

## Introducing these questions and answers.....

These Event Q&A are provided as a follow up from the [Apron Service Management Webinar](#) on 23 November 2021.



### Question 1 - Applicability

**Which date must be indicated for an AMS Provider that is already providing its services? Date of entry into force of the regulation or the original date of provision of AMS at the concerned AP?**

The regulation applies as of 20 March 2022, therefore the date cannot be earlier. A transition period of 18 months has been foreseen in the Regulation to allow existing AMS providers to comply with the new provisions. EASA considers that the date in which the declaration has been submitted to the Competent Authority should be included, because the declaration confirms compliance with the requirements of the Regulation. It is hoped that for sake of safety the date of the declaration to the competent authority is very close to the date of full applicability of the AMS rules, i.e. 20 March 2022.

### Question 2 - Applicability

**In the Declaration of AMSP (GM2 ADR.OR.F.005(a)), field 4 (Starting date of the provision of apron management services : shall the AMSP backdate this if it started to provide AMS e.g. two decades ago? Or shall we just indicate the entry into force of the reg (20 MAR 2022). Just a detail and we will confirm with our competent authority anyway.**

The Regulation applies as of 20 March 2022, therefore an earlier applicability of the declaration is not possible.

### Question 3 - Roles, Tasks and Responsibilities

**Shall Apron Services be included in the safety programmes established by aerodrome operator" - for example the Runway Safety Team?**

Local Runway Safety Team, Apron Safety Committee are two examples of committees in which the Apron Management Services (AMS) provider could participate.

#### **Question 4 - Roles, Tasks and Responsibilities**

**Is it correct to assume that AMS provider (which can be the entity mentioned in ADR.OR.F.005 b) need not be the same entity as the organisation responsible for the provision of AMS (ADR.OR.F.005 a) entity?**

Question is not clear, however ADR.OR.F.005 refers to the content of the declaration of the AMS provider.

#### **Question 5 - Roles, Tasks and Responsibilities**

**On slide 21 was stated "different" regarding part OR.F/OPS. But if for example a ground-handler provides marshalling services the main responsibility rests with the ADR-Operator, or not?**

There was an error in the slide. The Management System requirements apply equally to AMS providers, aerodrome operators and air traffic services providers if they are providing apron management service. However, because the requirements are similar to the existing management system requirements for aerodrome operators and air traffic services providers, it is expected that aerodrome operators and air traffic services providers need to include apron management into their existing management system. Marshalling service alone is not an apron management service but one of its functions. The responsibility is on the aerodrome operator however it can be delegated to other organisations, for example a ground handling service provider.

#### **Question 6 – Roles, Tasks and Responsibilities**

**Under what part will be AMS providers considered, that are 100 % owned by an aerodrome operator? Will they be included in the aerodrome certification and structure or do they have to follow subpart F?**

Subparts ADR.OR.D and ADR.OR.F are almost identical. In the case where AMS is provided by the aerodrome operator, it is expected that the aerodrome operator has to comply with Subpart ADR.OR.D and only implement any additional requirements from Subpart ADR.OR.F.

#### **Question 7 - Roles, Tasks and Responsibilities**

**A follow up question on my last question for clarification. Just to be precise, if the organisation doing refuelling is a contracted organisation, it does not fall under the AMS regulation. ADR.OPS.D.060 is requesting refuelling procedures. Which organisation is responsible for this procedure?**

Regulation (EU) 2020/1234 addresses not only apron management service but also apron safety. Refueling procedures are falling under apron safety.

#### **Question 8 - Roles, Tasks and Responsibilities**

**If the aerodrome operator is the AMS provider, will they need a declaration also?**

No, they must provide the information in the terms of the certificate.

#### **Question 9 - Roles, Tasks and Responsibilities**

**Is it possible to explicit the difference between declaration for AMS and point ADR.OR.B.025 (a) (3) applicable to aerodrome operator?**

The declaration in point (a)(3) of ADR.OR.B.025 is part of the certification process of the aerodrome and is not related with the declaration of the AMS provider. It refers to the compliance with points (a)(1);(i);(ii);(iii) of this article.

#### **Question 10 - Roles, Tasks and Responsibilities**

**What shall be done by the Aerodrome operator, if now the AMS is providing ATS at our aerodrome?**

The question is not very clear, however if air traffic services are providing AMS as well then it has to be recorded in the formal arrangement between the aerodrome operator and the air traffic services provider.

### **Question 11 - Roles, Tasks and Responsibilities**

#### **When ATS gives guidance in the Apron needs a declaration as AMS?**

No, a declaration is not required for air traffic services

### **Question 12 - Roles, Tasks and Responsibilities**

**Will the obligation for a formal arrangement between the AMS provider and the ANSP also be included in the 'ANS' Regulation (EU) 2017/373? The obligation to have a formal arrangement suggests to be bi-lateral, and thus to be an obligation for both parties.**

Please refer to ATS.OR.110 in Regulation (EU) 2017/373 and AMC3 ATS.OR.110.

### **Question 13 - Roles, Tasks and Responsibilities**

**What would the consequences of defining apron boundaries for the CS evaluation be?**

There is no effect on the CS evaluation. The definition of apron boundaries is mainly for operational reasons and in many cases do not coincide with the strict definition of apron.

### **Question 14 - Roles, Tasks and Responsibilities**

**ADR.OPS.D.005 Apron boundaries.**

**Q. Consequences of defining apron boundaries for the CS evaluation.**

**ADR.OPS.D.010 Coordination of aircraft entry to/exit from the apron, referred to the designated handover points.**

**Q. Consequences of defining those handover points for the apron vehicle movement without ATC authorization.**

**ADR.OPS.D.085 Training and proficiency check programme of personnel providing taxi instructions to aircraft through radiotelephony.**

**Q.1 What is the aerodrome operator responsibility related to this requirement?**

**Q.2 Should the aerodrome operator keep the documents that support the ATS provider accomplishment of the requirement?**

**Q.3 In case there were a AMS provider established, should it be enough with a copy of the declaration/notice indicated in ADR.OR.F.005 Declaration of the organisation responsible for the provision of AMS?**

**If an aerodrome operator, with no AMS provider or with no dedicated unit to provide apron management services at an apron either, identifies, when evaluating the activities included in the ADR.OPS.D.001 new requirement, that it has allocated responsibilities to other organisations, Q. should that be considered as an establishment of Apron Management Services? Q. Is there the need, for an aerodrome operator with a AMS provider, to check and assure that it meets any of the requirements included in the new subpart F?**

**If an aerodrome operator, with no AMS provider declared and with a “NO” in the “provision of apron management services (yes/no)” term of the certificate, ensures the fulfillment of all subpart D requirements,**

**Q. should that be considered as a modification of the terms of its certificate?**

**Q. Should the item “provision of apron management services (yes/no)” turn into a “YES”?”**

The definition of the apron boundaries does not have an impact on the CS. Normally the boundaries of the apron boundaries are well defined however at some aerodromes there might be cases where the boundaries are different from the limits of the apron in order to facilitate the handover points and smooth transition from the apron management to ai traffic services.

In any case, when the regulation applies (20 March 2022), established AMS providers need to submit a declaration to the Competent Authority of the aerodrome in accordance with ADR.OR.F.005

An organization, in order to be considered as AMS provider needs to provide at least the services described in points (a)(1) and (a)(2) of ADR.OPS.D.001.

The responsibility to ensure that the AMS provider meets the requirements of ADR.OR.F is on the Competent Authority.

In the terms of the certificate the relevant field for the provision for apron management service is reserved for the aerodrome operator only.

### **Question 15 - Roles, Tasks and Responsibilities**

**At an aerodrome where part of the AMS activities are carried out by ground handling companies, shall these companies be considered AMS individually? The aerodrome operator and ANSP would still carry out some AMS activities as per ADR.OR.F.005.**

The minimum requirements for an organization to be considered as AMS provider are points (a)(1) and (a)(2) in ADR.OPS.D.001.

### **Question 16 - Roles, Tasks and Responsibilities**

**Regarding requirement D.010, what would be the consequences of defining those handover points for the apron vehicle movement without ATC authorization?**

The question is not clear. Driving on the manoeuvring area and the aprons is regulated in accordance with ADR.OPS.D.027.

### **Question 17 - Roles, Tasks and Responsibilities**

**In the presentation it says that ADR.OR.F only applies to organisations providing guidance to a/c. In the ops part nevertheless, EASA is requesting procedures outside that scope (e.g. refuelling procedures). Who exactly is responsible for establishing such a (refuelling) procedure and showing compliance to it?**

The regulation does not addresses only apron management service but apron safety as well. The responsibilities of the aerodrome operator on apron safety rules are included in Subparts B and D of ADR.OPS.

### **Question 18 - Roles, Tasks and Responsibilities**

**All requirements of ADR.OPS.D are only applicable to aerodrome operators and not to AMS. How does this relate to ADR.OR.F.001(a)?**

The aerodrome operator is responsible for apron management operations in accordance with the Essential Requirements of Regulation (EU) 2020/1234, therefore ADR.OPS.D is addressed to the aerodrome operator. The way the service should be provided is not only in accordance with point (a) in ADR.OR.F.001 but considering also points (b) to (e).

### **Question 19 - Roles, Tasks and Responsibilities**

**Is it possible that if only specific tasks of the AMS are provided by third parties (i.e. marshalling), the procedures for contracted activities are being used (instead of a separate declaration)?**

The provision of marshalling alone does not qualify for apron management service. Marshalling may be delegated to third parties and needs to be included in the aerodrome manual. A declaration is not required in this case.

### **Question 20 - Roles, Tasks and Responsibilities**

**"How do you deal with a situation where you have many different stakeholders performing ""apron management services"" which are not the aerodrome operator or the ANSP, e.g.**

**Company A providing Taxi instructions on Aprons**

**Company B providing Follow Me**

**Company C providing Marshalling**

**Company D providing Follow Me on Cargo Aprons only.**

**Who needs to be part of a declaration? Do they all need to comply with OR.F?"**

An organization, in order to be considered as AMS provider needs to provide at least the services described in points (a)(1) and (a)(2) of ADR.OPS.D.001. The provision of marshalling alone is not considered apron management service, however the other three cases may be considered provided that point (a)(2) of ADR.OPS.D.001 applies as well.

### **Question 21 - Roles, Tasks and Responsibilities**

**Is it possible that if only specific tasks of the AMS are provided by third parties (i.e. marshalling), the procedures for contracted activities according to ADR.OR.D.010 are being used (instead of a separate declaration)? Meaning the responsibility remaining with the aerodrome provider. Or is it not possible to use contracted activities for AMS?**

The provision of marshalling alone does not qualify for apron management service. Marshalling may be delegated to third parties and needs to be included in the aerodrome manual. A declaration is not required in this case.

### **Question 22 - Roles, Tasks and Responsibilities**

**Is a ground handling organisation providing marshalling services (ADR.OPS.D.035) at an aerodrome considered as an AMS-provider with the need for a declaration in line with OR.F? Or is this considered as a contracted activity in line with ADR.OR.D.010?**

The provision of marshalling alone does not qualify for apron management service. Marshalling may be delegated to third parties and needs to be included in the aerodrome manual. A declaration is not required in this case.

### **Question 23 - Roles, Tasks and Responsibilities**

**The notification is applying to certified ATC or ADR operators others than the aerodrome operator of that particular aerodrome, but it is not necessary to be notified when the aerodrome operator is itself providing the AMS.**

The question is not clear.

### **Question 24 - Roles, Tasks and Responsibilities**

**Generally, the provision of the activities listed within ADR.OPS.D.001 will be allocated (or provided) to several parties. But we can only consider that we have an AMS provider (under Subpart F) when ADR.OPS.D.001 a)(1) or a)(2) are provided. Right?**

Yes, the assumption is correct. The minimum requirements are the ones described in points (a)(1) and (a)(2) in ADR.OPS.D.001.

### **Question 25 - Roles, Tasks and Responsibilities**

**Does all this mean that AMS can be defined as communicating taxiing, start up, push back clearances/information and not marshalling or allocating parking stands?**

The minimum requirements for an organization to be considered as AMS provider are the ones described in points (a)(1) and (a)(2) of ADR.OPS.D.001. All the other services are complementary.

### **Question 26 - Roles, Tasks and Responsibilities**

**"Why section 14 of the aerodrome manual does not include procedures implemented on the apron in order to:**

- (1) regulate movement with the objective of preventing collisions between aircraft, and between aircraft and obstacles;**
- (2) regulate entry of aircraft into, and coordinate exit of aircraft from the apron with the aerodrome control tower;**
- (3) ensure safe and expeditious movement of vehicles?These procedures are required by ADR.OPS.D.001"**

The proposed content of the aerodrome manual in AMC3 ADR.OR.E.005 does not limit the inclusion of further procedures related to the provision of apron management service.

### **Question 27 - Roles, Tasks and Responsibilities**

**ADR.OR.F.001 requires the AMS to provide apron management services i.a.w. ADR.OPS.D. However, OPS.D does not apply to AMS (not being an aerodrome operator). This is confusing.**

The AMS provider is providing the service in accordance with the procedures included in the aerodrome manual. The responsibility for the establishment of these procedures is on the aerodrome operator.

### **Question 28 - Roles, Tasks and Responsibilities**

**What type of services at an airport you rate as "AMS" ???**

The minimum services for an organization to be considered as AMS provider are those described in points (a)(1) and (a)(2) of ADR.OPS.D.001.

### **Question 29 - Roles, Tasks and Responsibilities**

**Q.1 - Is it in the remit of the aerodrome operator to designate/authorize an AMS provider ?**

**Q.2 - Regarding the Management of aircraft movements on the apron or Aircraft stand allocation, to what extent the aerodrome has to apply measures provided by AMC/GM such as :**

- (a) issuing verbal instructions on a predetermined air-ground communication facility; or**
  - (b) using a 'FOLLOW ME' vehicle; or**
  - (c) appropriate marshalling hand signals; or**
- (AMC1 ADR.OPS.D.015(a) and AMC1 ADR.OPS.D.025(a)(3))**

**Because such activities may not be in the remit of the aerodrome operator."**

The role of the aerodrome operator is to designate/decide on the AMS provider. In regard to the second question the aerodrome operator needs to establish and ensure the implementation of procedures.

### **Question 30 – Training Programme**

**If the apron management is provided by ATSP, then is the training programme subject to 340/2015 or 2020/1234?**

The training programme of the personnel providing taxiing instructions to aircraft at the apron is subject to Regulation 2020/1234. The programme has a similar structure with the training of air traffic controllers. It is expected that in this case the training will cover only the subjects which are not common.

### **Question 31 - Training Programme**

**What about new hired / future certified ramp tower controllers post Declaration? It is required to provide evidence of completion of initial and unit training at the Declaration stage but nothing is mentioned in the management of subsequent Changes. Will the AMSP need to provide to its competent authority the certificates of each newly certified ramp tower controller? Or does the ANSP just need to keep these certificates available in its archives IAW the reg?**

Evidences need to be provided before the provider commences the provision of AMS. The regulation does not specify what evidences are required, therefore it has to be agreed with the competent authority.

### **Question 32 – Training Programme**

**Should aerodrome operator training program (ADR.OPS.D.80) consider the 12 months referred in Reg2020/1234 or the 24 months referred in Reg 2020/2148 for recurrent training.**

Training should be conducted at intervals in accordance with ADR.OR.D.017, while proficiency checks should be conducted in accordance with ADR.OPS.D.080.

### **Question 33 – Training Programme**

**D.085 - is the trg subject to CA approval (vide: 340 reqs for ATCO programmes)?**

No, the training programme is not subject to Competent Authority approval, but the AMS provider declares that it complies with the requirements in Part-ADR.OR and Part-ADR.OPS.

### **Question 34 – Training Programme**

**"Q.1 Concerning the training required by ADR.OPS.D.085, will existing AMSP training be sufficient when Regulation (EU) 2020/1234 comes into force or will initial training (as defined in AMC1 ADR.OPS.D.085(a)(2)(i) ) be required for all agents already trained?**

**Q.2 Concerning the language proficiency required by ADR.OPS.D.085, will existing AMSP training and assessment be sufficient when Regulation (EU) 2020/1234 comes into force or will it be necessary to obtain a certificate before 20/03/2022 for all AMSP agents?"**

Regarding the first question, the existing training programme should be compared against the content of the AMC to identify any gaps. Then, a training on the missing elements, if any, is required.

For the second question, if the personnel has completed the required language proficiency training and have demonstrated the required level, then a certificate should be issued.

The regulation had a transition period of 18 months in order to allow organisations to prepare themselves by the applicability date.

### **Question 35 – Parking and Pushback**

**Are you implying that self-parking with the use of STOP LINE markings on ground is not allowed?**

Points (a) and (b) in ADR.OPS.D.035 require the monitoring of the designated area for aircraft parking during parking manoeuvre to ensure that safety distances are maintained and guidance is provided. The acceptable methods are described in AMC1 ADR.OPS.D.035(b).

### **Question 36 – Parking and Pushback**

**What about the tug-drivers eg pushback-procedures (single-man or two persons), if they will communicate via flight crew or ANSP or AMS? The GM/AMCs does not include this comprehensively**

The question is not clear.

### **Question 37 – Parking and Pushback**

**Direct contact between tow tug / push-back might happen if the aircraft is towed from the apron to the maintenance area on another apron in our case**

Question is not clear.

### **Question 38 - Refueling**

**"Under (b)(2) is written „the prohibition to start ground power units during refuelling“.**

**Does this only restrict starting an external GPU or does it also restrict plugging in the plug or switching the GPU to 400 Hz frequency?"**

This restricts the switching on of an external GPU to avoid possible ignitions.

### **Question 39 - Refueling**

**Does this GPU regulation also effect "Lithium-ion powered GPUs"?**

The use of electric GPUs is new and has not been taken into consideration when drafting the regulation. Further assessment will be conducted by EASA.

### **Question 40 - Refueling**

**Refueling and many other issues covered by OPS.D are normally provided by Ground handling service Providers. However OPS.D covers safety procedures which the Aerodrome Operator must implement in his procedures and these will apply to all who provide a service related to, or on the apron.**

EASA would like to confirm that many of the services in ADR.OPS.D can be provided by other organisations, however the responsibility to develop and ensure the implementation of the procedures is the responsibility of the aerodrome operator.

### **Question 41 - Refueling**

**If the organisation doing refueling is a contracted organisation, it does not fall under the AMS regulation. ADR.OPS.D.060 is requesting refueling procedures. Which organisation is responsible for this procedure?**

The aerodrome operator is responsible to establish generic safety procedures during aircraft refueling. Organisations refueling aircraft may have additional procedures in place which are not subject to this regulation. They will be handled under RMT.0728 'Provision of groundhandling services'

### **Question 42 - Marshalling**

**IATA AHM is describing topics for e.g. aircraft marshalling. are these requirements relevant for approval of airport?**

The topic of aircraft marshalling is covered by Regulation (EU) 923/2012 'Standardized European Rules of the Air (SERA)'

### **Question 43 – Follow Me**

**Is the 'FOLLOW ME' service mandatory?**

No, marshalling service is one of the possible means to provide instructions to aircraft, but not the only one. Refer to AMC1 ADR.OPS.D.015(a).

#### **Question 44 – ATC Services**

**The new regulation puts total responsibility for AMS on Aerodrome Operator. But in countries where Aerodrome Operator has no control of aircraft movement at all (even on the Apron) how can the Aerodrome operator can be responsible for the tasks done by ANSP?**

The apron has never been part of the provision of air traffic services. However, this does not prevent the ANSP to provide regulation of aircraft movement at the apron, in agreement with the aerodrome operator.

#### **Question 45 – ATC Services**

**Can or Must the Aerodrome operator check that AMS and Air Traffic service that they comply with the regulation as Aerodrome operator is the final responsible of the implementation of these regulation?**

The aerodrome operator is responsible to set-up the procedures for the provision of apron management services at the aerodrome. The responsibility to ensure the compliance is on the Competent Authority where the AMS provider has submitted the declaration. In any case there are formal arrangement between the aerodrome operator and the AMS provider and a certain obligation for the AMS provider to participate in the safety programmes of the aerodrome operator and in the occurrence reporting system.

#### **Question 46 – Remote Towers**

**"EASA issued Guidance Material on Remote Aerodrome Air Traffic Services (ED Decision 2019/004/R), which allow ATS unit to provide AMS services remotely. EPAS 2021-2025 defines new rulemaking task RMT.0624, which aims at developing and expanding of soft law on remote aerodrome ATS provision. There is no mention of remote AMS in the description of this task, there is no other dedicated task in this regard in EASA EPAS.**

**Will the remote tower concept be implemented to provide AMS services by aerodrome operator?"**

The issue has not been foreseen, however if there is a need, EASA will explore this option.

#### **Question 47 - Manuals**

**Q.1 What is the most suitable way/procedure to summarize the current contents of the ADR-Manual (as ADR Operator) and requirements as per (EU) 2020/1234 on Apron Management Services (Providers Operation-Manual)?? I would say the best solution is an a "common part" in both manual with identical content!??**

The question is not very clear.