**FANS Interoperability Team Meeting**

**(FIT/24)**

**Hawaii, USA**

**6 to 7 March 2016**

**Agenda Item 3: Working Papers – PBCS Implementation**

**Flimsy 01 – Related to WP/11 – PBCS approval framework review**

**Presented by** **Airways New Zealand**

**1. OBJECTIVE**

1.1 This flimsy provides comments on the concerns raised in WP/11 with the objective of reaching agreement at this workshop on actions that will facilitate stakeholders successfully meeting the agreed Performance Based Communications and Surveillance (PBCS) implementation date of 29 March 2018.

**2. DISCUSSION**

2.1 The PBCS concept is not new. It has been developed over many years by many stakeholders and the requirements for implementation were published in Annexes 6, 11, and PANS-ATM with an effective date of November 2016. Both the NAT and ASIA/PAC regions recognized that an implementation date of November 2016 was not feasible and following much discussion a common implementation date of 29 March 2018 was agreed by both regions.

2.2 Guidance material is available in Doc 9869 PBCS Manual. The 2nd Edition of Doc9869 PBCS Manual has been completed and is available as an advanced unedited version prior to formal ICAO publication expected in 2017. A PBCS editing team established by the Operational Datalink Working Group (OPDLWG) of the Communications Panel (CP) continues to work on the guidance material in Doc 9869.

2.3 We recognize the concerns addressed by IATA in WP/11 however we feel that these concerns can be addressed in the current implementation timeframe if all stakeholders continue to work together. Steps have already been taken in this direction. We are advised that discussions between IATA Montreal and FAA members of the CP/OPDLWG took place last week on some of the concerns raised by IATA in WP/11 and the lead of the OPDLWG team agreed to work with IATA (who are also represented on the OPDLWG team) to improve the PBCS manual in the areas of concern going forward.

2.4 We note that the IATA members of the OPDLWG PBCS team already have an action to be completed by OPDLWG/4 in May 2018 to compile a list of specific concerns to be addressed in the PBCS Manual concerning operational approval from an aircraft operator perspective.

2.5 For the 29 March 2018 Regional Implementation we need to work with what we have in terms of the Doc 9869, but by understanding the current limitations of the guidance material we have adequate time to seek clarification and facilitate implementation on the agreed date. This work is already being progressed by the OPDLWG PBCS team and we understand from secretariat feedback that this is being given priority.

2.6 Feedback from the ICAO secretariat in Montreal on WP/11 has been received. This feedback is attached at Attachment A.

2.7 We are strongly opposed to any slippage in the agreed implementation date of 29 March 2018. We note that the concerns expressed by IATA are already being worked at the OPDLWG and we propose that as these are resolved during the next year IATA communicate the guidance arising to their members to facilitate implementation.

**3. ACTION BY THE MEETING**

3.1The meeting is invited to:

 a) Note the content of this flimsy;

 b) Agree that IATA should continue work with the OPDLWG PBCS team on IATA’s specific concerns relating to operational approval from an aircraft operator perspective; and

 c) Agree that IATA should communicate additional guidance to their members as the OPDLWG resolve their concerns to facilitate meeting the planned 29 March 2018 implementation date.

Attachment A: ICAO secretariat feedback.

Attachment A: ICAO Secretariat feedback

* The requirements for required communication performance (RCP) and associated authorization were first introduced in Annexes 6 and 11 in 2007.
* The requirements were further clarified and expanded to include performance-based communication and surveillance (PBCS) framework through the latest amendment to Annexes 6, 11 and PANS-ATM, which became applicable in November 2016.
* The minimum requirements for PBCS implementation are provided in Annexes 6, 11 and PANS-ATM, *NOT* in the PBCS manual. The manual provides guidance, which is recommended for use by States when developing their regulations, policy, procedures.
* The PBCS manual provides a sound basis for implementation of PBCS framework, which can be adapted to the needs of respective regions or States, and to the limitations of existing technologies and services.
* The issues concerning the network are one of the key aspects that was intended to be dealt with under the PBCS framework. The State regulatory authorities can use this framework as a basis for their safety oversight activities (certification, approval, continued surveillance, etc.) over provision of communication services.
* The IATA’s paper highlights the absence of such a regulatory mechanism for ensuring network performance and reinforces the needs for addressing this issue prior to implementing any new ATM operation dependent on communication and surveillance performance.
* PBCS monitoring programmes revealed the safety risks associated with ADS-C/CPDLC based separation. The expected benefits of safety oversight through air navigation services providers and aircraft operators are to identify and resolve the safety risks before and after the implementation of a new ATM operation dependent on communication and surveillance performance.
* It is recommended that discussions be focused on what can be done to meet the agreed implementation date, which was intensively discussed at multiple occasions both in the NAT and APAC regions in the past couple of years.
* The improvement of the PBCS manual is already part of the ICAO work programme tasked to the Operational Data Link Working Group of the Communications Panel (CP-OPDLWG) and will be addressed as a priority among those related PBCS.
* Any proposals by ISPACG for improvement of the PBCS manual are most welcome and will be given due consideration by the OPDLWG. The additional guidance regarding CSP may include the following
* what is actually meant by Network RTCP and also to state what’s included and what’s not
* how to measure the performance of each available technology at each boundary and also what is actually being measured.
* clarification that certification/approval/authorization should be based on the performance under the “clear sky” case where everything is working as advertised.