



**THE FORTY-THIRD MEETING OF THE
INFORMAL PACIFIC ATC CO-ORDINATING GROUP
(IPACG/43)**

(Tokyo, Japan 27 – 28 September 2017)

Agenda Item 5: CNS Issues

PERFORMANCE BASED COMMUNICATIONS AND SURVEILLANCE IMPLEMENTATION

(Presented by IATA)

SUMMARY

This paper presents issues and concerns regarding the implementation of PBC (globally and in APAC) that require resolution prior to the agreed regional implementation, currently *no later than 29 March 2018*. A similar paper has been presented to the ICAO FIT-ASIA/6 & DGCA 54 meetings.

1. Introduction

1.1 The Asia Pacific Region has agreed to implement PBCS *not later than 29 March 2018*. This implementation was supported by APANPIRG/27 conclusions 7 through 9:

- Conclusion 7 “PBCS Operator Requirements” urges states to ensure policies procedures are established and promulgated to enable airlines to operate in airspace where PBCS has been implemented
- Conclusion 8 “State Implementation of ICAO provisions for PBCS” urges states that plan to apply separations using PBCS ensure capabilities to process the ICAO FPL indicators and have a common implementation date.
- Conclusion 9 “Asia Pacific Region PBCS Transition Strategy” endorses the regions transition strategy (which includes the target date of *not later than 29 March 2018*)

IATA and airlines are very supportive of the introduction of PBCS, where required, however, this paper raises issues and concerns with the upcoming implementation given we are now only 8 months from the target “BY” date for APAC.

1.2 Airlines are concerned that if the issues identified are not addressed prior to implementation certain operations may be penalized in circumstances that are beyond an airline’s control.

2. Discussion

CONCERNS/ISSUES WITH PBCS IMPLEMENTATION FOR CONSIDERATION:

2.1 IATA would like to raise 6 main concerns/issues as PBCS implementation nears.

1 Lack of State readiness to issue operational approval for PBCS:

This issue was raised during the regional Operational Datalink workshop on PBCS in conjunction with FITASIA/5 in May 2016. IATA remains concerned that the regulatory understanding and therefore the establishment of approval processes and procedures remains an impediment to PBCS operations and implementation. Whilst acknowledging regulators *may* be taking action only some States have promulgated AIC information and none (to our knowledge) have yet established formal approval processes for PBCS operations. It must be emphasized that States who do not actually manage airspace where PBCS is implemented must still have approval processes in place for aircraft on their registry that will operate into PBCS airspace.

2 Lack of RCP / RSP Statement of Compliance (SOC) for legacy aircraft:

Boeing and Airbus have indicated that while newer aircraft will receive a SOC for RSP/RCP in their AFMs legacy aircraft will not. Therefore B747, B757, B767 and traditional FANS-A equipped Airbus A320 / 330 / 340 will not receive an OEM SOC update to their AFM will be effected.

ICAO OPDLWG have agreed to continue exploring an alternative approach to requiring an AFM SOC. IATA is supporting this effort but a solution has yet to be identified.

3 An alternative to the requirement for commercial contracts between operators and Communication Service Providers (CSPs):

The current ICAO PBCS Manual requires operators to have oversight responsibility concerning CSP performance through commercial bilateral contract or service level agreements between operators as a condition for obtaining PBCS operational approval. CSPs (ARINC and SITA) have stated that they are not willing to guarantee performance through individual contracts as communication performance depends on various factors and stakeholders. A shared industry view is that having such contracts will not solve the issue of network performance and may unintentionally result in additional legal implications and costs.

To resolve this issue it has been proposed that States and ICAO to accept the use of a non-binding, multi-stakeholder charter in lieu of bilateral commercial contracts. The principle of the charter has been accepted by the FAA Flight Standards Division; the OPDLWG is progressing the inclusion of the charter concept into the ICAO PBCS manual.

4 Role of EMA/RMA Monitoring Agencies regarding PBCS:

ICAO PBCS concept relies on actual performance (ACP / ASP) monitoring and problem reporting both at ANSP or regional levels. To date, there has not been an agreement on EMA/RMA support for PBCS monitoring.

The recent RMSCG meeting discussed the issues around the RMAs taking on the extra responsibility for PBCS monitoring and identified a number of issues to be resolved. Agreement for all EMA/RMAs to monitor PBCS is yet to be achieved.

5 Lack of a global standardized requirement for PBCS data collection and monitoring:

Details such as data type, quantity and analysis method, have not been globally standardized and are currently expected to be varied among States.

The ICAO OPDLWG have agreed to improve ICAO guidance on data compilation and filtering. IATA HQ will support this activity, particularly as related to data collection criteria.

6 Readiness for ANSPs to process, transfer and use PBCS flight plan codes:

ICAO PBCS manual requires airspace users to file specific flight plan codes (“P codes”) to demonstrate RCP / RSP operational approval. There is some concern that all ANSPs may not be able to accept, process and transfer FPLs with the ‘P’ codes.

2.2 On a specific regional basis there are also a number of items that need to be considered for PBCS implementation:

- Revision of Regional Supplementary Procedures (Doc 7030).
- Promulgation of ANSP PBCS Operational Concept, including PBCS-based separations,
- Readiness of State Regulators to conduct PBCS safety oversight of ANSPs.
- Availability of baseline statistics on Actual Communication Performance (ACP) / Actual Surveillance Performance (ASP).

3 CONCLUSION:

3.1 The time required to ensure the above issues are addressed will influence the intended implementation date of *not later than 29th March 2018*. Additionally, experience shows that a reasonable time period is required (up to 12 months) to ensure airline fleet approvals are processed and in place.

3.2 To ensure operations are not unfairly impacted by the introduction of PBCS it is important to ensure Regional and Global readiness for this implementation.

3.3 For IPACG FIT 30 information, at FIT-ASIA 6 ICAO was requested, by IATA, to take the following actions:

- Obtain formal updates and resolution timeframes for the issues being addressed by OPDLWG
- Issue a State letter reminder and

- Conduct implementation gap analysis including the status of States regulatory readiness including EMA/RMAs, and which APAC states intend to implement PBCS in their FIRs
- Taking into account the results of the gap analysis - Re-evaluate an appropriate implementation timeline for PBCS in APAC and the need for a non-punitive policy and procedures for non-approved aircraft during the transition period.
- Co-ordinate with ICAO HQ and the NAT for possible postponement of PBCS implementation globally, if required

3.4 FIT Asia 6 decided to conduct an ICAO survey to gather information a regional basis and felt this would provide information to address most of the action items requested

3.5 FIT Asia 6 did agree to:

- ensure co-ordination with OPDLWG; ICAO HQ and the NAT region.
- hold an “extra” FIT Asia meeting in December (11th – 14th) specifically to assess the results of the PBCS survey and discuss actions to address outstanding issues to support implementation.

3. Action by the meeting

- a) note the information contained in this paper; and
- b) discuss any relevant matters as appropriate.