appendix: In the English language the words 'TO' may be refrained from when used in connection with the assignment or reporting of flight levels specifically in cases where a misunderstanding between the words TO and TWO may occur.

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')	a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.
	Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.	
	...when passing level information in the form of vertical distance from the other traffic	d) (number) FEET (or METRES) ABOVE (or BELOW)

It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety



assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

2.1.8	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN;</p> <p>2) SLOW MOVING;</p> <p>3) FAST MOVING;</p> <p>4) CLOSING;</p> <p>5) OPPOSITE (or SAME) DIRECTION;</p> <p>6) OVERTAKING;</p> <p>7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT);</p> <p>8) (aircraft type)</p> <p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment

376

comment by: *HungaroControl*

...issuing multiple line-up information

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

Comment:

According to PANS-ATM 5.10.1.1. and 5.10.1.2, essential traffic information shall be given when a controlled flight is not or will not be separated from other controlled traffic by the appropriate separation minima. Essential local traffic information (PANS-ATM 7.4.1.3.) seems to be more appropriate here.

response

Accepted

The comment is justified and the text will be amended accordingly to read:

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

Additionally, it is considered that corrective action should be initiated with ICAO/EANPG.

comment

381

comment by: *Finavia*

Appendix I - ATC Phraseologies section is partly obsolete/outdated. It does not contain changes of Amendment 6 to PANS-ATM (resulting from a change to Annex 14) e.g. "Estimated surface friction (ESF)". Those changes have become applicable already





response	<p>13.11.2014 and they have been implemented in several states.</p> <p>Accepted</p> <p>The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or</i> MEDIUM TO GOOD, <i>or</i> MEDIUM, <i>or</i> MEDIUM TO POOR, <i>or</i> POOR);</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or</i> MEDIUM to GOOD, <i>or</i> MEDIUM, <i>or</i> MEDIUM to POOR, <i>or</i> POOR);</p> <p>i) RUNWAY (<i>or</i> TAXIWAY) (<i>number</i>) WET [<i>or</i> STANDING WATER, <i>or</i> SNOW REMOVED (<i>length and width as applicable</i>), <i>or</i> TREATED, <i>or</i> COVERED WITH PATCHES OF DRY SNOW (<i>or</i> WET SNOW, <i>or</i> COMPACTED SNOW, <i>or</i> SLUSH, <i>or</i> FROZEN SLUSH, <i>or</i> ICE, <i>or</i> WET ICE, <i>or</i> ICE UNDERNEATH, <i>or</i> ICE AND SNOW, <i>or</i> SNOWDRIFTS, <i>or</i> FROZEN RUTS AND RIDGES)];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>
comment	<p>384 <span style="float: right;">comment by: ENAV</span></p> <p><b>The AMC/GM related to SERA.14000 very often introduces new points that are not subject to Doc 4444.</b></p> <p>CANSO regrets that modifications to original ICAO text have not been commonly agreed in advance to drafting SERA.</p> <p>Deviations that are notified by individual member states or new suggestions for these AMC/GM that are made by single stakeholders should have been commonly discussed for their potential to become pan-European deviations.</p>
response	<p>Noted</p> <p>Apart from:</p> <ul style="list-style-type: none"> <li>— the current review of comments which may lead to changes; and</li> <li>— some editorial adaptations required by the transposition exercise,</li> </ul> <p>the provisions proposed in the NPA which are different from the content of Doc 4444 stem from:</p> <ul style="list-style-type: none"> <li>• differences agreed in the SERA Part C IR, or</li> <li>• coming from recent ICAO updates, or</li> <li>• Doc 7030.</li> </ul> <p>A few changes are proposed on the basis of EANPG agreements to proposals for amendments.</p>
comment	<p>425 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 40</p> <p><b>Paragraph No:</b> AMC1 SERA.14001 General para 1.1.2</p>



**Comment:**

The UK CAA suggests that the word “TO” in these examples is not considered to add any value to the ATC instruction and as it is used frequently it adds to RTF loading in busy airspaces.

**Justification:**

Increased controller workload.

**Proposed Text:**

“1.1.2 Level Changes Reports and Rates

a) CLIMB (or DESCEND);

followed as necessary by;

1) (LEVEL)

2) AND MAINTAIN BLOCK (level) TO (level)”

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS ‘(LEVEL)’)  <i>Note.— In circumstances where clarification is required the word ‘ALTITUDE’ or ‘HEIGHT’ may be included, e.g. ‘DESCEND TO ALTITUDE TWO THOUSAND FEET’.</i>  ...when passing level information in the form of vertical distance from the other traffic	a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.   d) (number) FEET (or METRES) ABOVE (or BELOW)
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It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:



<p>2.1.8</p>	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN;</p> <p>2) SLOW MOVING;</p> <p>3) FAST MOVING;</p> <p>4) CLOSING;</p> <p>5) OPPOSITE (or SAME) DIRECTION;</p> <p>6) OVERTAKING;</p> <p>7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT);</p> <p>8) (aircraft type)</p> <p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment

426

comment by: UK CAA

**Page No:** 42

**Paragraph No:** AMC1 SERA.14001 Appendix I General para 1.1.4

**Comment:**

The UK CAA suggests that normal instruction would be “CONTACT (unit callsign) (frequency)”.

Interpretation of “STANDBY” is for the pilot to wait for further instructions on the current channel. “STANDBY FOR” has the potential for an aircraft to not change channel but to remain on current channel and wait until instructed to change channel to the new unit and frequency.

**Justification:**

Unintended consequence.

response

Noted

This point has been identified as having a potential for improvement and some works have been initiated and carried out by EUROCONTROL/APDSG. However, considering other ongoing developments, no proposal for amendment of PANS ATM has been decided yet and it is proposed to keep the ICAO options as they currently are.

comment

427

comment by: UK CAA

**Page No:** 44

**Paragraph No:** AMC1 SERA.14001 Appendix I General para 1.1.8

**Comment:**



	<p>The UK CAA seeks clarification of how wind information is to be expressed if the wind is calm.</p> <p><b>Justification:</b> Clarification.</p>
response	<p>Not accepted</p> <p>There is no formal contradiction when considering that the phrase ‘wind is expressed’ means that there is some wind and on the contrary, ‘no wind’ may be expressed by ‘calm’.</p>
comment	<p>428 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 47</p> <p><b>Paragraph No:</b> AMC1 SERA.14001 Appendix I General para 1.1.11</p> <p><b>Comment:</b> Paragraphs g) &amp; h) were amended in PANS-ATM amendment 6. Paragraph i) was deleted in PANS-ATM amendment 6</p> <p><b>Justification:</b> Incorrect transposition.</p>
response	<p>Accepted</p> <p>The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:</p> <p>g) RUNWAY REPORT AT (<i>observation time</i>) RUNWAY (<i>number</i>) (<i>type of precipitant</i>) UP TO (<i>depth of deposit</i>) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (<i>or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR</i>;</p> <p>h) BRAKING ACTION REPORTED BY (<i>aircraft type</i>) AT (<i>time</i>) GOOD (<i>or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR</i>);</p> <p>i) RUNWAY (<i>or TAXIWAY</i>) (<i>number</i>) WET [<i>or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)</i>];</p> <p>and paragraphs k) and l) being renumbered accordingly.</p>
comment	<p>429 <span style="float: right;">comment by: UK CAA</span></p> <p><b>Page No:</b> 74</p> <p><b>Paragraph No:</b> AMC1 SERA.14001 Appendix I General para 2.3.9</p> <p><b>Comment:</b> The UK CAA advises that A7700 is the emergency code and covers Mayday and Pan situations. Therefore ATC ask pilot to squawk emergency and not Mayday.</p> <p><b>Justification:</b> Incorrect terminology.</p>



	<p><b>Proposed Text:</b> “2.3.9 TO REQUEST EMERGENCY CODE  SQUAWK EMERGENCY [CODE SEVEN-SEVEN-ZERO-ZERO].”</p>
response	<p>Not accepted Although the comment is understood, it is considered that no deviation from ICAO should be introduced on such a sensitive subject. Instead, an amendment to PANS ATM should be proposed to ensure common understanding at global level.</p>
comment	<p>431 <span style="float: right;">comment by: <i>CANSO</i></span>  There is a deviation from ICAO Doc 4444:  1.1.1 includes new a paragraph ("when passing level...") The new paragraph is not supported</p>
response	<p>Not accepted The new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM.</p>
comment	<p>432 <span style="float: right;">comment by: <i>CANSO</i></span>  1.1.8 includes new a paragraph ("information to a pilot...") The new paragraph is not supported</p>
response	<p>Not accepted The paragraph is transposed from PANS ATM 11.4.3.2.1 without change.</p>
comment	<p>433 <span style="float: right;">comment by: <i>CANSO</i></span>  1.1.10 (b),(e) + (f) When navigating on RNAV procedures distances in the FMS/PFD are usually given in relation TO the next waypoint. Consequently this should be mentioned in the phraseology and thus be subject to a pan-European difference</p>
response	<p>Not accepted The current phraseology does not seem to contradict providing distance to the next way point. It should also be noted that ATC can ask for a distance from any way point/DME, not necessarily the next one by anyone. Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment.</p>
comment	<p>434 <span style="float: right;">comment by: <i>CANSO</i></span>  1.1.11 There is a deviation from ICAO Doc 4444 (12.3.1.11) add-ons and thus deviation from ICAO provisions are not supported</p>
response	<p>Accepted</p>



The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:

g) RUNWAY REPORT AT (*observation time*) RUNWAY (*number*) (*type of precipitant*) UP TO (*depth of deposit*) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (*or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR*);

h) BRAKING ACTION REPORTED BY (*aircraft type*) AT (*time*) GOOD (*or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR*);

i) RUNWAY (*or TAXIWAY*) (*number*) WET [*or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)*];

and paragraphs k) and l) being renumbered accordingly.

comment	435	comment by: CANSO
	1.1.4	
	The Note is missing in the NPA 2015-14, an omission from ICAO provision is not supported	
response	Not accepted	
	The text of PAN ATM 12.3.1.4 was transposed without variation, including the note.	
comment	436	comment by: CANSO
	1.4.6 (d)	
	Proposal:	
	If multiple visibility and RVR observations are available, all values should be transmitted for take-off. Alternatively: If multiple visibility and RVR observations are available, the smallest value should be transmitted for take-off. and thus be subject to a pan-european difference	
response	Not accepted	
	Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment.	
comment	437	comment by: CANSO
	1.4.7 (a), (b) (d)	
	Recommend the inclusion of WTC “super” and to file a pan-european difference	
response	Not accepted	
	The issue of the use of the word ‘super’ is covered in SERA Part C (SERA.14065(a)(2) and (c)(2) and SERA.14090(c)) and that supersedes the phraseology described in 1.4.7 which reflects only the general case.	
comment	438	comment by: CANSO
	1.4.10	
	Preparation for take-off:, 2nd box These phraseologies are originated from ICAO Doc 7030.	



	<p>They are not formatted/numbered.</p> <p>The purpose of Doc 7030 is to inform non-EU operators how the procedures in that region are. The mechanism of updating and maintaining Doc 7030 is different from other Docs. This will even complicate the future synchronisation effort and maintenance of SERA.</p>
response	<p>Accepted</p> <p>The text will be amended to include proper formatting.</p> <p>Noted for the second point.</p>
comment	<p>439 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>Chapter 2 Introduction refers to “the previous chapter” which has been left out from adoption into SERA AMC (phraseology for Air Traffic Services). Should be deleted.</p>
response	<p>Not accepted</p> <p>The phraseology for air traffic services exists.</p>
comment	<p>440 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>1.4.11</p> <p>k) After departure....GEN12.3.4.11 As there is no specific time defined for ATFER DEPARTURE, the phrase WHEN AIRBORNE is used instead.</p> <p>We recommend the development of a PAN-EUROPEAN Notification of Difference.</p>
response	<p>Not accepted</p> <p>Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment. Additionally, using the phrase ‘when airborne’ does not indicate either if a turn must be initiated immediately or when reaching a certain level.</p>
comment	<p>441 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>2.1.6</p> <p>f) INCREASE (or REDUCE) SPEED TO (number) KILOMETRES PER HOUR(or KNOTS) [OR GREATER (or OR less)]</p> <p>In the English language the word “to” and “for” shall not be used in connection with assignment/reporting of speeds. Based on current experience “to” and the number “2” might create confusion and leads to safety implications when assigning speeds</p> <p>We recommend the development of a PAN-EUROPEAN Notification of Difference.</p>
response	<p>Not accepted</p> <p>The proposal may have unintended consequences since PANS ATM describes phraseologies used worldwide. Any request for a deviation should be more detailed and assessed. In the meantime, alternative means of compliance may be proposed with proper safety assessment.</p>
comment	<p>442 <span style="float: right;">comment by: <i>CANSO</i></span></p> <p>2.2.3 (b)</p> <p>Due to the fact, that a GBAS ground station is only available to transmit an approach course</p>



in accordance to a designed procedure via a defined FAS datablock, the course should be referenced to the procedure. GBAS based procedures are named „GLS“ APCH (according to ANNEX 10, ANNEX 6, Doc 8168 etc.). This inconsistency within ICAO Docs could be corrected by filing a pan-european difference if so commonly agreed.

response

Not accepted  
Filing a difference would not be appropriate in this case; instead, corrective action should be initiated with ICAO. The case will be further investigated in that context and the results will be used accordingly.

comment

444

comment by: CANSO

In the English language the word “to” and “for” shall not be used in connection with assignment/reporting of levels. Based on current experience “to” and the number “2” might create confusion and leads to safety implications when assigning levels.  
We recommend the development of a PAN-EUROPEAN Notification of Difference.

response

Partially accepted  
The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')	a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.
	<i>Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.</i>	
	...when passing level information in the form of vertical distance from the other traffic	d) (number) FEET (or METRES) ABOVE (or BELOW)

It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on ‘passing level...’ is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below





will be added to 2.1.8:

2.1.8	<p>TRAFFIC INFORMATION AND AVOIDING ACTION</p> <p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>a) TRAFFIC (number) O’CLOCK (distance) (direction of flight) [any other pertinent information]:</p> <p>1) UNKNOWN;</p> <p>2) SLOW MOVING;</p> <p>3) FAST MOVING;</p> <p>4) CLOSING;</p> <p>5) OPPOSITE (or SAME) DIRECTION;</p> <p>6) OVERTAKING;</p> <p>7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT);</p> <p>8) (aircraft type)</p> <p>9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 446 comment by: Avinor Air Navigation Services (Avinor Flysikring AS)

In para. 1.1.11 the phrases to be used should be aligned with the prases in PANS-ATM para. 12. 3.1.11 as reflected in amendment 6 to PANS-ATM.

response Accepted

The PANS ATM text has been updated and the text of 1.1.11 will be amended with the former paragraphs g), h), i) and j) being replaced by:

g) RUNWAY REPORT AT (observation time) RUNWAY (number) (type of precipitant) UP TO (depth of deposit) MILLIMETRES. ESTIMATED SURFACE FRICTION GOOD (or MEDIUM TO GOOD, or MEDIUM, or MEDIUM TO POOR, or POOR);

h) BRAKING ACTION REPORTED BY (aircraft type) AT (time) GOOD (or MEDIUM to GOOD, or MEDIUM, or MEDIUM to POOR, or POOR);

i) RUNWAY (or TAXIWAY) (number) WET [or STANDING WATER, or SNOW REMOVED (length and width as applicable), or TREATED, or COVERED WITH PATCHES OF DRY SNOW (or WET SNOW, or COMPACTED SNOW, or SLUSH, or FROZEN SLUSH, or ICE, or WET ICE, or ICE UNDERNEATH, or ICE AND SNOW, or SNOWDRIFTS, or FROZEN RUTS AND RIDGES)];

and paragraphs k) and l) being renumbered accordingly.

comment 488 comment by: European Cockpit Association

The transposition of the ICAO provisions in from Annex 10 and PANS-ATM, including the exemplary standard phraseologies, is supported from the harmonisation perspective.

response Noted



comment

514

comment by: ENAC Italy

There is a deviation from ICAO Doc 4444:

1.1.1 includes new a paragraph ("when passing level...) The new paragraph is not supported

Justification: In the English language the word "to" and "for" should not be used in connection with assignment/reporting of levels. Based on current experience "to" and the number "2" might create confusion and leads to safety implications when assigning levels.

response

Partially accepted

The general subject of the description of levels in phraseology is implemented in various manners in Europe, sometimes with published differences, and for that reason some works have already been initiated in order to find a harmonised solution. In this context, the question is now addressed globally by the ICAO ATM OPS Panel and although it has not reached a final conclusion yet, the current NPA proposal shown at Appendix I - 1.1.1 is considered consistent with the solution which is likely to be adopted at ICAO level. However, the NPA proposal will be slightly amended as follows to better reflect the future expected consensus:

1.1.1	DESCRIPTION OF LEVELS (SUBSEQUENTLY REFERRED TO AS '(LEVEL)')	a) FLIGHT LEVEL (number); or b) [HEIGHT] (number) METRES; or c) [ALTITUDE] (number) FEET.   d) (number) FEET (or METRES) ABOVE (or BELOW)
	Note.— In circumstances where clarification is required the word 'ALTITUDE' or 'HEIGHT' may be included, e.g. 'DESCEND TO ALTITUDE TWO THOUSAND FEET'.	
	...when passing level information in the form of vertical distance from the other traffic	

It is believed that this solution with square brackets in b) and c) also provides the benefit of flexibility in the way it may be used. Additionally, and although harmonised phraseology is the preferred option, alternative means of compliance may be proposed with proper safety assessment.

Regarding 1.1.1 - d), the new paragraph on 'passing level...' is the result of works coordinated at European level, accepted by EANPG57 in November 2015 (Appendix L) and now subject of a formal proposal to ICAO for amendment of PANS ATM. Additionally, in order to be aligned with the proposal adopted by ICAO/EANPG 57, the text highlighted yellow in the table below will be added to 2.1.8:

2.1.8	TRAFFIC INFORMATION AND AVOIDING ACTION	a) TRAFFIC (number) O'CLOCK (distance) (direction of flight) [any other pertinent information]:  1) UNKNOWN; 2) SLOW MOVING; 3) FAST MOVING; 4) CLOSING;
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	<p>...(if known)</p> <p>...when passing level information to aircraft climbing or descending, in the form of vertical distance from the other traffic</p>	<p>5) OPPOSITE (or SAME) DIRECTION; 6) OVERTAKING; 7) CROSSING LEFT TO RIGHT (or RIGHT TO LEFT); 8) (aircraft type) 9) (level)</p> <p>10) [YOUR CLEARED LEVEL]</p> <p>11) CLIMBING (or DESCENDING)</p>
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comment 515 comment by: ENAC Italy

1.4.6 (d)  
Proposal:

If multiple visibility and RVR observations are available, all values should be transmitted for take-off.

Alternatively: If multiple visibility and RVR observations are available, the smallest value should be transmitted for take-off.

This should be subject to a pan-european difference

response Not accepted  
Any request for a deviation should be more detailed and justified. In the meantime, alternative means of compliance may be proposed with proper safety assessment.

comment 516 comment by: ENAC Italy

1.4.7 (a), (b) (d)  
Recommend the inclusion of WTC “super” and to file a pan-european difference

Justification: In Italy the "Super" category is used with a good service experience. We believe that this category should be introduced or, alternatively, phraseology should not prevent the use of this category, in consideration taht no requirement has been introduced in SERA.

response Not accepted  
The issue of the use of the word ‘super’ is covered in SERA Part C (SERA.14065(a)(2) and (c)(2) and SERA.14090(c)) and that supersedes the phraseology described in 1.4.7 which reflects only the general case.



## 3. Attachments



BELGIUM and G.-D.  
LUXEMBOURG  
See cover page for details.

PDF Help

AIP | AMDT | AIRAC | SUPs | AICs

Effective 12 NOV 2015

- Part 1 GENERAL (GEN)

+ GEN 0 INTRODUCTION

+ GEN 1 NATIONAL REGULATIONS AND REQUIREMENTS

+ GEN 2 TABLES AND CODES

+ GEN 3 SERVICES

+ GEN 4 CHARGES

- Part 2 EN-ROUTE (ENR)

+ ENR 0 INTRODUCTION

+ ENR 1 GENERAL RULES AND PROCEDURES

+ ENR 2 AIR TRAFFIC SERVICES AIRSPACE

+ ENR 3 ATS ROUTES

+ ENR 4 RADIO NAVIGATION AIDS / SYSTEMS

+ ENR 5 NAVIGATION WARNINGS

+ ENR 6 EN-ROUTE CHARTS

- Part 3 AERODROME (AD)

+ AD 0 INTRODUCTION

+ AD 1 AERODROMES/HELIPORTS - INTRODUCTION

- AD 2 AERODROMES

+ EBAW ANTWERPEN / Deurne

- EBBR BRUSSELS / Brussels-National

AD 2.1 EBBR AERODROME LOCATION INDICATION

AD 2.2 EBBR AERODROME GEOGRAPHICAL AND

AD 2.3 EBBR OPERATIONAL HOURS

AD 2.4 EBBR HANDLING SERVICES AND FACILITIES

AD 2.5 EBBR PASSENGER FACILITIES

AD 2.6 EBBR RESCUE AND FIRE FIGHTING SERVICES

AD 2.7 EBBR SEASONAL AVAILABILITY - CLEARING

AD 2.8 EBBR APRONS, TAXIWAYS AND CHECK L

AD 2.9 EBBR SURFACE MOVEMENT GUIDANCE

AD 2.10 EBBR AERODROME OBSTACLES

AD 2.11 EBBR METEOROLOGICAL INFORMATION

AD 2.12 EBBR RUNWAY PHYSICAL CHARACTERISTICS

AD 2.13 EBBR DECLARED DISTANCES

AD 2.14 EBBR APPROACH AND RUNWAY LIGHTING

## 2 TAXI REGULATIONS

### 2.1 GENERAL

Pilots are advised to consult chart [AD 2 EBBR-MISC 06](#), depicting the hot spots on the manoeuvring area.

Between 2200 and 0459, taxi restrictions apply (see [EBBR AD 2.21, § 2.1](#)).

### 2.2 USE OF STOPBARS

Stopbars at entry points of active **RWY** are operated permanently. Due to operational requirements and practices, the stopbar at **RWY** entry point P9 will remain off when configuration **RWY 01/07R** is used.

Aircraft and vehicles shall never cross a lit stopbar.

When a lit stopbar cannot be cycled, the **RWY** entry point will be taken out of service and aircraft and vehicles will be rerouted. If rerouting is not possible, **ATC** will clear the aircraft or vehicle to cross a lit stopbar, stating the reason why the stopbar remains lit in each individual clearance.

When stopbars for all **RWY** entry points of one or more **RWY** cannot be lit, this shall be announced via **RTF** and **ATIS**, as well as via **NOTAM** if the outage is estimated to occur for a period of at least two hours.

Pilots are reminded that when stopbars are not lit, this does not constitute an authorisation of any kind to enter a **RWY**, irrespective if this **RWY** is active or not. An explicit clearance or instruction to enter or cross any **RWY** is required.

### 2.3 STANDARD TAXI ROUTES

#### 2.3.1 GENERAL

Aircraft requiring full length for departure shall advise **GND** at the latest when requesting taxi clearance.

Arriving aircraft shall remain on **TWR** frequency until instructed to contact **GND**.

Ground operations are controlled by two sectors: **GND North** and **GND South** (see chart [AD 2 EBBR-MISC 05](#)). Transfer of control and communication point between **GND N** and **GND S** is **TWY INN 8** or **OUT 8**.

Aircraft will be transferred to the appropriate **TWR** frequency to enter or cross an active runway. An explicit clearance to cross or enter any runway shall be issued by **ATC**. If no such clearance is received, pilots shall obtain it from **ATC** before

Attachment #1 to comment [#42](#)