



**CANSO Position Paper on
the Pilot Common
Project**

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1. Introduction

The draft PCP IR, together with a consultation paper that proposes the EC's way forward for the establishment of the Deployment Manager (DM), was issued by the EC on 2nd December 2013 as an input to the SSC in mid-Dec 2013 and is subject to a consultation process among the operational stakeholders, with the objective to have a formal approval at the SSC in April 2014.

CANSO acknowledges and fully supports the efforts of the European Commission to assist in the deployment of new ATM capabilities and has reviewed the supporting PCP consultation material. CANSO members will individually review and provide detailed comments on individual AF elements. Below are key general comments from CANSO on the PCP.

2. Goal of the Position Paper

There is general concern that a precise binding regulation would be difficult to manage, because of developments in detailed specifications. The feasibility of the deployment plan of the ATM functionalities (AFs) and relevant CBAs of the PCP is still unclear. Detailed specifications and standards are not always available on time, in order to start production (this is outside of SJU scope). It is essential to identify those elements within AF 1 to 4 that should be more appropriately regarded as "binding orientations" rather than binding regulations.

For this purpose, CANSO has tried to identify such items within the PCP that still do not have proven relevant performance gain and/or could not be ready on time for its deployment (as can be found in the annex).

Due to this fact, CANSO believes there is a need for a function to ensure, that only mature elements will be deployed under the binding umbrella of the PCP IR. This function shall be provided by the Deployment Manager and shall be clearly described by the PCP IR.

3. Uncertainties within the PCP

CANSO considers that there are varying degrees of maturity across the AFs including less mature elements in AF1-4 as well as some more mature elements in the AFs 5 & 6.

CANSO has encountered as one of the main uncertainties the Cost Benefit Analysis presented by the EC. The CBA is based on a full deployment of AF 1-6

and has not considered the various deployment scenarios whether "binding orientations" should be taken into account or not.

4. CANSO Proposal

Based on experiences with interoperability regulations (Data-link, ADQ), the need for flexibility provisions has been demonstrated due to uncertainties in the validation and industrialisation phase, the regulatory material and the availability of standards.

Within each of the AFs, the more mature elements can become binding regulations whilst the less mature elements should become binding orientations, all of them remaining within the PCP.

CANSO has identified those elements which have more uncertainties and therefore are less mature to become binding. The list of elements provided by CANSO and the rationale, can be found in the annex to this Position Paper.

CANSO believes that the impact of PCP prerequisites should also be considered when reviewing the draft PCP IR. In particular, the already known delays in IDP implementation impacting the PCP and additional PCP pre-requisites that may have not been included in the IDP and therefore not closely monitored should be analysed.

CANSO considers that it is crucial for the correct deployment of the PCP to have the "flexibility" to develop and manage a deployment programme that delivers clear performance benefits at the right time in the right place based on mature capabilities.

In this line:

CANSO suggests that the Deployment Manager (DM) when preparing the Deployment programme reassesses and clarifies the geographical scope (as in article 11 regulation 409/2013).

CANSO proposes that the deployment CBA for each AF must be critically reviewed and updated on an annual basis to ensure the effective delivery of performance benefits at Network level. To this end it is anticipated that the Commission will retain a certain level of flexibility when reviewing delivery of the PCP-IR.

CANSO suggests the following to the PCP IR:

"According to IR 409/2013, the DM shall manage the deployment of the PCP. It shall ensure that only mature elements of the PCP are deployed. In all other

cases (not-mature elements, unmet binding targets and fundamental changes in assumptions), the DM shall propose adapted targets to the EC, enabling changes to the PCP IR towards the most beneficial deployment from a network perspective.”

CANSO reiterates that there is a need for a balanced approach between long term investments and the requirements of the performance scheme.

CANSO reiterates that financial incentives should be used to support and encourage investments. All elements within the PCP should be eligible for incentives within implementation projects.

5. Timescale of the Consultation

Some CANSO members have noted that they were not involved in the development of the PCP and have had serious difficulties to review its content in the time provided by the EC.

6. Endorsement

CANSO requires clarification to the endorsement procedure.

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CANSO – the Civil Air Navigation Services Organisation – is the global voice of air navigation service providers (ANSPs) worldwide. CANSO Members support over 85% of world air traffic. Members share information and develop new policies, with the ultimate aim of improving air navigation services (ANS) on the ground and in the air. CANSO represents its Members’ views in major regulatory and industry forums, including at ICAO, where it has official Observer status. CANSO has an extensive network of Associate Members drawn from across the aviation industry.

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ANNEX

CANSO proposes that the maturity of AFs1-4 is reassessed and to only make binding those elements which are deemed fully mature and therefore supported by all stakeholders.

Criteria for assessing the maturity of these elements should cover:

- Technical and operational feasibility within the targeted operational context, including successfully completed validation exercises .
 - Actual contribution to Performance objectives within the OPS environment identified in the geographical scope of the PCP.
- AF1 - Extended AMAN and PBN in high density TMAs
- **Mature: E-AMAN** (even if the capability of surrounding ATSU to cope with the AMAN constraints could be limited when several AMAN are cooperating with this ATSU).
 - **Needs clarification/review: PBN IR vs PCP**
 - Taking into consideration the PBN IR currently being drafted, with a different scope and a different timescale from the PCP, CANSO recommends withdrawing PBN from the PCP, or alternatively, withdrawing the PBN IR in favour of the PCP.
 - **Benefit comparison between RNAV1 & RNP1 not given. CANSO considers that it must be a local decision, based upon a local CBA**
 - Recommendation: the overall proposed solution needs to allow for each Airport to decide which mode it uses (RNAV-1 or RNP-1), so as to ensure that the overall 'positive CBA' does not occur at the expense of 'negative CBAs' for some airports.
- AF2 - Airport Integration and Throughput
- **Needs clarification/review:**
 - **Time-based Separation benefit rationale** (CANSO considers that it must be a local decision based upon a local CBA).
 - **A-CDM & DMAN scope and applicability**
 - **Geographical scope** (rationale for selected airports unclear/needs to be reviewed, e.g. for Routing and Planning & Safety Nets).
- AF3 - Flexible Airspace Management and Free Route (FRA)
- **Mature (but very challenging): Direct routing** – no specific need for new ATC tools.

- **Needs clarification/review:**
 - **Free Route** (considered **too complex for this initial step**; difficult to realise within the given **timeframe** due to the **need for new ATC tools**).
 - PCP needs to identify **which of the different concepts for DCT and FRA is being proposed**.

- AF4 - Network Collaborative Management (Flow & NOP)
 - **Needs clarification/review:**
 - **Calculated Take-off Time to Target Times for ATFCM purposes:** the proposed improvement seems promising as confirmed by the current SESAR exercise; however, this exercise also highlights a number of implementation problems that need to be investigated before proceeding to deployment.
 - **Automated Support for Traffic Complexity Assessment (interface issues)** also appears promising, but would need to be clarified (with complementary R&D work) with regard to the distribution of roles between the NM and the associated ATSU (ANSP).