European Union Aviation Safety Agency

Comment-Response Document (CRD) 2023-02

RELATED NPA: 2023-02 — RELATED OPINION: NO 06/2024 — RMT.0668

TRAINING THE NEXT GENERATION OF ATCOS

10.10.2024

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1. Summary of the outcome of the consultation

During the consultation of the draft regulatory material EASA received 610 comments from 34 affected and interested parties, including industry, national competent authorities (NCAs), social partners and international organisations. Comments have also shown synergy and a coordinated approach between the service providers and their national competent authorities. In addition, 30 comments were placed on the quality of the proposal, which are not included in the CRD (they are assessed for internal quality assurance purposes). The graph below illustrates the distribution of comments amongst the various types of stakeholders.
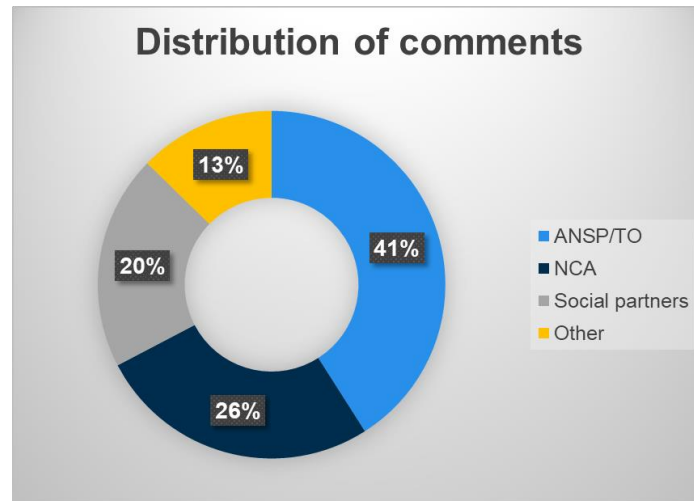
The main areas commented were the regulatory means selected, the equivalence and/or scalability of the adapted competency models, the suitability of the instructor and assessor competency frameworks, and the implementation timeframe. Apart from these concerns, the concept of inter-rater reliability, the shortening of the period applicable for counting the minimum number of hours to maintain competence, and the acceptance of third-country licences received more attention from stakeholders.

In the context of the public consultation, 297 comments have been accepted or partially accepted, while 115 comments have not been accepted, as illustrated in the graph below. All 610 comments have been individually responded to in this CRD, while Section 2.4 of the Explanatory Note to Opinion No 06/2024 highlights the comments that were repetitive or for which the solutions required further explanation.
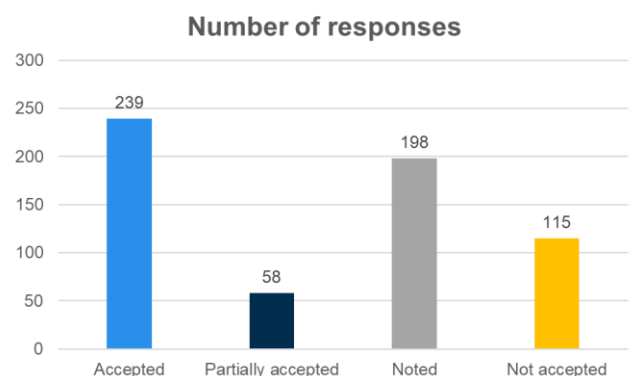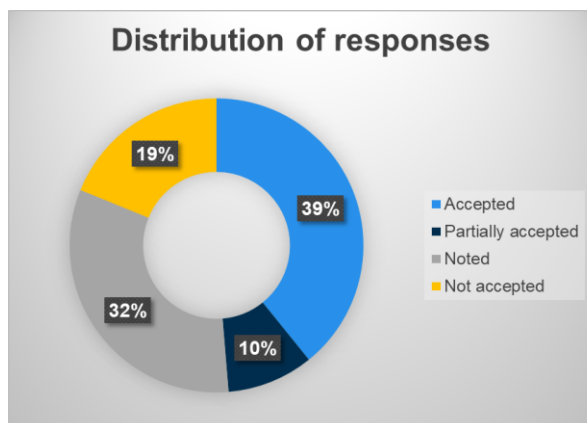
2.   Individual comments and responses

In responding to comments, EASA states its position as follows:

(a)   **Accepted** — EASA agrees with the comment and any proposed change is incorporated into the text.

(b)   **Partially accepted** — EASA either partially agrees with the comment or agrees with it but the proposed change is partially incorporated into the text.

(c)   **Noted** — EASA acknowledges the comment, but no change to the text is considered necessary.

(d)   **Not accepted** — EASA does not agree with the comment or proposed change.

(General Comments)	-

comment	*36*	comment by: *GdF*

About the CRT:

Select background color - does not do so. Instead, the font or size of the text is changed.
Toggle Spellcheck - only evokes an error message. Either not installed in PHP or URL rejected.

Using Chrome.

response	Noted

comment	*94*	comment by: *ENAIRE*

As a general remark, after the removal of the word "immediately" in several locations, all "an" should be changed to "a". We have detected it in: ATCO.B.025 a) 3), ATCO.C.010 b) 2), ATCO.C.045 d) 1), ATCO.C.065 a) y b) y c).

response	Accepted

comment	*95*	comment by: *ENAIRE*

We suggest that a definition or a GM about "*current operation practices*" is added to the document.

response	Accepted See the new GM1 ATCO.C.040(d).

comment	*96*	comment by: *ENAIRE*

An agency of the European Union

	We suggest that a definition or a GM regarding "*normal operational duties*" is added to the document. It may also clarify what "in any circumstances unless an abnormal situation occurs" means.
response	Partially accepted
	The term 'normal' is deleted to avoid interpretation problems.

comment	*97*	comment by: *ENAIRE*
	Although some examples of "*performance criteria*" may be found in Document 9868, we would like you to consider the addition of a GM that would specify better examples or the minimum data that it should require.	
response	Noted	
	Performance criteria are the observable behaviours, conditions and competency standards associated with the competencies that are defined in an adapted competency model. For rating training (initial training), the minimum competencies are defined in ATCO.D.035, the minimum observable behaviours and competency standard are described in AMC 1 ATCO D.035 (c); (e), and the minimum conditions for the various ratings are described in AMC 2-6 to ATCO.D.035 (c);(e). For unit training, these performance criteria will be specific to the local environment and based on the operational, technical, organisational and regulatory requirements.	

comment	*183*	comment by: *IFATCA*
	Attachment #1	
	IFATCA welcomes the initative of this NPA. Find attached the IFATCA Training Manual as a general indication.	
response	Noted	

comment	*193*	comment by: *CroControl*
	Proposal to check whole document and make consistent wording when to use applicant, candidate, student, trainee and individual.	
response	Accepted	

comment	*201*	comment by: *Estonian Transport Administration*
	There where no indications, requirements or topics on unmanned traffic to any kind of ATCO training. We are in an opinion that as it already has impacted conventional air traffic principles a lot, ATCO's should be trained and prepared for from that angle as well, at least basic knowledge and skills.	
response	Partially accepted	

The Basic training subjects on Aircraft and Professional Environment contain objectives related to RPAS. This will be further considered in a future update of the training objectives related to UAS and RPAS.

comment	219	comment by: *CANSO*

New expressions

The AMC contains new expressions, such as "training hours" and "working hours," which are neither applied nor explained in the relevant regulations. The AMC also indicates that the duration of a unit endorsement course can only be counted in hours.
Can you clarify these new expressions?

We also believe that a clear definition of "safety analysis" should be added to the regulation.

response	Partially accepted

There is no need for further definitions as the expressions in question are deleted from the text.

Providing a safety analysis in well-defined cases is a long-standing requirement and its content shall be tailored to the actual needs. No definition or list of binding elements is considered necessary.

comment	226	comment by: *CANSO*

Concerns about the Transition Period for Implementing Changes in the NPA
CANSO Members are concerned regarding the feasibility of the proposed 15-month transition period for implementing the changes outlined in the NPA, considering the associated costs and operational adjustments required.

Key Points:

- Timeframe Challenges: Depending on the size and maturity of the organization, adapting to the proposed changes, particularly the CBTA approach, may require **several years** rather than the proposed 15 months.
- Workforce Considerations: Some ANSPs are currently facing a significant number of retirements and are in the process of recruiting a large number of ATCOs. Additionally, challenges arise from the ongoing renovation of ATCOs' tools and the modernization of ATCO systems. This places additional strain on available training resources.

The differences that ANSPs would need to implement to achieve the EU-wide comparability of students require adaptation of their documentation, negotiation of approvals by the local work council, and finally familiarisation/refreshing of all instructors and assessors as well as OJTIs with the new structures. This will be time-

consuming. A well planned schedule and timely available AMC/GM would be essential.

Proposal for Extension: Considering these factors, it is requested to to extend the transition period (e.g. 5 years). This would allow ANSPs to effectively manage the necessary adjustments and ensure a smooth and successful implementation of the new requirements.

response	Accepted

comment	*255*	comment by: *EUROCONTROL*

The NPA is sound and addresses in depth the amendment needed in the current regulation to bring it in line with ICAO SARPS.
The NPA is fit for purpose, the fact that different authors were involved in drafting the document is a strength but also leads to some inconsistencies that are commented below.
Agree with all proposed changes unless otherwise indicated in the following comments

response	Noted

comment	*308*	comment by: *EUROCONTROL*

Agree with all proposed changes unless otherwise indicated in the following comments

response	Noted

comment	*315*	comment by: *Europe Air Sports*

Europe Air Sports (EAS), the organisation representing sports and recreational aviation in Europe, thanks EASA for the possibility to place comments on this NPA.

While EAS and its members' main regulatory focus areas have to do with flight crew licencing and flight operations rules, and much of our flying takes place in uncontrolled airspace, it must be noted that **EAS members interact with ATCO personnel during a significant number of our flights**.

Therefore it is **imperative that the ATCO training gives good competence to ATCOs to handle interaction with VFR traffic and with various aircraft categories**, in addition to the controlling of large commercial aircraft. We will expand on this in our detail comments.

Overall, EAS regards the NPA a good document. EAS supports the objectives of the NPA and the introduction of competency based training and assessment (CBTA).

response	Noted

comment | *319* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

General comment 1

DGAC FR thanks EASA for the work carried out under subtask 4 of RMT.0668.

DGAC FR notes that contrary to what has been announced on several occasions by the Agency, EASA is starting to implement CBTA provisions for ATCOs independently of other areas (i.e. Aircrew...).

DGAC FR reckons that the most efficient way to introduce the latest ICAO Annex 1 amendment and associated ICAO documents on the competency-based training and assessment (CBTA) concept for the appropriate licences and ratings and to avoid significant discrepancies within CBTA European regulations is for all EASA sections involved (i.e. FCL teams, ATCO team etc..) to coordinate closely all together internally.

During the February 2023 MAB, it was indicated that "On ATCO licencing, Competency-based Training and Assessment (CBTA) was highlighted as an area where close alignment with the other domains is necessary and EASA informed that a transversal Agency task is coordinating the approach in all domains." DGAC FR would like to know if this transversal task has already been put in place and how the coordination works.

CBTA elements proposed by RMT.0668 will be a useful contribution to EASA forthcoming regulatory activities concerning the implementation of CBTA for pilots under RMT.0194 (subtask2) and RMT.0599 (substak 2), as well as the ongoing RMT.0230 (e-VTOL pilot licenses and remote pilots).

Finally, it should also be pointed out that the respective timetables of RMT.0668 for ATCOs and RMT 0.194 (subtask 2), RMT.0599 (subtask 2) and RMT.0230 for pilots should be brought into line accordingly.

General comment 2

According to both EPAS 2022-2026 edition and to EPAS 2023-25 edition, objectives of subtask 4 were to ensure the availability of a more harmonised **initial training qualification** output in order to handle complex and dense traffic situations, to enhance the qualification requirements for instructors and assessors by setting the required performance standards using the principles of competency-based training and assessment (CBTA).

It is also repeatedly explained and in detail in the introduction (see about this NPA (page 7) and in the summary (page 9)) that the NPA concerns the harmonization of the **initial training** in accordance with objectives of subtask 4, whereas in the body of the text, the NPA also deals with unit training. All aspects of controller training (initial training (IT), unit training (UT) and maintenance of competence (MC)) incorporate CBTA concepts into the NPA. This contradicts the stated objective, as it does not restrict the scope to initial training.

French ANSPs will not be in capacity to put that into place in the current period. Their training teams are facing other safety, cost savings and ecological issues that implies all their human resources. French ANSPs will not be able to get all their unit and continuous training plans fully CBTA-compliant in the next five years, they first need to get the modernisation of their ATM systems fulfilled (security), train and qualify an increasing amont of ATCO (huge wave of retirement to overcome) and focus on continuous descent and ecological issues. This work needs to be done after modernization to avoid having to do it twice.

Therefore, DGAC FR would suggest that CBTA proposal be reviewed with an aim to be restricted to initial training only or with a 5-years transition period if unit training is still included.

General comment 3

Introduction of <u>CBTA in European ATCO licencing scheme</u> will constitute a change in training for training organizations and competent authorities.

At European level, introducing CBTA innovative training concept with little experience at international level, should lead to a cautious approach. EASA must demonstrate that introducing CBTA CBTA in <u>European ATCO licencing scheme</u> will not degrade aviation safety.

Therefore, safety studies assessing the risks prior <u>the implementation of CBTA in ATCO training are needed</u>.

General comment 4

Under Article 67 of the Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018, there is an obligation to recognize licences and certificates issued by other EU member States in accordance with Commission Regulation (EU) 2015/340 of 20 February 2015.

Accordingly, it is very important that any evolution in training and licencing be harmonized to support the ability of EU States to recognize licences, with confidence there is a harmonized understanding and application of all regulatory requirements related to issuing licences. It is also important that any future proposals in regard to experience requirements are based on commonly agreed data and that all EU States and licencing authorities have clear provisions for their responsibilities for the approval and oversight of approved training organizations (ATO) that use CBTA programmes.

Therefore, feedback and data gathering are required to support oversight to ensure harmonized application and to support also further evolution of CBTA and support any discussions on changes to experience requirements. Periodic reports including data on CBTA implementation should - as a minimum – be submitted to the Commission and the Agency by Member States.

<u>General comment 5</u>

Particular attention must be paid to the training of Authority inspectors, who will be responsible for approving ATCO training programs in the new CBTA format. Requirements for competent authorities in Annex II (Part ATCO.AR) must be developed. Particularly standards for CBTA oversight activities as well as qualification criteria for the involved inspectors from competent authorities will need to be developed. These additional provisions will address the specificities of approval and oversight processes with regard to CBTA.

General comment 6

As mentioned in the summary (2.1.5 ICAO and the CBTA page 13), ICAO has established a Personnel Training and Licensing Panel with the task of introducing the CBTA as a route to licensing for all licensed aviation personnel, including ATCOs. Work is still in progress. A first set of CBTA-related amendments to Annex 1 and the

PANS-TRG should be presented to be adopted in November 2023 by PTLP. These amendments are planned for an applicability date of November 2024.

CBTA-related amendments to <u>Commission Regulation (EU) 2015/340</u> must be aligned with ICAO CBTA-related amendments to Annex 1 - Personnel Licencing and the Procedures for Air Navigation Services - Training (PANS-TRG; Doc 9868).

response	Partially accepted

#1

EASA actively participates in the ICAO work in this domain and has members and advisors from all disciplines concerned that participate in the ICAO Personnel Training and Licencing Panel that is driving the Annex 1 CBTA amendments. Furthermore, close coordination among the various domains being subject to the Annex 1 CBTA proposals is carried out. Advancing the introduction of the CBTA methodology via the update of the regulatory framework applicable to ATCO training is the chosen means to ensure further harmonisation, especially in the rating training.

The transversal RMT will take into account these achievements and potentially enrich the ATCO domain with further alignments with regard, for example, to the requirements applicable to training organisations or to the national competent authorities.

#2

The suggestion for a longer transitional period is supported by the Agency.

#3

Noted. One of the reasons for choosing CBTA (besides the ICAO Annex 1 future amendments) is that it is already closely aligned with current practices for determining proficiency/competence. Nonetheless, a cautious approach is noted and GM will be provided for ITO/ATSPs to manage the transition from the current practice to CBTA while ensuring the same levels of safety. This has previously been achieved safely in other domains e.g. transitioning from conventional pilot recurrent training to evidence-based training (EBT).

#4

The Workshop organised by EASA and Eurocontrol under the theme *Training for Success – Leading the way with CBTA* that took place in Luxembourg on 20-21 November 2023 concluded, among others, that the ATM training community agreed on the benefits of voluntary collaborative data-sharing and analysis to be brought forward via the D4S initiative. This initiative will be further discussed and prepared with stakeholders during the transitional period of the new amendment with the aim of launching the coordinated data gathering when the amended Regulation becomes applicable.
There are no current proposals to amend the experience requirements.

#5

Further requirements regarding the NCA staff will be developed in the framework of the transversal RMT and will be applicable in a cross-domain manner.

#6

EASA actively participates in the ICAO Personnel Training and Licencing Panel that is driving the Annex 1 CBTA amendments. The proposed amendments to the European ATC Licence are currently aligned with the anticipated Annex 1 proposal. However, according to our information, the ICAO deliverables are delayed and will still be subject to various considerations.

comment	394	comment by: *Naviair*

As a general remark, Naviair supports the comments made by CANSO to this NPA. Our comments will therefor reflect the CANSO position.

Furthermore Naviair have two general remarks:

1. We foresee that the changes proposed would create a futher administrative burden on our organisation related to the ekstra trainings ressources required (e.g. for observable behaviours and the reduction from 12 to 6 months periode for minimum compentency) all requiring to add further training ressources by the organisation and thereby futher increase the cost of training ATCO's.

2. The deadline for implementing the changes proposed by this NPA is unrealistic short given the current contrains that most ANSPs in the EU have and the shortage of ATCO at the current time.

response	

Noted

No direct link is seen between the applicable period for minimum competency and the training resources.

comment	395	comment by: *Naviair*

New expressions

The AMC contains new expressions, such as "training hours" and "working hours," whichare neither applied nor explained in the relevant regulations. The AMC also indicates that the duration of a unit endorsement course can only be counted in hours.
Can you clarify these new expressions?

We also believe that a clear definition of "safety analysis" should be added to the regulation.

response	

Partially accepted

There is no need for further definitions as the expressions in question are deleted from the text.
Providing a safety analysis in well-defined cases is a long standing requirement and its content shall be tailored to the actual needs. No definition or list of binding elements is considered necessary.

comment	396	comment by: *Naviair*

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Workforce Considerations: Some ANSPs are currently facing a significant number of retirements and are in the process of recruiting a large number of ATCOs. Additionally,
challenges arise from the ongoing renovation of ATCOs' tools and the modernizat ion ofATCO systems. This places additional strain on available training resources.

The differences that ANSPs would need to implement to achieve the EU-wide comparability of students require adaptation of their documentation, negotiation of approvals by the local work council, and finally familiarisation/refreshing of all instruct ors and assessors as well as OJTIs with the new structures. This will be time-consuming. Awell planned schedule and timely available AMC/GM would be essential.

Proposal for Extension: Considering these factors, it is requested to extend the transition period (e.g. 5 years). This would allow ANSPs to effectively manage the necessary adjust ments and ensure as mooth and successful implementation of the new requirements.

response	Accepted

comment	*443*	comment by: *Civil Aviation Authority the Netherlands*

The Netherlands civil aviation authorities have no comments on this NPA.

response	Noted

comment	*446*	comment by: *DSNA chief of ATCO training program*

DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on

continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response | Accepted

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comment | *447*   comment by: *DSNA chief of ATCO training program*

DsnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response | Partially accepted

The adapted competency models for unit training shall be developed by the training organisations locally.
Regarding AMC2 ATCO.D.090, the training for instructors is reviewed and new AMC are proposed.

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comment | *479*   comment by: *FOCA Switzerland*

The Federal Office of Civil Aviation (FOCA) in Switzerland thanks the EASA for giving the opportunity to comment on this NPA 2023-02 concerning the Competency-based training and assessment (CBTA).

While supporting the CBTA principle and a harmonised European approach, we are of the opinion that the way of implementing CBTA, as currently proposed by this NPA, may not be the most adequate way and will not allow to pursue the objective of <u>flexibility</u> in the training of ATCOs, which is the aim of the CBTA principle itself. Indeed, it seems to us that the objective cannot be achieved if, as it is the case in the current proposal, <u>*certain aspects*</u> are settled in a binding manner, thus running the risk of becoming obsolete relatively quickly. This is particularly true for the list of competence to be reached and the list of observational behaviours (Obs), which should be better placed in guidance material. It also seems to us that the current

proposal makes not sufficient reference to the need to take account of the <u>local environment</u> (in term of trafic, noise restriction due to densely populated area, etc), which differs significantly from the principles of the CBTA as developed by the ICAO. This is particularly worrying considering the significant differences between the various states across Europe.

Furthermore, as far as unit training is concerned, the current proposal requires them to develop their own <u>course</u>, and we think that a more clear link should be made with what has been developed by the ICAO.

Finally, with the current proposal CBTA is applied to all phases of <u>training</u>, whereas ICAO developed CBTA rather for continuation training. The approach of extending CBTA to all phases does not seem adequate to us, will pose difficulties for practical application and is not aligned with the approach adopted by the ICAO in its document 9868.

response	Partially accepted

The basic and rating training competencies and associated observable behaviours, conditions and competency standards are intended as a minimum. The IR and AMC texts are revised to ensure that ITOs have the flexibility to add competencies, observable behaviours and conditions to this minimum. This will ensure that ITOs are able to meet any requirements that are generated from the local environment that are not defined in the minimum.

For unit training, the text is amended to clarify that the ATC Competency Framework contained in ICAO PANS-Training (Doc 9868) is the basis for units to develop their own adapted competency model that is specific to their local environment taking into account the regulatory, operational, organisational and technical requirements. This is in line with the procedures described in Part 1, Chapters 1 and 2 of PANS-TRG (Doc 9868).

For ATCO training and licencing, CBTA may be applicable to all phases of training, as evidenced by the Annex 1 para 4.4.1.3 *Note* that references PANS-Training and the Manual on Air Traffic Controller Competency-based Training and Assessment and the Manual on Air Traffic Control On-the-Job Training Instructor Competency-based Training and Assessment (Doc 10056, Volumes I and II) where the application of CBTA in each phase of training and the training of OJTIs is detailed.

comment	*487*	comment by: *FOCA Switzerland*

We suggest to replace "he" or "she" with "they", as "they" refers to either male, female or gender fluid. This could be more appropriate and easier to use.

response	Noted

EASA follows the initiative on the use of gender-neutral language that shall be gradually implemented, meaning whenever and wherever practically possible and appropriate to implement.

Regarding the subject Regulation, a (future) recast would be the most appropriate way (and best opportunity) to address, among others, gender-specific-language issues.

comment	*595*	comment by: *European Transport Workers Federation - ETF*

The absence of mention of diverging views within the rulemaking group is not in line with the rulemaking procedure nor is it fair for those having expressed clear disagreement nor is this in line with the rulemaking principles.

response	Noted

Diverging views naturally exist within an expert group and have been included in the minutes of the meetings. The NPA mirrors the final outcome the discussions, being the basis for the EASA proposal.

comment	*641*	comment by: *European Transport Workers Federation - ETF*

Where is the impact assessment for this NPA ?

response	Noted

The 'light' impact assessment, as planned and agreed with stakeholders and forecasted in the EPAS, is embedded in the Notice of Proposed Amendment. Details on the expected benefits and drawbacks of the proposed amendments can be found in Section 2.6 of the document.

1.1. How this NPA was developed   p. 7

comment	*118*	comment by: *GdF*

According to Better Lawmaking, an impact assessment should be done if an initiative has significant economic or social impact. As far as we understand, no impact assessment was conducted, which must mean that no significant impact is expected.

We do not agree with this and regard this omission as a breach of the better lawmaking agreement.

response	Noted

The 'light' impact assessment, as planned and agreed with stakeholders and forecasted in the EPAS, is embedded in the Notice of Proposed Amendment. Details on the expected benefits and drawbacks of the proposed amendments can be found in Section 2.6 of the document.

1.3. The next steps   p. 8

comment	*116*	comment by: *GdF*

We believe that EASA may be underestimating the effort required for training organizations to comply with the proposed changes, especially if they fail to consider the feedback requesting greater flexibility.

Based on the information available to us, it is crucial to grant training organizations a reasonable timeframe of approximately five years to adapt. Failing to do so could have a detrimental impact on ATCO training due to the overwhelming increase in workload.

response	Accepted

comment	*176*	comment by: *GdF*

When EASA completes this working package, we would greatly appreciate their efforts in developing training regulations for ATOS (i.e., A/FISOs and others).

response	Noted

2. In summary - why and what   p. 9

comment	*351*	comment by: *TO Austro Control*

The easier acceptance of 3rd party ATCO licences contradicts rating training harmonisation process within the EASA regulation.
A real harmonized rating course can only be done by using a same standardised airspace and a common set of exercises. Doing that would lead to either a low performance standard after the rating training and consequently unit training/ transitional training must be increased or different "Levels" of rating training have to be introduced to fulfil the different needs of the units.

response	Noted

The acceptance of third-country licences shall be on the basis of the previously achieved training and competence. The decision of the acceptance lies with the competent authority after having assessed/achieved the equivalence with the relevant European requirements.

comment	*430*	comment by: *IFATCA*

2.1.1.We have seen this within the UK. Students have been trained at different ITOs, some outside of the UK and students often require training at the unit before commencing unit training.

response	Noted

comment	*596*	comment by: *European Transport Workers Federation - ETF*

This summary is not in line with the terms of reference of the rulemaking task not is it in line with the information shared with rulemaking group members.
Trust in the fair intentions of the rulemakers can not be established this way.

Why is there a need to ensure a more harmonised level of initial training output ?
Where are the evidence of safety issue related to this ?
This summary claims to 'make additional ATCO resources available' : How ? Which ones ? Not a word...
We believe one of the objectives is voluntarily hidden from the public : facilitating a market for initial training for air traffic controllers : while we believe it is crucial to have enough people being trained each year, we believe market principles are not fit for purpose here.
Who benefits from this initiative ?

response	Noted
	Please refer to the Explanatory Note to the NPA to gain further understanding on the rationale of the proposal.

2.1.1. Different performance levels of student ATCOs   p. 10

comment	*82*	comment by: *EPN*

In paragraph 2.1.1 (page 10) examples are described to verify differences in todays training leading to different levels of performance after an IT course. It is somehow indicated in the way it's written, that with the suggested changes <u>all</u> students, no matter from what TO they take their training, will be at the same performance level after the course. This is not the case. The suggested change in the regulation will harmonize the **minimum** level of performance level. Witch is great! However, a lot of ANSPs are asking for additional training during the IT phase to receive students with a higher level of skills for the UT phase. The text sends mixed signals. It's good with harmonized minimum level of performance for the student license and it's also good to push training from Unit to earlier phases to shorten the OJT.

response	Noted

comment	*115*	comment by: *GdF*

Regarding Conclusion:

Based on our experience, the main obstacle to ATCO mobility lies in the language requirements set by member states. ATC units such as Rhein Radar, which do not impose these requirements, have successfully trained ATCOs from various countries without a common performance standard.
Furthermore, ATCO mobility has been functioning smoothly within German-speaking countries for many years.

The proposed implementation of a common performance standard, as envisioned, will only lead to unnecessary bureaucratic obstacles. Furthermore, regions with lower complexity in Europe will incur higher costs for highly qualified students, while ATC providers in busier areas will have to contend with less qualified students compared to the current situation. This proposed implementation, rather than facilitating efficiency and fairness, will create unnecessary hurdles due to increased

bureaucracy. The complexities involved in adhering to a common performance standard will only serve as obstacles that impede progress. Moreover, the impact of this implementation will not be evenly distributed across Europe. Regions with lower complexity levels will bear the burden of paying higher costs to accommodate highly qualified students. This unfair distribution of financial responsibility further undermines the supposed benefits of a common performance standard. Simultaneously, ATC providers in busier areas will face the challenge of working with students who are less qualified compared to the current scenario. This compromises the quality and effectiveness of air traffic control, potentially posing risks to safety and efficiency. In conclusion, the proposed implementation of a common performance standard is deeply flawed. It introduces unnecessary bureaucracy, imposes unequal financial burdens, and compromises the competence of ATC providers. A more balanced and comprehensive approach is required to ensure efficiency, fairness, and the highest standards of air traffic control in Europe.

response	Noted

comment	*117*	comment by: *GdF*

"Aside from the disparity between licensing standards, one of the risks for European air navigation services providers (ANSPs) when they need to meet capacity demands is a shortage of qualified ATCOs. Failure rates of applicants undertaking ATCO training and the duration of ATCO training, in particular unit training, shall be considered as contributing factors."

While we agree with the general statement, it is imperative to question the reason for a lack of ATCOs. How many ATC providers have stopped training in 2020 and fired ATCOs?

response	Noted

comment	*256*	comment by: *EUROCONTROL*

"…where they can first work independently (first endorsement)."
Is 'endorsement' correct? Our understanding is that a rating is required to work independently.
Proposed change:
Consider replacing "endorsement" by "rating".

response	Not accepted

Endorsement is correct. Rating is required but an ATCO cannot work independently without holding the unit endorsement in question.

comment	*284*	comment by: *EUROCONTROL*

Conclusion - agree
Perhaps the next review of the ATCO Regulation could look at the harmonisation of the pre-OJT phase to reduce the fragmentation not only between States but also within the same ATSP.

response	Noted

comment	*431*	comment by: *IFATCA*
response	Noted	

comment	*597*	comment by: *European Transport Workers Federation - ETF*

Where is the safety concern here ? Where are the evidence ?

'It would seem that the majority of ANSPs may be able to close any staff shortage gaps by improving the pass rate' Such a statement is irresponsible coming from a safety regulator : it questions the very need for an evaluation. The number of recruits should be adapted based on the pass rate to make sure to have enough people succeeding the training. With such a statement it seems that the ability of the student to undergo unit training is completely forgotten while it is the main objective.

'this fragmentation has led to vastly different training programmes being implemented across Europe' : where is the evidence that this will be changed with this NPA ?

'Future operations would require ATC training and ATCOs' performance to also converge' : how ? why ? Where is the evidence ?

'EASA is attentive to the needs of its stakeholders' : clearly more some than others : not a word in all this document about the social consequences of an increase competitive market for initial and rating training...

' There will be no training and assessment improvement if there is not further harmonisation of the initial training' how ? Why ? Where is the evidence ?

response	Noted
	Please refer to the Explanatory Note to the NPA to gain further understanding on the rationale of the proposal.

comment	*598*	comment by: *European Transport Workers Federation - ETF*
	'This, in turn, will facilitate individual ATCO mobility.' How ? Where is the evidence ? it may facilitate it or it may not... Clearly not a valid rulechanging justification...	
response	Noted	
	Please refer to the Explanatory Note to the NPA to gain further understanding on the rationale of the proposal.	

2.1. Why we need to amend the rules - issue/rationale   p. 10

comment	*350*	comment by: *TO Austro Control*

ad System based ATCO Licensing:
At the moment there is no system available to support an ATCO to that extend which is needed that it would not be necessary that the ATCO knows local procedures or in case of emergencies geograghical landmarks, airports, etc.
In the ENRO Upper Airspace, it might be rather possible than in ENRO Lower Airspace or TERM Airspace.

response	Noted

comment	*642*	comment by: *NSA Austria*

At the moment there is no system available to support an ATCO to that extent, that it would not be necessary that the ATCO knows local procedures or, in case of emergencies, geographical landmarks, airports, etc.
In the ENRO Upper Airspace it might be rather possible than in ENRO Lower Airspace or TERM Airspace.

response	Noted

2.1.5. ICAO and the CBTA   p. 13

comment	*1*	comment by: *DFS Deutsche Flugsicherung GmbH*

The introduction of performance standards using the ICAO principles of the CBTA is the chosen way to harmonise the currently different performance levels of student ATCOs as explained in 2.1.1.
The introduced description in regard of traffic load and complexity is a great tool to equalize the performance levels in Europe.

DFS is already making extensive use of the CBTA method in order to efficiently prepare trainees for the required working conditions in Germany.
This, however, does not fully concur with the goal of a European-wide harmonised training.

For example: the competencies are the same throughout our basic, rating and unit training, all focusing on required working positions after receipt of the licence (13 in number, whereas the EASA provision counts for 7 in basic-, 10 in rating- and an adaptable choice of those 10 in unit training).
A change in the number of competencies per training would require 48 months of refresher training without any benefit to the students.

We will not comment with a demand to change the principle of CBTA and the regulatory level.
There is a way to find adaptation to the new European level. **We want to indicate that this is in summary costly but only due to the idea of harmonisation.**

The differences that we would need to implement to achieve the EU-wide comparability of students require adaptation of our documentation, negotiation of approvals by the local work council, and finally familiarisation/refreshing of all instructors and assessors as well as OJTIs with the new structures. This will be time-

consuming. A well planned schedule and timely available AMC/GM would be essential.

Some of these provisions clearly set a barrier or lower level to our need of education, not least to also fulfil our key performance objectives for capacity in Regulation Period 4. There's effectively no change in benefit to the student but huge loss of benefit for DFS. Instead of tailoring the competencies, performances and conditions to the operational need, we now would need to train scenarios which a DFS student will never operate in life in Germany.

And finally, we want to highlight in this context, that a huge hurdle to "ATCO mobility" is rather the language barrier than the basic training. In almost all Member States the local native language is required in addition to English.

response	Noted
	The introduction of a European adapted competency model associated with the student ATC licence (split across the IR and AMC) is intended to ensure a minimum, defined and known level of performance related to their ability to manage complex and dense traffic situations. It is not the intention of the IR/AMC to limit ITOs ability to prepare their student ATCOs for eventual unit training in their environment. The IR text has been amended to clarify that the requirements in ATCO.D.035 are a minimum and that more is possible. The AMC detailing the conditions and competency standards for each rating will be revised to clarify that the requirement is a minimum. References to the 'example airspace' have been deleted so as to that there is no room for misinterpretation that ITOs are required to develop a training airspace of these dimensions. The conditions have been amended to enable more flexibility e.g. the requirements on the classification of airspace to be used have been revised. It does however remain true that with this proposal that effort will be required to familiarise instructors and assessors with the application of the CBTA methodology.

comment	*83*	comment by: *EPN*
	Great to acknowledge the maturity of European TO and also be in the forefront for further development within training.	

response	Noted

comment	*119*	comment by: *GdF*
	EASA has chosen to implement the details of the CBTA on IR and AMC level, with no flexibility. As far as we understand, ICAO gives flexibility on its source material.	
	Instead of the "One Size Fits Nobody"-approach proposed in this NPA, we will propose some changes to increase flexibility and adaptability, while implementing ICAO-compliant CBTA.	

response	Noted

To support the real mutual recognition of the ratings, the initial training required further harmonisation. The same flexibility as provided by ICAO is provided for unit training.

comment	352	comment by: *TO Austro Control*

The introduction of performance standards using the ICAO principles of the CBTA was the chosen way to harmonise the currently different performance levels of student ATCOs as explained in 2.1.1.
The introduced description in regard of traffic load and complexity is a great tool to equalize the performance levels in Europe.

The CBTA are a way of training that helps the ATCO student to reach that level but that level is achievable with other training methods as well.

There is a need to have more options in achieving the same objectives.

response	Noted

The expert group discussed various options to reach the overall objective of harmonisation. The NPA describes the chosen method with the corresponding reasoning.

comment	600	comment by: *European Transport Workers Federation - ETF*

ICAO framework enables much more flexibility than this proposal.

response	Noted

To support the real mutual recognition of the ratings, the initial training required further harmonisation. The same flexibility as provided by ICAO is provided for unit training.

comment	643	comment by: *NSA Austria*

The introduction of performance standards using the ICAO principles of the CBTA was the chosen way to harmonise the currently different performance levels of student ATCOs as explained in 2.1.1.
The introduced description in regard of traffic load and complexity is a great tool to equalize the performance levels in Europe.

The CBTA are a way of training that helps the ATCO student to reach that level but that level is achievable with other training methods as well.

There is a need to have more options in achieving the same objectives.

response	Noted
	The expert group discussed various options to reach the overall objective of harmonisation. The NPA describes the chosen method with the corresponding reasoning.

2.1.4. Acceptance of licences from third countries   p. 13

comment	*432*	comment by: *IFATCA*
	With 3rd country ATCO licences being accepted for conversion, is there a possibility of this process being taken out of the EU? Training for cheaper somewhere else? Then converted on the return to EU licence? Is there a system to prevent this occurring?	

response	Noted
	Acceptance requests shall be evaluated on an individual basis by the relevant competent authority and shall be based on the proven equivalence.

comment	*599*	comment by: *European Transport Workers Federation - ETF*
	While we welcome this possibility, we would like to ensure that we have reciprocity as a condition as well.	

response	Noted
	Reciprocity, being potentially an obligation on other States, is to be handled through other legal instruments. Such clauses are not subject to the delegated act under discussion.

2.3. How we want to achieve it - overview of the proposed amendments   p. 14

comment	*172*	comment by: *GdF*
	We have observed a concerning trend within this NPA, where there is a tendency to excessively burden the "hard law" component of the regulation. This overemphasis on the hard laws, which are the binding legislative provisions, can lead to several detrimental outcomes. In our viewpoint, SERA Section 14 stands out as an exemplary illustration of sound lawmaking. The concise and precise presentation of the hard laws ensures clarity and ease of implementation. It allows for efficient navigation and understanding of the regulatory requirements. Moreover, the supplementary guidance provided through AMCs and GMs ensures that any necessary elaboration or clarification is offered in a structured and supportive manner. This approach strikes a balance between providing clear rules and allowing flexibility in implementation. However, in contrast, we have encountered multiple IRs in this NPA that, in our assessment, suffer from unnecessary bloating. This occurs when the content of an IR	

is needlessly repeated and duplicated in subsequent AMCs, resulting in an inflated regulatory framework. Not only does this redundancy create confusion and ambiguity, but it also burdens stakeholders with the need to sift through excessive information. This can hinder efficient compliance and impede the smooth implementation of the regulation.

To improve both the flexibility and technical quality of the lawmaking process, we will be proposing amendments later in this document. Our proposed changes aim to streamline the regulatory framework by eliminating redundant and repetitive content. By doing so, we can enhance the clarity and coherence of the regulation, making it more accessible and user-friendly for all stakeholders. This will facilitate a more efficient and flexible implementation process across member states.

In conclusion, striking the right balance between concise hard laws and supplementary guidance is crucial for effective lawmaking within this NPA. By addressing the issue of unnecessary bloating and duplication, we can ensure a more streamlined and coherent regulatory framework that supports clarity, flexibility, and efficient implementation.

| response | Noted |

| **2.3.1. Different performance levels of student ATCOs** | p. 14 |

| comment | *320* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

DGAC FR do wish a common level of ATCO competency is to be reached over Europe. DGAC takes note that "in unit training the conditions and standards become specific to the local operational environment, and the competency models should be adapted accordingly by the training organizations" (Summary page 15).
Nevertheless, French ANSPs will not be in capacity to put that into place CBTA in Unit competence scheme in the current period. Their unit training teams are facing other safety, cost savings and ecological issues that implies all their human resources. French ANSPs will not be able to get all their unit and continuous training plans fully CBTA-compliant in the next five years, they first need to get the modernization of their ATM systems fulfilled (security), train and qualify an increasing amount of ATCO (urge wave of retirement to overcome) and focus on continuous descent and ecological issues. This work needs to be done after modernization to avoid having to do it twice.
As a consequence, DGAC FR suggests reformulating CBTA with an aim to fulfill the regulation with a 5-year transition period.

| response | Accepted |

| comment | *433* | comment by: *IFATCA* |

There is a real possibility that this would reduce the pass rate for smaller ATSPs. The assessment criteria to enter the ATC profession would need to be suitably adapted to ensure only candidates who are likely to pass the more difficult initial and unit training stages are accepted.

response	Noted
	The mutual recognition of ratings requires truly harmonised training.

2.3.2. Instructors and assessors   p. 15

comment	*321* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	What does "without a valid unit endorsement" mean? Do instructors no longer need to hold valid unit endorsements?
	If it concerns on-the-job training instructors (OJTIs) it is not acceptable because OJTIs must hold a valid unit endorsement.
response	Noted
	The last sentence refers only to STDIs and assessors.

comment	*601* comment by: *European Transport Workers Federation - ETF*
	While the objective to allow experienced assessors to act without STDI or OJTI endorsement is agreed for initial training purposes we do not believe it is safe to introduce it for the training organisations in charge of unit training.
response	Noted
	Please refer to the existing requirement in ATCO.C.045 (e).

2.3.4. Acceptance of licences from third countries   p. 16

comment	*81* comment by: *EPN*
	Question: Will the previous experience of ICAO licence holders count for the purposes of fulfilling the 2 years experience requirment in relation to an applicant OJTI or STDI, or will the person have to get a 340 student ATCO licence, complete a Unit endorsement course and exercise it for 2 years prior to being eligble to apply for an OJTI/STDI?
response	Accepted
	For the purpose of engaging third-country licence holders as instructors and assessors, a similar possibility is proposed as the one available for the instructors and assessors of training organisations outside the EU.
	Apart from holding an ICAO-compliant licence with a rating and rating endorsement corresponding to the instruction or assessment to be provided, they also need to ascertain that they have received training and successfully passed examinations and assessments equivalent to those required by the ATCO Regulation.

comment	*84* comment by: *EPN*
	With the suggested change, it will be easier for a third-country ATCO licence to obtain an EU licence. This is great to support ANSPs in EU where we expect a shortage for

years to come. What about the possibility to become an STDI? Does a third-country ATCO need to go all the way to licenced EU ATCO (including unit endorsement) to be able to work as STDI in a TO? There is a huge demand on STDIs in EU and ANSPs have no possibilities to release operational ATCOs for STDI work. Can an EU student licence + a third-country ATCO licence (=operational experience) be converted to an EU ATCO licence without unit endorsement? If yes, a STDI endorsement could be acheived.

response	Accepted
	Please refer to the response provided for comment #81.

comment	*322*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Shall we understand that training schools will have to demonstrate that their initial training meets the expectations of this new CBTA in order to obtain equivalence with the student licence?	

response	Noted
	The training undertaken by the applicant has to be evaluated by a certified ATCO TO. In this context, the currently applicable European regulatory framework shall always be the baseline.

comment	*434*	comment by: *IFATCA*
	The system of licence conversion places a high burden of responsibility on the competent authorities to ensure they uphold the high standards of the European licence. Where the military licence conversion process seems to place this burden on the Licensing Authorities, the process of converting a 3rd country licence appears to fall on the ITO.	

response	Partially accepted
	The obligation for the acceptance of licences is on the Member States. While in the case of military conversion the national reports to be drawn up shall provide a comparison between the civil and military requirements within a given Member States, in the case of third countries we cannot expect the national competent authorities to possess all relevant information vis a vis all potential third countries. Hence the potential acceptance can only reply on the individual assessment of the training received by the individual applicants, for which initial training organisations are best placed. It has been however clarified that the initiator and driver of the process should be the individual applicant.

2.6.1. Facilitate the implementation of the CBTA

comment	*184*	comment by: *IFATCA*
	page 19 ... implementing the CBTA:	

Whilst IFATCA thinks the general thrust of these possible benefits are worthwhile to note, it would suggest a word of caution.

| response | Noted |

| comment | *459* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

Particular attention must be paid to the training of Authority inspectors, who will be responsible for approving ATCO training programs in the new CBTA format. Requirements for competent authorities in Annex II (Part ATCO.AR) must be developed. Particularly standards for CBTA oversight activities as well as qualification criteria for the involved inspectors from competent authorities will need to be developed. These additional provisions will address the specificities of approval and oversight processes with regard to CBTA.

| response | Noted |

2.6.2. Impact of the CBTA on ATC initial training   p. 17

| comment | *323* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

How is the lowest common denominator defined with regard to the last sentence on p.18?

| response | Noted |

Comment unclear. The last sentence on p. 18 does not refer to any lowest common denominator but rather to the principles of integrated and consistent performance of competencies.

| comment | *353* | comment by: *TO Austro Control* |

Along with the positive feedback on the CBTA implementation, several stakeholders underlined the main challenges and issues to be carefully considered. These are:
*— Time and resources needed for the organisational and cultural change associated with the CBTA implementation. Depending on the size and maturity of the organisation, the **adaptation to the CBTA could take several years;***
According an email of Eduardo Garcia (CANSO) the new directive (and so as well CBTA) will be applicable after a 15-month transition period. This timeframe is much too short, for that big change

| response | Accepted |

| comment | *480* | comment by: *FOCA Switzerland* |

On page 20, 1st paragraph, it is stated that "Unit training developers will know the **minimum** performance level that a student has achieved, irrespectively of where they did their initial training, and be able to tailor the start of their training to this level".

We see a contradiction between "tailoring the start of the training" and taking into account the "minimum performance level of a student". To tailor the start of the training the developpers need to know the actual performance of the students and not only their minimum performance level. If we only take into account the minimum performance level reached by students, there is the risk that students having a higher performance level will not progress.

response	Noted
	Reaching a minimum performance level is required to support harmonisation and mutual recognition.

comment	*602*	comment by: *European Transport Workers Federation - ETF*
	We regret the transposition leaving out the notion of observation which is not for the best safety outcome.	

response	Noted
	Comment not understood.

comment	*603*	comment by: *European Transport Workers Federation - ETF*
	We regret the lack of transparency on the stakeholders anonymously mentioned and question the relevance of feedback with the probable bias of stakeholder selection.	

response	Noted
	Comment not understood.

comment	*604*	comment by: *European Transport Workers Federation - ETF*
	On the question of predictability : this is not an actual issue as contractual arrangements between ITO and ANSPs define the expected standard...	

response	Noted

comment	*605*	comment by: *European Transport Workers Federation - ETF*
	'leads to potential reduction of unit training duration' : likely to be false statement as all elements of contextualisation in future unit context has to be taken out of initial training sylllabus : all these elements will need to be reintroduced in unit training lengthening unit training.	

response	Noted
	Reaching the actual reduction depends on various factors, hence the mention of potential.

comment	*644*	comment by: *NSA Austria*
	Along with the positive feedback on the CBTA implementation, several stakeholders underlined the main challenges and issues to be carefully considered. These are:	

> — *Time and resources needed for the organisational and cultural change associated with the CBTA implementation. Depending on the size and maturity of the organisation, the* <u>**adaptation to the CBTA could take several years;**</u>
>
> **According an email (CANSO) the new directive (and so as well CBTA) will be applicable after a 15-month transition period. This timeframe is much too short, for that big change**

response	Accepted

2.6.4. Virtual training   p. 20

comment	*57* comment by: *GdF*
	Although partial remote theoretical training may have its benefits, remote simulator training falls short of adequately replicating the real-life working environment. Numerous unanswered questions persist, such as how to effectively simulate Executive/Planner-Teamwork or provide appropriate feedback from a coach. We strongly advocate for clear regulations that guarantee the preservation of the student's education without any hindrance before implementing any form of remote training, particularly in practical settings.
response	Noted

comment	*324* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	This notion shall be a *nice to have* and not a *must-have*.
response	Noted

2.7. Stakeholders' views on unit endorsements for remote aerodrome air traffic services provision   p. 21

comment	*3* comment by: *DFS Deutsche Flugsicherung GmbH*
	Question 1: no, not necessary Question 2: Yes, as it is a specific item, that should be shown in the unit endorsement. Question 3: yes, differences of the privileges in multiple mode of operations shall be indicated in the unit endorsement Question 4: yes Question 5:

	yes
response	Noted

comment	*62*	comment by: *LFV*
	Question 1: no Question 2: Yes. Question 3: Yes Question 4: It should be clear what different combination the holder is authorised to provide service for. Question 5: Irrelevant due answer to question 1	
response	Noted	

comment	*149*	comment by: *German NSA (BAF)*
	1: Yes, however location indicators of the aerodrome(s) served still need to be included. 2: Not necessarily "indicated" but the working method (single and/or multiple mode) needs to be an integral part of the description of the unit endorsement(s). 3: cf. answer to question 2. 4: cf. answer to question 2. 5: Normally single mode is part of the training as well, so yes. However an even distribution of exercising all (combinations of) unit endorsements should be ensured which is addressed in the relevant parts of this NPA.	
response	Noted	

comment	*195*	comment by: *Estonian Transport Administration*
	Paragraph 2.7. 1. No 2. Yes 3. Yes 4. Yes 5. Yes	
response	Noted	

comment	*217*	comment by: *CANSO*
	Unit endorsement for remote TWR service Is it necessary to have two different endorsements for remote tower and physical tower at the same airport?	

For example, during a transition period (e.g., 1 - 1.5 years), both remote and physical towers could be operational.

response	Noted

comment	*257*	comment by: *BCAA*

1. Not necessarily, focus should be on the unit of the airport for which ATC is performed.

2. Yes, the unit endorsement should be unambiguous as to what privileges the ATCO has an under which condition they may work.

3. Yes, see above.

4. Yes, though limitations can be added.

5. Yes, though the option to add the single unit endorsements next to the multiple mode unit endorsement is equally good

response	Noted

comment	*354*	comment by: *TO Austro Control*

Question 1:
no, not necessary

Question 2:
Yes, as it is a specific item, that should be shown in the unit endorsement

Question 3:
yes, differences of the privileges in multiple mode of operations shall be indicated in the unit endorsement

Question 4:
yes

Question 5:
yes

response	Noted

comment	*397*	comment by: *Naviair*

Unit endorsement for remote TWR service

Is it necessary to have two different endorsements for remote tower and physical tower at the same airport?

For example, during a transition period (e.g., 1 - 1.5 years), both remote and physical towers could beoperational.

response	Noted

comment	*444*	comment by: *AESA*

1. We think that information should be in the licence. Perhaps with the unit endorsement or as an additional comment.
2. Same comment as for point 1.
3. It should be clear in some documentation. Perhaps only in training documentation, not in the licence.
4. It will depend on how the training is estructured. It is similar to the current situation with ACCs., where the unit endorsement can cover all the sectors or there could be different unit endorsements for different sectors.
5. It depends on how the training is structured.

response	Noted

comment	*583*	comment by: *Fintraffic Air Navigation Services*

1. **Should the remote centre location indicator be used in the unit endorsement?**

Yes, RTC name should be used as the location indicator in the unit endorsement. The RTC will most likely be considered a separate unit within the ANSP just as any aerodrome. The use of RTC name as the location indicator would allow for simpler procedures in maintaining the unit endorsement. If each aerodrome operated from an RTC will have its own location indicator in the unit endorsement, this will cause unnecessary complications to UTP/UCS and other documentation. If an RTC is used as location indicator, the ANSP is still required to ensure the controllers competence in each working position/sector/(aerodrome) they are providing services.

2. **Should the privilege to provide services in multiple mode of operation be indicated by the unit endorsement?**

Not necessarily. If the RTC is to provide services in multiple mode, this mode of operation shall be covered in the operational manuals as well as (unit) training phase. Indicating the privilege to provide services in multiple mode in the license itself will not bring any real benefits.

3. **Should the combination of different aerodromes attended simultaneously from one remote tower module be indicated in the unit endorsement(s)?**

No. This would only bring possible limitations to the use of personnel in the RTC environment. This should be left to the consideration of the ANSP (subject to local safety case and approval from the local CA) taking into account the operational environment. If limiting the combinations is considered necessary by the ANSP, they can and should introduce for example "aerodrome groups" to be indicated in the license.

4. **Should a unit endorsement for the remote service provision in multiple mode of operation for a group of aerodromes authorise the holder to provide air traffic control services for any combination of the aerodromes included in that unit endorsement?**

Yes. This should be left to consideration of the ANSP (subject to local safety case and approval from the local CA) taking into account the operational environment.

5. **Should a unit endorsement for the remote service provision in multiple mode of operation for a group of aerodromes also authorise the holder to provide air traffic control services in single mode for any of the aerodromes included in that unit endorsement?**

Yes. Single mode of operation should be considered as one of the normal operating modes as any other combination.

response	Noted

comment	*606* comment by: *European Transport Workers Federation - ETF*
	An NPA under RMT 0668 raised this issue and this line of questions is perceived as a way to change an outcome which did not satisfy some individuals. We believe that the feedback provided so far should be sufficient.
response	Noted
	The replies to this RMT and to RMT.0624 are being reviewed in combination. The reason for including the same questions in two processes was to obtain as much feedback as possible.

comment	*645* comment by: *NSA Austria*
	Question 1: no, not necessary Question 2: Yes, as it is a specific item, that should be shown in the unit endorsement Question 3:

yes, differences of the privileges in multiple mode of operations shall be indicated in the unit endorsement

Question 4:
yes

Question 5:
yes

response	Noted

2.6.5. Acceptance of licences from third countries	p. 21

comment	*435*	comment by: *IFATCA*
	ATCO shortages are worldwide and this will just shift the problem. However, it could be an enabler to enhance licence recognition worldwide.	
response	Noted	

comment	*607*	comment by: *European Transport Workers Federation - ETF*
	We request a reciprocity rule to be introduced as a condition.	
response	Noted	

Article 4 Definitions	p. 23

comment	*37*	comment by: *Croatian Civil Aviation Agency*
	The comment is about article 4 (7c).	
	The evaluation is missing in the definition. According to definition for "evaluation" it means a determination by an instructor or assessor as to whether a person meets a required <u>competency standard</u> under given condition…	
	Proposal: (7c) 'competency standard' means a level of performance that is defined as acceptable when assessing or evaluating whether or not competency has been achieved.	
response	Noted	
	The proposal to introduce the term 'evaluation' has been withdrawn.	

comment	*38*	comment by: *Croatian Civil Aviation Agency*
	The comment is about article 4 (18).	

The evaluation is missing in the definition.
According to definition for "evaluation" it means a determination by an instructor or assessor as to whether a person meets a required competency standard under given condition…

Proposal:
(18) 'performance criteria' means statements used to assess or evaluate whether the required levels of performance have been achieved for a competency. A performance criterion consists of an observable behaviour, condition(s) and a competency standard.

response	Noted
	The proposal to introduce the term 'evaluation' has been withdrawn.

comment	*58*	comment by: *GdF*
	"The assessment leads to the issue of the licence" Please check if it should be "issuance". (please see 6 and 7b)	
response	Noted	
	The terms 'issue' and 'issuance' are synonyms is this sense. As regards the text of the ATCO Regulation, for consistency reasons, the former is selected.	

comment	*85*	comment by: *EPN*
	Definitions (9a) "evaluation" - the last sentence "*Evaluation can be done in a continous manner during training".* What added value does this sentence give? If needed the same should be written in (6) "assessment".	
response	Noted	
	The proposal to introduce the term 'evaluation' has been withdrawn.	

comment	*150*	comment by: *German NSA (BAF)*
	Definition (6) 'assessment'	
	Proposal: Add a GM to this definition to prevent misinterpretation with regard do the type of evalution required for the revalidation of STDI, OJTI and Assessor endorsements.	
response	Accepted	
	The definitions of assessment and of assessor endorsement have been amended.	

comment	*151*	comment by: *German NSA (BAF)*
	Defintion (21a) 'remote learning'	

'remote learning' means a reflection of the training situations in which instructors and students are physically separated and interact synchronously or asynchronously. Information is typically transmitted via technology means, such us as discussion boards, video conference, audio bridge or data carrier, and other similar means;"
Proposal: delete "a reflection of the" as this seems to be surplus

response	Accepted

comment	*180*	comment by: *CroControl*

TEXT:

(7c) 'competency standard' means a level of performance that is defined as acceptable when assessing whether or not competency has been achieved.

COMMENT:

(7c) 'competency standard' means a level of performance that is defined as acceptable when assessing <mark>or evaluating</mark> whether or not competency has been achieved.

response	Noted The proposal to introduce the term 'evaluation' has been withdrawn.

comment	*181*	comment by: *CroControl*

TEXT:

(18) 'performance criteria' means statements used to assess whether the required levels of performance have been achieved for a competency. A performance criterion consists of an observable behaviour, condition(s) and a competency standard.

COMMENT:

(18) 'performance criteria' means statements used to assess <mark>or evaluate</mark> whether the required levels of performance have been achieved for a competency. A performance criterion consists of an observable behaviour, condition(s) and a competency standard.

response	Noted

The proposal to introduce the term 'evaluation' has been withdrawn.

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comment | *240* comment by: *CANSO*

Article 4 Definitions

(6) 'assessment' means ~~an evaluation~~ a determination by an assessor as to whether a person meets a required competency standard ~~of the practical skills~~ under given conditions, by collecting evidence from observable behaviours. The assessment lead~~sing~~ to the issue of the licence, rating and/or endorsement(s) and their revalidation and/or renewal, including behaviour and the practical application of knowledge and understanding being demonstrated by the person being assessed.

> **Note**: Basic training does not lead to the issuance of a licence, etc. Whilst the modified meaning of assessment in Article 4 (6) refers to the issuance of a licence, etc. Therefore, the terminology of assessment in ATCO.D.025 Basic training examinations and assessment is misleading.

response | Accepted

The definitions of assessment and of assessor endorsement have been amended.

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comment | *252* comment by: *CANSO*

assessment definition
Proposal: add the possibility to have continuous assessment. Can an assessment also be on theoretical knowledge in which case this is also missing?
Explanation: should be aligned to the definition of evaluation

response | Accepted

The definitions of assessment and of assessor endorsement have been amended. The assessment does not include theoretical examination, but it does include the practical application of knowledge and understanding.

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comment | *316* comment by: *Europe Air Sports*

EAS notes that the NPA adds several new definitions compared to the current ATCO Regulation ((EU) 2015/340).

While a check against the Definitions clause (Article 3) of the Basic Regulation (2018/1139) uncovered no notable contradictions, we note that there is a risk that

the same term may have different meanings in different Implementation Regulations. As an example, a quick check against the Flight Crew Licencing regulation (1178/2011) showed that the term 'credit' is defined slighly different.

EAS suggests a harmonisation exercise between IRs to ensure that definitions are similar.

Some of the definitions raise questions:

1. 'renewal' and 'revalidation'. For some reason the text for these definitions do not apply for 'ratings' anymore (the word 'rating' is deleted).

This is confusing, and may lead the reader to believe that 'ratings' are now taken away, or alternatively made non-renewable or not subject to revalidation, while no change is made for 'endorsements'. (This impression is, however, contradicted by the many other provisions mentioning ratings and endorsements. But the result remains somewhat unclear.)

EAS suggests a clarification on this point.

2. 'competency standard'. EAS wonders how, in effect, this new definition differs from just a 'prescriptive requirement' ?

response	Noted

While the parallelism with the FCL regulation is welcomed, the definition of 'credit' had been already commented and agreed within the previous amendment of the Regulation (EU) 2015/340, through Regulation (EU) 2023/893.

As indicated in Article 4, the definitions contained in this Regulation are solely for the purposes of this Regulation.

For renewal and revalidation, the ratings were removed through Regulation (EU) 2023/893 due to the fact that they continue to be valid by revalidating or renewing the unit endorsements. A rating(s) once obtained is valid for lifetime.

The competency standard definition is to align with the CBTA principles and the necessary modifications introduced within the NPA.

comment	*355*	comment by: *TO Austro Control*

(28) 'training course' means theoretical and/or practical instruction developed within a structured framework and delivered within a defined duration **or until reaching the necessary competence**;

Comment: taking the new CBTA Approach into account

response | Partially accepted

The proposed text is already in line with the intent of the comment, which is to provide the possibility to complete the training earlier, within the defined duration.

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comment | *398* | comment by: *Naviair*

Article 4 Definitions

(6) 'assessment' means ~~an evaluation~~ a determination by an assessor as to whether a person meets a required competency standard ~~of the practical skills~~ under given conditions, by collecting evidence from observable behaviours. The assessment leads~~ing~~ to the issue of the licence, rating and/or endorsement(s) and their revalidation and/or renewal, including behaviour and the practical application of knowledge and understanding being demonstrated by the person being assessed.

Note: Basic training does not lead to the issuance of a licence, etc. Whilst the modified meaning of assessment in Article 4 (6) refers to the issuance of a licence, etc. Therefore, the terminology of assessment in ATCO.D.025 Basic training examinations and assessment is misleading.

response | Accepted

The definitions of assessment and of assessor endorsement have been amended.

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comment | *399* | comment by: *Naviair*

assessment definition
Proposal: add the possibility to have continuous assessment. Can an assessment also beon theoretical knowledge in which case this is also missing?
Explanation: should be aligned to the definition of evaluation

response | Accepted

The definitions of assessment and of assessor endorsement have been amended. The assessment does not include theoretical examination, but it does include the practical application of knowledge and understanding.

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comment | *460* | comment by: *IAA*

(7) 'assessor endorsement' means the authorisation entered on and forming part of the licence, indicating the competence of the holder to assess the <u>practical skills of student air traffic controller and air traffic controller</u>;

Suggested editorial change to underlined text above. Two options:

`practical skills of a student air traffic controller and an air traffic controller;`
or

`practical skills of student air traffic controller<mark>s</mark> and air traffic controller<mark>s;</mark>`

response	Accepted
	The text has been modified as suggested.

comment	**471**	comment by: *EDA*

'remote learning' means a reflection of the training situations in which instructors and students are physically separated and interact synchronously or asynchronously. Information is typically transmitted via technology means, such us as discussion boards, video conference, audio bridge or data carrier, and other similar means;

In this definition, the meaning of the word "reflection" is not very clear. It might be deleted.

response	Accepted

comment	**481**	comment by: *FOCA Switzerland*

Regarding the definition of "assessment" we suggest to clearly mention the possibility to have <u>continuous assessment</u>. Indeed, the current proposal seems to focus only on dedicated assessments. We are of the opinion that having continous assessments cleary mentionned in this definition is important and will ensure alignement with the definition of "evaluation", which clearly mentions the continuous evaluations.

Furthermore, we wonder if an assessment can also be performed for <u>theoretical knowledge</u>: if yes, this should be clearly mentionned in the definition.

response	Accepted
	The definitions of assessment and of assessor endorsement have been amended. The assessment does not include theoretical examination, but it does include the practical application of knowledge and understanding.

comment	**608**	comment by: *European Transport Workers Federation - ETF*

Definition of assessment : the collection of evidence from observable behaviours works in a controlled environment (ie simulation) far less in live ATC and we believe this should be reflected by introducing 'as far as practicable' between 'collecting' and 'evidence'.

response	Not accepted
	The proposed definition is aligned with the one used by ICAO.

comment	**609**	comment by: *European Transport Workers Federation - ETF*

Definition of evaluation blurs the difference between evaluation and examination : evaluation should be conducted to help the learning process while examination

determines whether the learning process was a success or not. We suggest this addition :
Evaluations are conducted to help the learning process and put in place measures to improve its success probability.

response	Noted
	The proposal to introduce the term 'evaluation' has been withdrawn.

comment	*610*	comment by: *European Transport Workers Federation - ETF*
	'remote learning' and 'virtual classroom': there is a need to reference the need for an available actual human being to answer questions. We suggest to add : The availability of an instructor to answer questions steming from remote learning/virtual classroom content should be ensured.	
response	Not accepted	
	The definition should be limited to the terms 'remote learning' and 'virtual training' to maintain clarity and focus on the specific context of these educational methods.	

comment	*646*	comment by: *NSA Austria*
	(28) 'training course' means theoretical and/or practical instruction developed within a structured framework and delivered within a defined duration **or until reaching the necessary competence**;	
	Comment: taking the new CBTA Approach into account	
response	Partially accepted	
	The proposed text is already in line with the intent of the comment, which is to provide the possibility to complete the training earlier, within the defined duration.	

comment	*656*	comment by: *Romanian CAA*
	Text NPA	
	'evaluation' means a determination by an instructor or assessor as to whether a person meets a required competency standard under given conditions, by collecting evidence from observable behaviours, knowledge and understanding. Evaluation can be done in a continuous manner during training.	
	Proposed text	
	'evaluation' means a determination by an instructor or assessor as to whether a person meets a required competency standard under given conditions, by collecting evidence from observable behaviours, practical knowledge and understanding. Evaluation can be done in a continuous manner during training on synthetic training device or in other simulated environment sessions.	
	Justification	
	1) The way of this definition is phrased, it shows that knowledge and understanding are highlighted during practical training to observe competency standard under	

given conditions on synthetic training device or in other simulated environment sessions, as it is specified at
GM1 ATCO.B.025(a)(9̶1̶0̶).
2) Introducing the notion of *„practical knowledge and understanding",* it clearly delineates from the definition of (10) „examination" which refers to theoretical knowledge and understanding as well as eliminates confusion.
3) Practical knowledge and theoretical knowledge are two completely distinct approaches to knowledge. While theoretical knowledge may guarantee that you understand the fundamental concepts and have know-how about how something works and its mechanism, it will only get you so far, as, without practice, one is not able to perform the activity as well as he could. Practical knowledge guarantees that you are able to actually do something instead of simply knowing how to do it.
4) The notion of *„theoretical knowledge and understanding"* is used along the NPA (see ATCO.B.025(a)(9), AMC1 ATCO.B.025(a)(5);(6);(9), etc).

response	Noted
	The proposal to introduce the term 'evaluation' has been withdrawn.

comment	*657*	comment by: *Romanian CAA*

Text NPA
'examination' means a formalised test evaluating the person's knowledge and understanding;

Proposed text
'examination' means a formalised test evaluating the person's theoretical knowledge and understanding;

Justification
1) Introducing the notion of „theoretical knowledge and understanding", it clearly delineates from the definition of (9) „evaluation" which refers to practical knowledge and understanding as well as eliminates confusion.
2) The notion of „theoretical knowledge and understanding" is used along the NPA (see ATCO.B.025(a)(9), AMC1 ATCO.B.025(a)(5);(6);(9), etc)

response	Noted
	The proposal to introduce the term 'evaluation' has been withdrawn.

3. Proposed amendments and rationale in detail   p. 23

comment	*214*	comment by: *DFS Deutsche Flugsicherung GmbH*

For the drafting of the Opinion and associated IR for these measures we suggest a 5 year transition period. This would help in performing the required changes, amendments and adaptations in documentation, work council negotiation as well as teaching the new training principles to all training staff (instructors, OJTIs, assessors).

response	Accepted

ATCO.A.015 Exercise of the privileges of licences and provisional inability   p. 28

comment	*611*	comment by: *European Transport Workers Federation - ETF*
	We are opposed to the proposed change here : provisional inability is also useful in a initial training organisation.	
response	Not accepted	
	The changes are minimal and do not affect the content (in terms of wording. The content has been as is since 2015.	

ATCO.B.001 Student air traffic controller licence   p. 29

comment	*39*	comment by: *Croatian Civil Aviation Agency*
	The comment is about point (b)(2). Text proposal: within the 12 months preceding the application, have successfully completed initial training and demonstrated the required competence at a training organisation satisfying the requirements laid down in Annex III (Part ATCO.OR) and Annex I (Part ATCO), Subpart D, Section 2. The reason is to have more clear and understandable text. The proposed text now covers the whole initial training requirements, not as it could be read, only the rating training and demonstration of required competence for rating training only.	
response	Noted	
	The text has been as is since 2015 and it sets the timeframe for application for student ATCO. In the past it covered the full initial training; today it covers the same requirement.	

comment	*182*	comment by: *CroControl*
	TEXT: within the 12 months preceding the application, have successfully completed initial training at a training organisation satisfying the requirements laid down in Annex III (Part ATCO.OR) relevant to the rating, and if applicable, to the rating endorsement, as set out in Part ATCO, Subpart D, Section 2 and demonstrated the required competence, as set out in ATCO.D.035; COMMENT: Text not clear enough and understandable. Text now covers the whole initial training requirements, not as it could be read, only the rating training and demonstration of required competence for rating training only.	

response	Noted
	The text has been as is since 2015 and it sets the timeframe for application for student ATCO. In the past it covered the full initial training; today it covers the same requirement.

ATCO.B.005 Air traffic controller licence   p. 29

comment	*40*	comment by: *Croatian Civil Aviation Agency*
	The comment refers to point (c)(2).	
	Text proposal: (2) have completed a unit endorsement course in accordance with the requirements set out in Part ATCO, Subpart D, Section 3 and demonstrated the required competence, as set out in ATCO.D.060.	
	Explanation: Text to be aligned with ATCO.B.020 (b). Demonstration of the required competence is done through examinations and assessments, so it is unnecessary to point out both, the examination and assessment and demonstration of required competence.	
	If this proposal will not be accepted, then the word "evaluations" is to be added to be aligned with point ATCO.D.070, because the word "assessment" is replaced with word "evaluation" for the pre-on-the-job phase.	

response	Partially accepted
	The wording has been aligned with that of point ATCO.B.020(b). In addition, the term 'evaluation' is not used in point ATCO.D.070 any more.

comment	*147*	comment by: *EPN*
	ATCO.B.005 (2) - 'have completed a unit endorsement course, successfully **completed** the appropriate ..	
	We would use 'completed' as opposed to 'passed', as you can't unsuccessfully pass an exam.	

response	Partially accepted
	The wording has been aligned with that of point ATCO.B.020(b), which means deletion of 'successfully passed'.

comment	185	comment by: *CroControl*

TEXT:

(2) have completed a unit endorsement course, successfully passed the appropriate examinations and assessments in accordance with the requirements set out in Part ATCO, Subpart D, Section 3 and demonstrated the required competence, as set out in ATCO.D.060;

COMMENT:
(2) have completed a unit endorsement course in accordance with the requirements set out in Part ATCO, Subpart D, Section 3 and demonstrated the required competence, as set out in ATCO.D.060.

Text to be aligned with ATCO.B.020 (b).
Demonstration of the required competence is done through examinations and assessments, so it is unnecessary to point out both, the examination and assessment and demonstration of required competence. Also, the evaluations are missing (if the examinations and assessments will be part of the text) because in the point ATCO.D.070 the word assessment is replaced with word evaluation for the pre-on-the-job phase.

response Accepted

The proposal to align with ATCO.B.020(b) has been accepted.

ATCO.B.010 Air traffic controller ratings p. 29

comment	468	comment by: *EDA*

By skipping the word "*immediately*" it may be understood that the "preceding period" referred to could have happened far away in the past, which cannot/should not be the intention. To leave out ambiguity it is therefore suggested:
to restore the word "immediately",
or to write "the preceding period".

response Not accepted

The text is now clearer.

ATCO.B.020 Unit endorsements p. 30

comment	148	comment by: *EPN*

ATCO.B.020 (i) (2)

	Question - why use 'and' here, and not the previous point if all 3 are points are requirements?
response	Accepted

comment	*152*	comment by: *German NSA (BAF)*
	ATCO.B.020 Unit endorsements (j)	
	The sentence should start with an "If".	
response	Accepted	

comment	*236*	comment by: *CANSO*

	ATCO.B.020 Unit endorsements
	(i) (1)Unit endorsements shall be revalidated if:
	   (3) the applicant's competence has been assessed in accordance with the unit competence scheme not earlier than <mark>3 months prior to</mark> the expiry date of the unit endorsement.
	   AMC1 ATCO.B.020(i)(3) Unit endorsements
	   PRACTICAL SKILLS ASSESSMENT FOR REVALIDATION OF EACH UNIT ENDORSEMENT
	   (a) If the assessment of practical skills is taking the form of a dedicated assessment consisting of a single assessment or a series of assessments, the last assessment declaring the licence holder competent should take place within the 3 months period ~~immediately~~ <mark>preceding</mark> the unit endorsement expiry date.
	   (b) If the assessment of practical skills is taking the form of a continuous assessment by which the air traffic controller's competence is assessed along a defined period, the end of that defined period and the formal conclusion on declaring the licence holder competent should take place within the 3-month period ~~immediately~~ <mark>preceding</mark> the unit endorsement expiry date.
	
	Note: The same wording in the main paragraph and AMC would be better. Later in the regulation about validity the word 'preceding' is used not 'prior to'.	

response	Accepted The text has been aligned.	

comment	*400*	comment by: *Naviair*
	ATCO.B.020 Unit endorsements (i) (1)Unit endorsements shall be revalidated if:	

(3) the applicant's competence has been assessed in accordance with the unit competence scheme not earlier than 3 months prior to the expiry date of the unit endorsement.

AMC1 ATCO.B.020(i)(3) Unit endorsements

PRACTICAL SKILLS ASSESSMENT FOR REVALIDATION OF EACH UNITENDORSEMENT

If the assessment of practical skills is taking the form of a dedicated assessment consisting of a single assessment or a series of assessments, the last assessment declaring the licence holder competent should take place within the 3 months period ~~immediately~~ preceding the unit endorsement expiry date.

If the assessment of practical skills is taking the form of a continuous assessment by which the air traffic controller's competence is assessed along a defined period, the end of that defined period and the formal conclusion on declaring the licence holder competent should take place within the 3-month period ~~immediately~~ preceding the unit endorsement expiry date.

Note: The same wording in the main paragraph and AMC would be better. Later in theregulation about validity the word 'preceding' is used not 'prior to'.

response	Accepted The text has been aligned.

comment	*612* comment by: *European Transport Workers Federation - ETF*
	(j) The proposal prevents any anticipation of revalidation of endorsements which are very useful in the context of pregnancy amongst other examples. This proposal prevents a level playing field between ATCOs when it comes to revalidation of unit endorsement therefore creating discrimination.

response	Accepted

comment	*658* comment by: *Romanian CAA*
	Text NPA (c) As an exception to point (b), the on-the-job training phase in Part ATCO, Subpart D, Section 3 may not be required when the unit endorsement is issued in connection with the issue of a temporary OJTI or temporary assessor authorisation for the same unit. **Proposed text** (c) As an exception to point (b), the on-the-job training phase in Part ATCO, Subpart D, Section 3 may not be required when the unit endorsement is issued in connection with the issue of a temporary OJTI *or temporary assessor* authorisation for the same unit. **Justification** The text without "or temporary assessor" is correct. just add "revalidation" to the point ATCO.C.045 (e): When assessing for the purpose of issue, **revalidation** and renewal of a unit endorsement, and for ensuring supervision on the operational working position, the

	assessor shall also hold an OJTI endorsement, or an OJTI holding the valid unit endorsement associated with the assessment shall be present.
response	Partially accepted First proposal accepted. Adding the word 'revalidation' in ATCO.C.045(e) is not needed because this provision covers situations where the candidate does not hold the unit endorsement.

AMC1 ATCO.B.020(i)(3) Unit endorsements — p. 30

comment	*469*	comment by: *EDA*
	By skipping the word "*immediately*" it may be understood that the "preceding period" referred to could have happened far away in the past, which cannot/should not be the intention. To leave out ambiguity it is therefore suggested: to restore the word "immediately", or to write "the preceding period".	
response	Not accepted The word 'immediately' was removed from all the parts of the regulation to provide for clearer wording.	

GM1 ATCO.B.020(k) Unit endorsements — p. 30

comment	*472*	comment by: *EDA*
	As indicated in other instances, the deletion of the word "immediately" might have negative implications as no clear timeframe is defined any longer.	
response	Not accepted The word 'immediately' was removed from all the parts of the regulation to provide for clearer wording.	

ATCO.B.025 Unit competence scheme — p. 31

comment	*23*	comment by: *ENAC ACTO Program Director*
	ATCO.B.025 (a) (3) => The condition listed under ATCO.B.025 regarding reducing the duration for achieving the minimum competence hours is considered critical for our instructors. If the intent of this IR is to ensure an evenly distribution of hours amongst the counting periods, it should not impose that the minimum number of hours shall be established in the preceding 6 months, as it would mean that up to 4 times the minimum number of hours shall be done in a 12 months period. That's why it should remain a 12 months period.	

response	Not accepted
	The feedback received from standardisation inspections shows that there is not an even distribution of hours over 12 months. It is hoped that with the new period of 6 months, the distribution of the hours would be better reflected than before.
	The required number of hours, which remains defined by the ATSP, will not have to change, only the reference period for calculation that requires adaptation.
	Example: if the requirement was to achieve 150 hours in 12 months, under the new scheme 75 hours should be achieved in 6 months.

comment	*63*	comment by: *LFV*
	ATCO.B.025 (a) 3	
	LFV propose to go back to previous 12 months instead of 6. We understand the purpose to even out the hours throughout the year but ATCO.B.025 (a) 2 together with planning of rooster etc. should be left to ANS-P to manage. To shorten the period of 12 months to 6 months will create an administrative burden and affect other parts like OJTI/Assessor endorsement in a negative way.	

response	Not accepted
	See the response to comment #23.

comment	*64*	comment by: *LFV*
	ATCO.B.025 (a) 9	
	Evaluation instead of assessment. LFV welcomes this change, here and further in the regulation.	

response	Noted

comment	*215*	comment by: *CANSO*
	ATCO.B.025 Unit Competence Scheme (a) 3	
	CANSO is concerned about the proposal to reduce the minimum training period in the competency scheme to 6 months. The added value of this change is unclear, and it will impose significant costs on ANSPs. It may also impact the ability of instructors to meet their minimum hours, for instance, in cases of pregnancy leave, etc.	
	What is the rationale behind shortening the period for achieving minimum competency to 6 months? Are there any safety aspects related to this change?	
	CANSO Members prefer reverting back to the previous 12-month period instead of 6. While we understand the objective of distributing hours throughout the year, aspects like ATCO.B.025 (a) 2 and roster planning should be managed by ANSPs. Reducing the 12-month period to 6 months would create administrative burdens and have negative implications for OJTI/Assessor endorsement.	

response	Not accepted
	See the response to comment #23. The minimum training period is not changed.

comment	*270*	comment by: *BCAA*
	(910) processes for the examination of theoretical knowledge, evaluation and/or the assessment of practical skills acquired of the successful completion during of conversion training according to ATCO.D.085, including pass marks for examinations;	
	--> better to open to "evaluations, examinations or assessments"	

response	Not accepted
	It was meant to include evaluations to allow instructors to carry out evaluations and not to involve assessors.

comment	*347*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	ATCO.B.025(a)(3)	
	DGAC FR does not support the proposal because it will generate major administrative difficulties to handle with in cases of interruptions for medical reasons, for example, in the last 6 months preceding the extension of the unit mention. Furthermore, the condition listed under ATCO.B.025 regarding reducing the duration for achieving the minimum competence hours is considered critical for DGAC FR (ENAC) initial ATCO training organization's instructors.	
	If the intent of this implementing rule (IR) is to ensure an evenly distribution of hours amongst the counting periods, it should not impose that the minimum number of hours shall be established in the preceding 6 months, as it would mean that up to 4 times the minimum number of hours shall be done in a 12-months period.	
	That's why it should remain a 12-months period.	
	Another point is that the benefits of the 6-month deadline are too complex to implement for the military navigation service provider also.	

response	Not accepted
	See the response to comment #23.

comment	*348*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	ATCO.B.025 (a)(9)	
	What is refresher training? Is it the continuation training modules?	

response	Noted
	According to ATCO.D.080(b)

Refresher training shall be designed to review, reinforce or enhance the existing knowledge and skills of air traffic controllers to provide a safe, orderly and expeditious flow of air traffic and shall contain at least:
(1) standard practices and procedures training, using approved phraseology and effective communication;
(2) abnormal and emergency situations training, using approved phraseology and effective communication; and
(3) human factors training.

It is part of the revalidation process.

| comment | *349* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

Rationale - ATCO.B025 and AMC and GM to ATCO.B.025

DGAC FR understand the aim for regularity but french ANSP need 12 months in some seasonal trafic unit.
It will generate major administrative difficulties also to handle with in cases of interruptions for medical reasons, for example, in the last 6 months preceding the extension of the unit mention.
Furthermore, the condition listed under ATCO.B.025 regarding reducing the duration for achieving the minimum competence hours is considered critical for DGAC FR (ENAC) initial ATCO training organization's instructors.
If the intent of this implementing rule (IR) is to ensure an evenly distribution of hours amongst the counting periods, it should not impose that the minimum number of hours shall be established in the preceding 6 months, as it would mean that up to 4 times the minimum number of hours shall be done in a 12-months period.
That's why it should remain a 12-month period.
Another point is that the benefits of the 6-month deadline are too complex to implement for the military navigation service provider also.
DGAC FR agrees to add other criteria on 6 months to demonstrate regularity (an amount in 12 months with a minimum on six months) which can be more efficient.

response | Not accepted

See the response to comment #23.

| comment | *375* | comment by: *SNCTA member of ATCEUC* |

Significant changes are proposed by the text with regard to unit training. CBTA principle for
unit training is supported and a good implementation CBTA principle for unit training will be
an added value.

Nevertheless, the following element should be taken into consideration.
A lack of ATCOs caused high delays before Covid crisis and with the return of previous level
of traffic, news ATCOs are recruited. Unit training department are facing this high number of
new controllers (ab initio mainly).

Adding to this, Unit training departments in ACC, approaches, Towers play also a central role
in the modernization of ATM systems. Continuation trainings have to be developed, organized, planed and provided before and after implementation of new systems. This is
particularly true in DSNA where new Thales ATM system 4F is currently deployed (with the
last ACC equipped in 2026) and future modernization of towers and approaches.

**CBTA principles are essential for future of ATM but a long transitional period of at least 36
months should be offered.**
Modernization is key for some ATSPs and unit training
department could not face additional substantial work without putting in danger modernization effort.

response	Accepted

comment	*387*	comment by: *FABEC TTF*

The condition listed under ATCO.B.025 regarding reducing the duration for achieving the minimum competence hours was considered critical by some of the members. It should be commented on to maintain a period of 12 months.

response	Noted

See the response to comment #23.

comment	*401*	comment by: *Naviair*

ATCO.B.025 Unit Competence Scheme (a) 3

Naviair is concerned about the proposal to reduce the minimum training period in the competency scheme to 6 months. The added value of this change is unclear, and it will impose significant costs on ANSPs. It may also impact the ability of instructors to meet their minimum hours, for instance, in casesof pregnancy leave, etc.

<u>What is the rationale behind shortening the period for achieving minimum competency to 6 months?Are there any</u> safety aspects related to this change?

Naviair prefer reverting back to the previous 12-month period instead of 6. While we understand the objective of distributing hours throughout the year, aspects like ATCO.B.025 (a) 2 androster planning should be managed by ANSPs. Reducing the 12-month period to 6 months would create administrative burdens and have negative implications for OJTI/Assessor endorsement.

response	Not accepted

See the response to comment #23.

comment	445	comment by: *AESA*

It is not clear whether the hours should be verified every 6 months or only the last 6 months before the expiration.

response	Noted

The intention is to verify the achievement of the minimum number of hours in a rolling manner every 6 months.

comment	461	comment by: *IAA*

(a) (3) the minimum number of hours or, in the case of SRA and PAR, the minimum number of approaches, for exercising the privileges of the unit endorsement, for the purpose of ATCO.B.020(i)(1), shall be established for <mark>an</mark> ~~immediately~~ *preceding period of time which shall not exceed 6 months. ~~within a defined period of time, which shall not exceed 12 months, for the purpose of ATCO.B.020(i)(1)~~. For on-the-job training instructors exercising the privileges of the OJTI endorsement, the time spent instructing shall be counted for the maximum of 50 % of the hours required for revalidation of the unit endorsement;*

Suggested editorial change to highlighted text above.

Change `an` to `a`

response	Noted

comment	482	comment by: *FOCA Switzerland*

Point (a)(3) mentions "aperiod of time which shall not exceed **6** months". We suggest to extent to **12** months or to explain why this is only 6 months.

response	Not accepted

See the response to comment #23.

comment	613	comment by: *European Transport Workers Federation - ETF*

(a) (3) this proposal will lead to more interuption of validity of unit endorsement especially in the context of medical conditions preventing an ATCO to exercise the privileges of the licence (surgery, pregnancy,...) We are strongly opposed to such modification for which no justification at all is provided.

response	Not accepted

See the response to comment #23.

comment	659	comment by: *Romanian CAA*

Text NPA
(a) Unit competence scheme(s) shall be established by the air ~~navigation~~ traffic services provider and approved by the competent authority. A unit competence scheme shall include at least the following elements:

----

(3) the minimum number of hours or, in the case of SRA and PAR, the minimum number of approaches, for exercising the privileges of the unit endorsement, for the purpose of ATCO.B.020(i)(1), shall be established for an ~~immediately~~ preceding period of time which shall not exceed 6 months. ~~within a defined period of time, which shall not exceed 12 months, for the purpose of ATCO.B.020(i)(1)~~. For on-the-job training instructors exercising the privileges of the OJTI endorsement, the time spent instructing shall be counted for the maximum of 50 % of the hours required for revalidation of the unit endorsement;

Proposed text

(a) Unit competence scheme(s) shall be established by the air ~~navigation~~ traffic services provider and approved by the competent authority.

A unit competence scheme shall include at least the following elements:

----

(3) the minimum number of hours or, in the case of SRA and PAR, the minimum number of approaches, for exercising the privileges of the unit endorsement, for the purpose of ATCO.B.020(i)(1), shall be established for an immediately preceding defined period of time within the period of the validity of the unit endorsement which shall not exceed 6 months. For on-the-job training instructors exercising the privileges of the OJTI endorsement, the time spent instructing shall be counted for the maximum of 50 % of the hours required for revalidation of the unit endorsement;

Justification

1) Initially, the validity period of unit endorsement is usually established for a period of 1 year, as per AMC1 ATCO.B.020(e).

2) EASA's proposed text will create confusion in understanding the requirement by removing the word "immediately". The immediately preceding defined period of time translates within the period of the validity of the unit endorsement. This is being counted from the first day of validity of unit endorsement and it reaches maximum period of 6 months. After 6 months, this defined period of time translates along the period of validity of unit endorsement until the last day of validity of unit endorsement. In such a way the competence of air traffic controllers is ensured in any defined period of time.

response | Not accepted

The proposal does not exclude the 6 months, but introduces a possibility for less than 6 months.

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comment | *660* | comment by: *Romanian CAA*

ATCO.B.025(b)
Text NPA
In order to comply with the requirement set out in point (a)(3), air ~~navigation~~ traffic services providers shall ~~keep~~ record~~s~~ of the hours during which each licence holder exercises the privileges of his or her unit endorsement working in sectors, group of sectors and/or working positions in the ATC unit and shall provide that data to the competent authorities and to the licence holder

Proposed text

In order to comply with the requirement set out in point (a)(3), air traffic services providers shall record of the hours during which each licence holder exercises the privileges of his or her unit endorsement working in sectors, group of sectors and/or working positions in the ATC unit and shall provide that data, including the total number of hours at any time of each licence holder, to the competent authorities and to the licence holder upon request

Justification
1) Based on the oversight experience the current text leaves room for interpretation and is not obliging the ATS provider to know at all times the total number of hours for each license holder, which can be provided to the competent authority and the license holder (summing up of hours takes time).
2) At the same time, completing this requirement facilitates the supervision of this requirement by the competent authority.

response	Noted
	Such additional requirement requires consultation with the other stakeholders and could therefore be considered at the next update of the Regulation.

AMC1 ATCO.B.025(a)(5);(6) ;(9) Unit competence scheme   p. 32

comment	*16*	comment by: *GdF*
	Request at least GM for (b): "No assessment should be planned if it is known beforehand that an applicant's performance cannot be observed (e.g. large-scale military exercises)." (f) Definitely needs a clarification of seasonal variations. Additionally, we would assume that *every* ATC unit has some variations. Would that mean that no checkouts could be done during summer at a winter-airport? Would propose rephrasing: "Training at ATC units with seasonal variations should include the higher volume and complexity situations."	

response	Noted
	There are behaviours that are not possible to be observed during an assessment. For such cases, it is better to use the simulated environment to assess them.

comment	*41*	comment by: *Croatian Civil Aviation Agency*
	1) Proposal for the titiel of this AMC: PROCESSES FOR ASSESSING COMPETENCE ~~AND~~, EXAMINING THEORETICAL KNOWLEGDE AND UNDERSTANDING AND EVALUATION OF SUCCESSFUL COMPLETION Explanation:	

In the title of this AMC, evaluation of the successful completion is missing because the ATCO.B.025 (a)(5) is about assessment, ATCO.B.025(a)(6) is about examination and ATCO.B.025(a)(9) is about evaluation of successful completion of refresher training.

2) Proposal for reordering the text.

Proposal to define this AMC in right order i.e. that all points related to assessment are together, then examinations, then evaluations, because now is mixed up: (a) and (b) are related to assessments, (c) is related to examinations, (d) is related to evaluations, and then again (e) and (f) are related to assessments.

response	Accepted
	The title has been changed to reflect the situation.

comment	*59*		comment by: *GdF*
	"KNOWLEGDE" typo in the headline - please check in the source material		
response	Accepted		

comment	*105*	comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*
	AMC1 ATCO.B.025(a)(5);(6);(9) Unit competence scheme b), page 33 The examples given for when an applicants performance can't be observed during an assessment might be 'normal' situations at several of the swedish ATS units. Snow clearing might be continuous for long times and since we have the integrated military/civil ATS military traffic is not something out of the ordinary. The examples given should be more specific to hold for instance: snow clearing on a closed runway or military traffic during excercises, otherwise we can't see that it is an abnormal situation that doesn't allow assessment to be done.	
response	Noted	
	For the Swedish locations the situations are resolved. Should you wish to create an additional granularity to the examples provided, this is not against the AMC proposed.	

comment	*173*		comment by: *EPN*
	We think *(e) Assessments should be adapted to the validity time of the unit endorsement* - Needs to be re-written as the meaning is unclear to me, and to some colleagues that I randomly asked.		
response	Accepted		
	This GM was purposed to provide guidance when the validity period of the unit endorsement was changed and is not needed any longer.		

| comment | 186 | comment by: *CroControl* |

TEXT:

PROCESSES FOR ASSESSING COMPETENCE AND EXAMINING THEORETICAL KNOWLEGDE AND UNDERSTANDING

(a) The practical performance ~~and skills~~ should be assessed in live traffic situations against performance criteria defined and updated by the air ~~navigation~~ traffic services provider according to the requirement set out in ATCO.B.025(a)(16).

(b) For those situations where an applicant's performance cannot be observed at the time of the assessment (e.g., low-visibility operations, snow clearing, military activity, etc.), the assessment may be supplemented by synthetic training device sessions and/or an oral examination.

(~~b~~c) Theoretical knowledge and understanding ~~competence~~ should be examined. ~~to ascertain the knowledge and understanding of air traffic controllers.~~

(~~c~~d) Subjects taught during refresher training such as standard practices and procedures, abnormal and emergency situations and human factors should be ~~assessed~~ evaluated on STD or in other simulated environments and/or examined.

(e) Assessments should be adapted to the validity time of the unit endorsement.

(f) The assessment of air traffic controllers at ATC units with seasonal variations should reflect the higher volume and complexity situations.

COMMENT:
Proposal of the title: PROCESSES FOR ASSESSING COMPETENCE ~~AND~~, EXAMINING THEORETICAL KNOWLEGDE AND UNDERSTANDING AND EVALUATION OF SUCCESSFUL COMPLETION

| response | Accepted |

See the response to comment #41.

| comment | 253 | comment by: *CANSO* |

… and/or oral examination

Proposal: remove the "or"
Justification: this would mean that one could assess the practical skills through an oral exam only

| response | Accepted |

In GM1 ATCO.B.025(a)(5) Unit competence scheme the text now refers to oral interview only.

comment	404	comment by: *Naviair*

… and/or oral examination

Proposal: remove the "or"
Justification: this would mean that one could assess the practical skills through an oralex am only

response	Accepted

In GM1 ATCO.B.025(a)(5) Unit competence scheme the text now refers to oral interview only.

comment	450	comment by: *DSNA chief of ATCO training program*

DSNA suggests to remove the "OR".
We don't want "oral only" for a full qualification, there shall be at least a practical part.

response	Accepted

In GM1 ATCO.B.025(a)(5) Unit competence scheme the text now refers to oral interview only.

comment	483	comment by: *FOCA Switzerland*

Point (b) reads "the assessment may be supplemented by synthetic training device sessions **and/or** an oral examination". We suggest to remove "or". We think that if we keep "or" this would mean that one could assess the practical skills through an oral exam only.

response	Accepted

In GM1 ATCO.B.025(a)(5) Unit competence scheme the text now refers to oral interview only.

comment	484	comment by: *FOCA Switzerland*

Point (e) is not clear for us: which aspects of the assessment should be adapted?

response	Noted

See the response to comment #173.
The adaptation should be to the numbers not to the parts 1 year versus 3 years validity. So maybe a continuous assessment would provide more indication rather than a single assessment.

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An agency of the European Union

comment	*614*	comment by: *European Transport Workers Federation - ETF*

(b) not all situations mentioned can be simulated : we believe more flexibility in the observation by assessors would be more of a solution here... (see comment of definition)

response	Noted

comment	*661*	comment by: *Romanian CAA*

Text NPA
AMC1 ATCO.B.025(a)(5);(6);(9) Unit competence scheme

Proposed text
AMC1 ATCO.B.025(a)(5);(6)~~(9)~~ Unit competence scheme

Justification
This AMC1 should be related only to ATCO.B.025(a)(5);(6) since (a)(5) refers to assessing competence and (a)(6) refers to theoretical knowledge and understanding.

response	Accepted

See the response to comment #41.

comment	*662*	comment by: *Romanian CAA*

Text NPA
(~~c~~d) Subjects taught during refresher training such as standard practices and procedures, abnormal and emergency situations and human factors should be ~~assessed~~ evaluated on STD or in other simulated environments and/or examined.

1) This para (~~c~~d) has no direct link with the title of this AMC `*Processes for assessing competence and examining theoretical knowledge and understanding* `
2) Para (~~c~~d) refers to the refresher training and implicitly to the evaluation process. We propose that this para (~~c~~d) to be integrated in GM~~3~~1 ATCO.B.025(a)(5~~9~~) Unit competence scheme, point (b)(2) but without „and/or examined". The removal of „and/or examined" will eliminate the confusion regarding way of completion of any refresher training.

response	Accepted

See the response to comment #41.

AMC1 ATCO.B.025(a)(3) Unit competence scheme   p. 32

comment	*32*	comment by: *skeyes*

Proposed changes	**Feedback**

the minimum number of hours or, in the case of SRA and PAR, the minimum number of approaches, for exercising the privileges of the unit endorsement, for the purpose of ATCO.B.020(i)(1), shall be established for an ~~immediately~~ preceding period of time which shall not exceed 6 months. ~~within a defined period of time, which shall not exceed 12 months, for the purpose of ATCO.B.020(i)(1)~~. For on-the-job training instructors exercising the privileges of the OJTI endorsement, the time spent instructing shall be counted for the maximum of 50 % of the hours required for revalidation of the unit endorsement;	Skeyes proposes to go back to the **initially foreseen time period of 12 months** The proposed change will cause practical issues for the ANSP to implement and monitor within the proposed time period of 6 months The current regulation foreseeing refresher with practical execution of an SRA to be performed every year, has shown that the ATCO did maintain his competence. As this is workable and has shown the validity, it is of no added value to organise more administrative work which will not lead to more safe operations as has been proven, during past years, where the ATCOs are and stay competent..

response

Not accepted

See the response to comment #23.
If a specific privilege is in operational use, it should be possible to exercise that privilege within a 6-month period.

---

comment | *65* | comment by: *LFV*

LFV would like text added to clarify that in those cases where more than one unit endorsement is performed simultaneously from one position, for example APS and ACS, the same hour should be registered for each unit endorsement.

response | Not accepted

Dual counting is not in line with the intention of the Regulation. Applying a combined value for more than one unit endorsement in the same ATC unit is possible, based on the assessment provided by the ATSP.

---

comment | *233* | comment by: *CANSO*

CANSO would like text added to clarify that in those cases where more than one unit endorsement is performed simultaneously from one position, for example APS and ACS, the same hour should be registered for each unit endorsement.

response | Not accepted

Dual counting is not in line with the intention of the Regulation. Applying a combined value for more than one unit endorsement in the same ATC unit is possible, based on the assessment provided by the ATSP.

comment	*258*	comment by: *BCAA*

- the wording "preceding period of time" does not really make sense here. The minimum number of hours should be defined for a fix period (sliding window). Prior wording was more correct.

- "which shall not exceed 6 months": it is not clear as to why this should be reduced from 12 months to 6. Minimum numbers could become very small; it may further lead to planning issues; we as NSA never encountered specific problems related to this requirement so we recommend to maintain the 12 month period. A safety barrier is already built in with the maximum 90 days non-ops.

response

Noted

The intention is to verify the achievement of the minimum number of hours in a rolling manner every 6 months. Please also refer to the response provided for comment #23.

comment	*376*	comment by: *SNCTA member of ATCEUC*

The condition listed under ATCO.B.025(a)(3) regarding reducing the duration for achieving the minimum competence hours is considered critical for a part of ATCO population.

Traffic is not evenly distributed during a year with summer as a peak season. The difference between peak season and the rest of the year is particularly important in the South of France (Corsica, Nice, Marseille ACC). Some airports such as Chambery have also a traffic distribution linked with ski season that is very specific.

Around 15%-20% of ATCOs have specific additional expertise and are not full time in the OPS room. 2/3 of their working time is dedicated to specific task (implementation of new ATM systems and functionalities, flow management, training of new ATCOs). Their tasks are essential for preparing the future of ATM and these specific competencies coupled with ATCOs competencies are necessary.

To maintain theirs ATCOs competencies, these ATCOs prefer to work more during the peak season with higher and more complex traffic. They consider as essential to have this type of distribution of ATCO working hours during the year to better maintain theirs ATCO competencies.

Furthermore, introducing this 6 month would create higher operational difficulties for ATSPs. The end of this 6 months could be more frequently concomitants with operational deadlines such as implementation of new system, operational updates, preparation of EUROCONTROL Network Operation Plan... If the constraints are too high, the ATM industry that is already struggling in finding ATCOs with these key and specific profiles will be facing an even higher challenge.

response	Noted
	See the response to comment #23. In addition to that, we recall that unit competence schemes could take into consideration seasonal variations. The use of ATCOs for additional non-operational tasks should not impact maintaining their competence.

comment	*402*	comment by: *Naviair*
	Naviair would like text added to clarify that in those cases where more than one unit endorsement is performed simultaneously from one position, for example APS and ACS, thesame hour should be registered for each unit endorsement.	
response	Not accepted	
	Dual counting is not in line with the intention of the Regulation. Applying a combined value for more than one unit endorsement in the same ATC unit is possible, based on the assessment provided by the ATSP.	

comment	*449*	comment by: *DSNA chief of ATCO training program*
	Quote of the text "	

> … time which shall not exceed 6 months."
>
> DSNA suggestion :
>
>> Keep 12 months and introduce additional criteria for 6 months periods
>>
>> Explanation :
>> DSNA understands the aim for regularity but we need 12 months in some seasonal trafic unit. DSNA agrees to add another criteria on 6 months to demonstrate regularity (an amont in 12 months with a minimum on six months) which can be more efficient….

response	Not accepted
	See the response to comment #23.

GM1 ATCO.B.025(a)(5) Unit competence scheme   p. 33

comment	*17*	comment by: *GdF*
	Request templates for the mentioned guides and forms.	
response	Not accepted	

No generic templates can be provided due to the fact that adapted competency models are defined by the ATS units.

comment	66	comment by: *LFV*

Not necessary to define "preferred" since it depends on the unit. For small units, single operated, it is impossible to have continuous assessment.

response	Noted

This text is GM. As it is provided as guidance, it is not mandatory. It is preferred to have continuous assessment, but when it is not suitable a single dedicated one is accepted.

comment	106	comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

GM1 ATCO.B.025(a)(5) Unit competence scheme d), page 33
In our opinion there should not be one solution that is preferred. Providers of service should assess what manner suits their local demands and conditions the best.

response	Noted

See the response to comment #66.

comment	174	comment by: *EPN*

Suggested rewording.

Continuous assessment should be **conducted** ~~achieved by the assessor assessing,~~ during normal operational duties**. T**he operational performance **should be** compared to the standard performance criteria of the air traffic control service expected.

response	Accepted

comment	234	comment by: *CANSO*

GM 1 ATCO.B.025(a)5
(d) Continuous assessment should be the preferred way for revalidation of a unit endorsement

Suggestion: Not necessary to define "preferred" since it depends on the unit. For small units, single operated, it is impossible to have continuous assessment.

response	Noted

See the response to comment #66.

comment	485	comment by: *FOCA Switzerland*

Point (d): we suggest to remove the sentence "Continuous assessment should be the preferred way for revalidation of a unit endorsement", as it is not in all cases the preferred way.

response | Noted

See the response to comment #66.

GM2 ATCO.B.025(a)(5) Unit competence scheme p. 34

comment | *405* comment by: *Naviair*

GM 1 ATCO.B.025(a)5
(d) Continuous assessment should be the preferred way for revalidation of a unit endorsement

Suggestion: Not necessary to define "preferred" since it depends on the unit. For smallunits, single operated, it is impossible to have continuous assessment.

response | Noted

See the response to comment #66.

GM~~3~~1 ATCO.B.025(a)(~~5~~9) Unit competence scheme p. 35

comment | *42* comment by: *Croatian Civil Aviation Agency*

Proposal to align this GM with the text in GM1 ATCO.B.025(a)(10).

Proposed text:
(a) Evaluation should be conducted primarily on a synthetic training device or offline environments.

Explanation:
GM1 ATCO.B.025(a)(10) has the same meaning but the difference is that it does not mention "of practical performance".

response | Accepted

Alignment is ensured by the deletion of the term 'evaluation'.

comment | *259* comment by: *BCAA*

typo: SUCCES**S**FUL

response | Accepted

comment | *403* comment by: *Naviair*

response | Noted

comment	663	comment by: *Romanian CAA*

Text NPA

~~ASSESSMENTS~~ EVALUATION OF SUCCEFUL COMPLETION OF REFRESHER TRAINING SUBJECTS (a) ~~Assessments~~ Evaluation of practical performance should be conducted primarily on a synthetic training device or offline environments. (b) ~~Assessments~~ Evaluation should be conducted by appropriately qualified personnel having detailed knowledge of:
(1) the training objectives; and
(2) the subjects~~, topics and subtopics~~ being examined or evaluated ~~assessed~~.

Proposed text

EVALUATION OF SUCCEFUL COMPLETION OF REFRESHER TRAINING SUBJECTS
(a) Evaluation of practical performance should be conducted primarily on a synthetic training device or offline environments.
(b)Evaluation should be conducted by appropriately qualified personnel having detailed knowledge of:
(1) the training objectives; and
(2) the subjects such as standard practices and procedures, abnormal and emergency situations and human factors,being evaluated on STD or in other simulated environments

Justification

1) Proposed ATCO.B.025(a)(9) specifies that successful completion of the refresher training is to be evaluated.
2) According to the proposed ATCO.D.080 Refresher Training and AMC1 ATCO.D.080 Refresher Training, it is considered that subjects are to be only evaluated.
3) The proposal from the *AMC1 ATCO.B.025(a)(5); (6);(9) Unit competence scheme, letter(єd)* is reworded.

response	Noted

The text has been modified to provide better clarity.

AMC1 ATCO.B.025(a)(8) Unit competence scheme   p. 35

comment	107	comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

AMC1 ATCO.B.025(a)(10) Unit competence scheme, page 36

It is a good addition to clarify and increase the demand of assessor skills. But there is a question of how to deem the assessor to be 'qualified'. To be an assessor is to be qualified.

Or is there some additional qualifications different from each unit and assessors to be on the list of 'qualified' assessors, and for what use should the 'not' qualified assessors be kept active? Some additional guidance on how to interpret the 'qualified' would be welcome.

response	Accepted

The text has been modified.

comment	*153*	comment by: *German NSA (BAF)*

AMC1 ATCO.B.025(a)(8) Unit competence scheme

"The way it is organised is left to the ANSP and/or training organisation to allow to cover the subjects planned. As such, the duration may vary according to the items under training at one point in time. The phasing of such training is left to the ANSP and/or training organisation, hence the frequency of it may differ from one ANSP to another."

Proposal: "The way it is organised is left to the air traffic service provider and/or training organisation to allow to cover the subjects planned. As such, the duration may vary according to the items under training at one point in time. The phasing of such training is left to the air traffic service provider and/or training organisation, hence the frequency of it may differ from one unit competence scheme to another."
Rationale:
1. ANSP has been replaced by ATSP throughout the document.
2. Phasing of training can differ from one unit to another (e.g. units with seasonal variations vs. units with stable traffic volumes throughout the year) and should therefore be linked to the UCS rather than the ATSP.

response	Accepted

comment	*177*	comment by: *EPN*

ANSP is used here, but has been replaced by ATSP in other sections.

For consistency use either ANSP or ATSP.

response	Accepted
	See the response to comment #153.

comment	*364*	comment by: *TO Austro Control*

....
The way it is organised is left to the ~~ANSP~~ **ATSP** and/or training organisation to allow to cover the subjects planned.
....

response	Accepted
	See the response to comment #153.

comment	*473*	comment by: *EDA*

In the second paragraph, the text refers to ANSPs, but as was done in other parts of the document, this should be changed to ATSPs.

response	Accepted
	See the response to comment #153.

comment	*489*	comment by: *Fintraffic Air Navigation Services*
	In the opinion of Fintraffic ANS this should be GM, not an AMC. The wording implies that it in fact is in practice GM. ("…these could be split…"). If need be, an AMC could be left in place, which would only contain the last paragraph ("All such details..."). All rest should have the status of GM.	
response	Not accepted	
	This was discussed in the drafting group and the decision was that this should be AMC rather than GM level.	

comment	*616*	comment by: *European Transport Workers Federation - ETF*
	While we acknowledge that a box-ticking exercise as may be the case with existing regulation is not fully satisfactory, we consider this proposal will not improve the situation in any way on the contrary, it will be less of a priority for ATSPs with the new proposal which we fear will be harmful for safety.	
response	Noted	

comment	*617*	comment by: *European Transport Workers Federation - ETF*
	Comment refering to AMC1 ATCO.B.025(a)(10) : not listed in the CRT...	
	We consider this new requirement for conversion training to be useless unless there is a proper definition of 'new unit endorsement' : if the main parts of the new element was already contained in the unit endorsement held by the licence holder, how different is this from another conversion training ?	
	We suggest to leave flexibility and rely on national competent authority that will approve conversion training plan...	
response	Noted	
	See the response to comment #107.	

comment	*653*	comment by: *NSA Austria*
	…….	
	The way it is organised is left to the ~~ANSP~~ **ATSP** and/or training organisation to allow to cover the subjects planned.	
	……….	
response	Accepted	
	See the response to comment #153.	

GM1 ATCO.B.025(a)(6) ;(10) Unit competence scheme   p. 35

comment	*145*	comment by: *GdF*

Propose to replace he/she with "the ATCO" etc.

response	Noted

EASA follows the initiative on the use of gender-neutral language that shall be gradually implemented, meaning whenever and wherever practically possible and appropriate to implement.

Regarding the subject Regulation, a (future) recast would be the most appropriate way (and best opportunity) to address, among others, gender-specific-language issues.

comment	*615*	comment by: *European Transport Workers Federation - ETF*

We disagree with the addition of the instructor in this GM, it should be clear that this is the role of assessor not instructor refered here...

response	Not accepted

The instructor is added because the privileges had been modified and the term 'evaluations' is not used any longer.

comment	*664*	comment by: *Romanian CAA*

Text NPA
GM1   ATCO.B.025(a)(6);
(10) Unit competence scheme

Proposed text
GM1   ATCO.B.025(a)(5);
(6) Unit competence scheme

Justification
1) This AMC1 should be related only to ATCO.B.025(a)(5);(6) since:
- (a)(5) refers to assessing competence and one component of assessment may be oral and/or written examinations; and
- (a)(6) refers to theoretical knowledge and understanding which may include oral examinations.

2) ATCO.B.025(a)(10) refers only to evaluation. The definition of „evaluation" implies only training on STDI or in other simulated environments.

response	Noted

This text has been removed from this GM and inserted in GM1 ATCO.B.025(a)(5) to reflect reality.

GM1 ATCO.B.025(a)(9 10) Unit competence scheme   p. 36

comment	43	comment by: *Croatian Civil Aviation Agency*

Text proposal:
EVALUATIONS DURING CONVERSION TRAINING
(b) Evaluations should be conducted…

Explanation:
Since the word "examination" in the ATCO.B.025(a)(10) is deleted and replaced with evaluation, there should not be examinations mentioned.

Also, in ATCO.D.085 assessments and examinations are deleted and now is only evaluation.

response | Accepted

Alignment is ensured through the deletion of the term 'evaluation'.

comment	187	comment by: *CroControl*

TEXT:

(a) ~~Assessments~~ Evaluation of practical performance should be conducted primarily on a synthetic training device or offline environments.

COMMENT:
We propose to align with GM1 ATCO.B.025(a)(10). Evaluation should be conducted primarily on a synthetic training device or offline environments.
GM1 ATCO.B.025(a)(10) has the same meaning but the difference is that it does not mention "of practical performance".

response | Accepted

Alignment is ensured through the deletion of the term 'evaluation'.

comment	665	comment by: *Romanian CAA*

Text NPA
EXAMINATIONS AND ~~ASSESSMENTS~~ EVALUATIONS DURING CONVERSION TRAINING
(a) ~~Assessments~~ Evaluations should be conducted primarily on a synthetic training device or offline environments. (b) Examinations and evaluations ~~assessments~~ should be conducted by appropriately qualified personnel having detailed knowledge of:
(1) the training objectives; and
(2) the subjects, ~~topics and subtopics~~ being examined or ~~assessed~~ evaluated.

Proposed text

~~EXAMINATIONS AND~~ EVALUATIONS DURING CONVERSION TRAINING
(a) Evaluations should be conducted primarily on a synthetic training device or offline environments.
(b) ~~Examinations and e~~Evaluations should be conducted by appropriately qualified personnel having detailed knowledge of:
(1) the training objectives; and
(2) the subjects, being ~~examined or~~ assessed evaluated.

Justification

1) ATCO B.025 and ATCO.D.085 refers only to evaluation during conversion training.
2) The definition of „evaluation" implies only training on STDI or in other simulated environments.
3) If it is considered the need for examinations of some subjects (theoretical knowledge), EASA should revise ATCO B.025 and ATCO.D.085 to introduce the notion of examination, besides evaluation, for the completion of conversion training.

response	Accepted
	Alignment is ensured through the deletion of the term 'evaluation'. In addition, the practical instructor privileges are modified to allow the instructor to carry out the assessments during conversion training.

AMC1 ATCO.B.025(b) Unit competence scheme   p. 36

comment	*327* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Clarification of the implementation of this AMC is needed.

- Would this AMC lead to a modification of existing sector groups?
- How would today's occurrences correspond to the working hours envisaged by the AMC?
- the number of hours should be distributed to cover those in a fair manner" p37: How should be interpreted? |
| response | Noted

Today, many examples show that the counting of hours is only done per rating and not as well per unit endorsement(s) associated with the rating(s). As such, this was meant to provide better clarification.
Additionally, the number of total hours on duty by ATCO could be higher that the effective hours on operational duty, which can be different from those required as a minimum number of hours to maintain competence. |

comment	*377* comment by: *SNCTA member of ATCEUC*
	ATM industry seems to consider future of ATM licensing will be system based and no longer geographical. To the contrary, this proposal added to the sentence "the number of hours should be distributed to cover those in a fair manner" of p37 seems to reinforce the geographical aspect of licensing.

We believe that the actual regulation and with a number of occurrences recorded considering sectors, group of sectors and/or working positions in the ATC unit is a more flexible approach toward system licensing.

During a shift, ATCOs tend to work on the same sector or working position for a certain amount of time. Moving from one sector to another, splitting or combining airspace sectors is something usual but some stability in the OPS configuration is essential to maintain a good level of safety. Considering this element, the approach proposed by this AMC based on working hours does not bring additional inputs on data safety and will not result in better oversight.

We would propose to delete the proposal of AMC1 ATCO.B.025(b).

response	Noted
	See the response to comment #327.

comment	*486*	comment by: *FOCA Switzerland*

We suggest to delete the last sentence. Indeed the roster will reflect the planned hours: the hours provided to the CA are the effective hours and these may well differ due to early goes or late goes.
Additionally, the roster includes breaks and the effective hours reflect the actual operational working time. Therefore, they cannot be the same. The hours provided to the CA are the effective hours not the planned ones.

response	Not accepted
	The last sentence provides for the same numbers to be recorded and transmitted to the CA by the ANSP. The CA interest is in effective hours not in duty hours.

comment	*618*	comment by: *European Transport Workers Federation - ETF*

This is not needed (nor is any justification provided in the NPA : which input from standardisation visit ? How is the current setup problematic ? When was this presented/discussed with stakeholders ?)

response	Noted
	See the response to comment #327.

AMC4 ATCO.B.040 Assessment of language proficiency   p. 37

comment	*44*	comment by: *Croatian Civil Aviation Agency*

In the whole AMC is still Language Assessment Body mentioned, despite the name is replaced by Language testing organisation.

response	Accepted

comment	*154*	comment by: *German NSA (BAF)*

AMC4 ATCO.B.040 Assessment of language proficiency

Proposal: Replace "language assessment body" with "language testing organisation" in line with the regulatory requirement.

response	Accepted

comment	*264*	comment by: *BCAA*

Proposed change to "language testing organisations" is not consistently used

response	Accepted

ATCO.B.040 Assessment of language proficiency   p. 37

comment	*188*	comment by: *CroControl*

In the whole AMC is still Language Assessment Body mentioned, despite the name is replaced by Language testing organisation.

response	Accepted

Modifications have been made to align the text.

comment	*238*	comment by: *CANSO*

ATCO.B.040 Assessment of language proficiency
[…]
(b) Language testing organisations assessment bodies shall comply with the requirements established by the competent authorities according to ATCO.AR.A.010.

AMC4 ATCO.B.040 Assessment of language proficiency
CRITERIA FOR THE ACCEPTABILITY OF LANGUAGE ASSESSMENT BODIES
A language assessment body should provide clear information about its organisation and its relationships with other organisations.
ATCO.AR.A.010 Tasks of the competent authorities
the approval of the assessment method for the demonstration of language proficiency and the establishment of requirements applicable to language assessment bodies according to point ATCO.B.040
2.5. Alignment with the inputs resulting from the committee procedure for Opinion No 06/2022
A number of inputs resulting from the committee procedure for Opinion No 06/2022 have been taken into account in this NPA. Said inputs are described below:
— 'Language assessment bodies' has been changed to 'language testing organisations' to align with the terminology used by ICAO and in the FCL Regulation.

Note: What is the underlying reason of present change? If *'language testing organisation'* is accepted, the same wording in the main paragraph and its AMC and also in ATCO.AR.A.010.would be better.

Moreover, the ICAO Doc 9835 about language testing uses the term 'testing services' and *'testing service providers'*, not *'language testing organisations'*. Furthermore, AMC1 FCL.055 (h) uses 'language assessment bodies'.

response	Noted
	The wording is aligned with ICAO Annex 1.

comment	*406*	comment by: *Naviair*

ATCO.B.040 Assessment of language proficiency
[…]
(b) Language testing organisations ~~assessment bodies~~ shall comply with the requirementsestablished by the competent authorities according to ATCO.AR.A.010.

AMC4 ATCO.B.040 Assessment of language proficiency
CRITERIA FOR THE ACCEPTABILITY OF LANGUAGE ASSESSMENT BODIES
A language assessment body should provide clear information about its organisation and its relationships with other organisations.
ATCO.AR.A.010Tasks of the competent authorities
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Note: What is the underlying reason of present change? If *'language testing organisation'* is accepted, the same wording in the main paragraph and its AMC and alsoin ATCO.AR.A.010.would be better.
Moreover, the ICAO Doc 9835 about language testing uses the term 'testing services' and *'testing service providers'*, not *'language testing organisations'*. Furthermore, AMC1 FCL.055 (h) uses 'language assessment bodies'.

response	Noted
	The wording is aligned with ICAO Annex 1.

| **AMC1 ATCO.C.001(b)(2) Theoretical instructors** | p. 39 |

| comment | *4* | comment by: *DFS Deutsche Flugsicherung GmbH* |

Translated into German language the "and" alone would be more restrictive than "and/or", which is not desirable and does not allow the intended choice, which is essential to keep.
We do not support this substitution.
This comment is valid for all these changes throughout the NPA.

| response | Accepted |

| comment | *146* | comment by: *GdF* |

"Issue encountered with the translation. In some languages, 'and/or' translates to only 'or'. Proposal to delete to ensure more clarity."

Given that this document follows AMC guidelines, the English language is considered authoritative. Moreover, the use of 'and/or' throughout the document, albeit without any apparent issues, renders the reasoning somewhat peculiar.

Replacing 'and/or' with 'and' would actually alter the original meaning. If the goal is to eliminate ambiguity entirely, it is advisable to use 'or' instead.

Request to change to "subject being taught or has demonstrated".

| response | Accepted |

| comment | *155* | comment by: *German NSA (BAF)* |

ATCO.C.001 Theoretical instructors (b) (2)

"has demonstrated instructional skills to the training organisation."
Proposal: "has satisfactorily demonstrated instructional skills to the training organisation."
Rationale: Closer link to the related AMC which rather describes the observable behaviours to satisfy the required competency standard than the means or procedures of demonstration.

| response | Accepted |

| comment | *178* | comment by: *EPN* |

Suggestion to rephrase : *appropriate use of teaching aids **and learning platforms** including where applicable, management of technical platforms for remote learning (hardware, software);*

	We would add the text in bold above, as theoretical instructors should also be proficient in classroom learning platforms.
response	Not accepted Teaching aids are mentioned in point (c). Point (d) mentions the technical platform. According to this AMC, instructors should also be proficient in classroom learning platforms.

comment	*254*	comment by: *CANSO*
	AMC1 ATCO.C.001(b)(2)(d) 38 "participants are engaged… etc" Proposal: remove the text justification: this article is on the instructor skills and not on the student activities so it does not make sense to have this here. It is not clear who is meant by the "participants".	
response	Not accepted While it is true that the AMC primarily focuses on instructor skills and not student activities, the phrase 'participants are engaged' may still be relevant. The term 'participants' could encompass both instructors and students, as they are both actively involved in the learning process. Removing this text might lead to ambiguity and a lack of clarity regarding the intended audience and the context in which the instructor skills are applied.	

comment	*282*	comment by: *EUROCONTROL*
	AMC1 ATCO.C.001(b)(2) Theoretical instructors (d) participants are engaged in the learning process and facilitating skills are… Skills used in facilitation are called facilitation skills, not facilitating skills. Replace 'facilitating' by 'facilitation'.	
response	Accepted	

comment	*408*	comment by: *Naviair*
	AMC1 ATCO.C.001(b)(2)(d) 38 "participants are engaged… etc" Proposal: remove the text justification: this article is on the instructor skills and not on the student activities so it does not make sense to have this here. It is not clear who is meant by the "participants".	
response	Not accepted While it is true that the AMC primarily focuses on instructor skills and not student activities, the phrase 'participants are engaged' may still be relevant. The term 'participants' could encompass both instructors and students, as they are both actively involved in the learning process. Removing this text might lead to ambiguity	

and a lack of clarity regarding the intended audience and the context in which the instructor skills are applied.

comment	*488*	comment by: *FOCA Switzerland*

We suggest to delete (d) as this point refers to the instructor skills and not to the student activities : it does not make sense to have this here. Furthermore, it is not clear who are the "participants"

response	Not accepted

While it is true that the AMC primarily focuses on instructor skills and not student activities, the phrase 'participants are engaged' may still be relevant. The term 'participants' could encompass both instructors and students, as they are both actively involved in the learning process. Removing this text might lead to ambiguity and a lack of clarity regarding the intended audience and the context in which the instructor skills are applied.

ATCO.C.001 Theoretical instructors   p. 39

comment	*45*	comment by: *Croatian Civil Aviation Agency*

The proposal is not to delete "holds an air traffic controller licence".

Deleting the ATCO licence as appropriate qualification related to point (b)(1) leaves the ATCO TOs with no experts inside its organisation and with lot of question marks e.g.:
Who is qualified to be theoretical instructor for Aviation Law, for instance? Someone who finished (aviation) law?
What about other subjects e.g. Aerodrome, do we need an aerodrome expert?
Do the TOs then need to employ the external experts for each subject area?

According to EASA`s rationale:
"Holding an ATCO licence does not automatically imply an appropriate knowledge with the taught subject. Proposal to delete."

It is correct, but that`s why there is a point (b)(2) where that person demonstrates instructional skills to the training organisation according to AMC1 ATCO.C.001(b)(2) which contains for instance competence in defining and communication of lesson objectives, answering subject questions, fulfilling the lesson objectives, etc. what can confirm the knowledge of that person.

If the ATCO TOs consider that ATCO concerned is enough qualified to teach candidates in needed knowledge of aviation law related to their job, and also demonstrates instructional skills would it be enough to comply with this requirement? Or should the ATCO TO`s invent the additional examinations/evaluation to check the knowledge and experience of nominated theoretical instructor?

It should be considered not to increase administartion but to reduce it.

We also propose not to delete "/or" in the text, because it leaves the TOs to have for instance qualified person for example for Meteorology within the same company and there is no need to additionally demonstrate adequate knowledge and experience to the TO, only to demonstrate instructional skills.

response	Partially accepted
	Holding an ATCO licence does not automatically imply an appropriate level of knowledge of the subjects taught. On the other hand, nothing prevents a training organisation from assigning an ATCO with proper knowledge (e.g. aviation law) as theoretical instructor.
	The second proposal is accepted.

comment	*55*	comment by: *GdF*
	Agree.	
	regarding "he or she" - please deliberate if EASA shouldn't use more gender-neutral language, like "the instructor" or "the person"	
response	Noted	

comment	*79*	comment by: *EPN*
	consideration should be given to using the term 'the person', or simply 'they' instead of 'he or she'.	
response	Noted	

comment	*189*	comment by: *CroControl*
	TEXT:	

> (b) A theoretical instructor is appropriately qualified if ~~he/she~~ he or she:
> (1) ~~holds an air traffic controller licence and/or~~ holds a professional qualification appropriate to the subject being taught and~~/or~~ has demonstrated adequate knowledge and experience to the training organisation;

COMMENT:
We propose not to delete "holds an air traffic controller licence".

Deleting the ATCO licence as appropriate qualification related to point (b)(1) leaves the ATCO TOs with no experts inside its organisation and with lot of question marks e.g.:
Who is qualified to be theoretical instructor for Aircraft, for instance? A pilot, mechanic, someone who finished spcific faculty?
What about other subjects e.g. Aerodrome, do we need an aerodrome expert?

Do the TOs then need to employ the external experts for each subject area?

According to EASA`s rationale "Holding an ATCO licence does not automatically imply an appropriate knowledge with the taught subject. Proposal to delete."
It is correct, but that`s way there is a point (b)(2) where that person demonstrates instructional skills to the training organisation according to AMC1 ATCO.C.001(b)(2) which contains for instance competence in defining and communication of lesson objectives, answering subject questions, fulfilling the lesson objectives, etc. what can confirm the knowledge of that person.

If the ATCO TOs consider that ATCO concerned is enough qualified to teach candidates in needed knowledge of aviation law related to their job, and also demonstrates instructional skills would it be enough to comply with this requirement? Or should the ATCO TO`s invent the additional examinations/evaluation to check the knowledge and experience of nominated theoretical instructor?

We think that the wasting the time of personnel involved in ATCO TO activities should be reduced including the time spent in administration.

We also propose not to delete "/or" in the text, because it leaves the TOs to have for instance qualified person for example for Meteorology within the same company and there is no need to additionally demonstrate adequate knowledge and experience to the TO, only to demonstrate instructional skills.

response	
	Partially accepted

Holding an ATCO licence does not automatically imply an appropriate level of knowledge of the subjects taught. On the other hand, nothing prevents a training organisation from assigning an ATCO with proper knowledge (e.g. aviation law) as theoretical instructor.

The second proposal is accepted.

comment	*218*	comment by: *CANSO*

ATCO.C.001 Theoretical instructors
(1) ~~holds an air traffic controller licence and/or~~ holds a professional qualification appropriate to the subject being taught <mark>and</mark>~~/or~~ has demonstrated adequate knowledge and experience to the training organisation;

Question regarding: "subject being taught and~~/or~~ has demonstrated adequate knowledge and experience" ->
"Rationale — ATCO.C.001 and AMC ATCO.C.001

Issue encountered with the translation. In some languages 'and/or' translates to only 'or'. Proposal to delete to ensure more clarity."

Translated into some languages the "and" alone would be more restrictive than "and/or", which is not desirable and does not allow the intended choice, which is essential to keep.

We do not support this substitution.

This comment is valid for all these changes throughout the NPA.

Can you better clarify the reason and the impact of removing "or"? This deletion has also been implemented in other parts of the regulation with the intent to provide more clarity; <mark>however, this withdraws the so far established flexibility.</mark> (e.g. ATCOs with the appropriate knowledge but who do not hold a professional qualification would not be allowed to teach the subject).

response	Accepted

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comment	*333* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Clarification of EASA's objective in making this modification would be appreciated.
response	Accepted
	Please refer to the response to comment #45.

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comment	*407* comment by: *Naviair*
	ATCO.C.001 Theoretical instructors (1) ~~holds an air traffic controller licence and/or~~ holds a professional qualification appropriate to the subject being taught and~~/or~~ has demonstrated adequate knowledge and experience to the training organisation; Question regarding: "subject being taught and~~/or~~ has demonstrated adequate knowledge andexperience" -> *"Rationale — ATCO.C.001 and AMC ATCO.C.001* *Issue encountered with the translation. In some languages 'and/or' translates to only 'or'. Proposal todelete to ensure more clarity."* *Translated into some languages the "and" alone would be more restrictive than "and/or",which is not desirable and does not allow the intended choice, which is essential to keep.We do not support this substitution.* *This comment is valid for all these changes throughout the NPA.* Can you better clarify the reason and the impact of removing "or"? This deletion has also been implemented in other parts of the regulation with the intent to provide more clarity; however, this withdraws the so far established flexibility. (e.g. ATCOs with the appropriate knowledge but who do nothold a professional qualification would not be allowed to teach the subject).
response	Accepted

Please refer to the response to comment #45.

comment	*462* comment by: *IAA*

(b) (1) holds a professional qualification appropriate to the subject being taught and/~~or~~ has demonstrated adequate knowledge and experience to the training organisation;

Sub comment 1.

'holds a professional qualification appropriate to the subject being taught'

Suggest GM to clarify the term 'professional qualification' . Without an AMC or GM, there may be a lack of consistent application of this requirement.

Sub comment 2.

Suggested editorial to add the word 'subject' as highlighted below:

`*…demonstrated adequate* ==subject== *knowledge and experience to the training organisation*`

Comment 3.

What are the acceptable methods for demonstrating `*adequate knowledge* and *experience*'?

Recommendation for AMC and/or GM

response | Not accepted

For subcomment 1:

GM1 ATCO.C.001(b)(1) 'Theoretical instructors' provides relevant guidance on professional qualification. The introduction of new GM is not considered necessary. Training organisations should be mature enough to evaluate the suitability of the professional qualification. As there are plenty of individual cases/qualifications, producing a list as guidance would not cater for all possible scenarios and could, therefore, be counteractive.

For subcomment 2:

Adding the word 'subject' would not bring any added value as knowledge covers also subject knowledge.

For subcomment 3:

Training organisations should be mature enough to evaluate the suitability of the professional qualification. As there are plenty of individual cases/qualifications, producing a list as guidance would not cater for all possible scenarios and could, therefore, be counteractive.

---

comment	*619*	comment by: *European Transport Workers Federation - ETF*

We are opposed to removing 'holds an air traffic controller licence and/or'. Why is this proposed ? What is the issue ?

response	Not accepted

See the response to comment #45.

GM1 ATCO.C.010(b)(2) On-the-job training instructor (OJTI) privileges p. 40

comment	*18*	comment by: *GdF*

So, the 6 months are extended on the calendar? Or the 6 months start anew after the inability? Req clarification in the text, please.

response	Accepted

The GM text is deleted.

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comment	*87*	comment by: *EPN*

There should be alignment of the terminology - instructional techniques vs instructional skills. Now both terms are used in different places.

response	Accepted

The text is aligned.

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comment	*196*	comment by: *Estonian Transport Administration*

The reference to ATCO.B.025(a)(14)* doesn't seem correct. Further clarification needed if it was intentional.

* identification of records to be kept specific to continuation training and assessments, in accordance with ATCO.AR.B.015;

response	Accepted

The GM text is deleted.

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comment	*334*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Request for clarification of practical implementation GM1 ATCO.C.010(b)(2). In particular, there is a need to clarify the *"should exclude"* (which creates confusion with the "could include" in the same sentence). The "should exclude" would increase

a calendar period of 6 months by considering a wider period encompassing the periods of interruption of the ATCO.A.015 and ATCO.B.025(a) (2), (3) and (14) ?

response	Accepted
	The GM text is deleted.

comment	*379*	comment by: *SNCTA member of ATCEUC*
	"The 6-month period for exercising the privileges of the valid unit endorsement could include any holiday or days off the ATCO is entitled to, but should exclude situations included in ATCO.A.015 and ATCO.B.025(a) (2), (3) and (14)"	
	This GM1 ATCO.C.010(b)(2) needs clarification. The meaning of "included" is understood but the wording "should exclude" could lead to different understanding. The following wording appears to us as more appropriate.	
	"The 6-month period for exercising the privileges of the valid unit endorsement could include any holiday or days off the ATCO is entitled to. Considering situations included in ATCO.A.015 and ATCO.B.025(a) (2), (3) and (14), the preceding 6-month period for exercising the privileges of the valid unit endorsement should be expanded by adding the duration of these particular situations."	

response	Accepted
	The GM text is deleted.

comment	*620*	comment by: *European Transport Workers Federation - ETF*
	Discriminatory for ATCOs prevented from continuous exercise of privileges (eg by pregnancy), we are opposed to the introduction of such 6-month period.	

response	Accepted
	The GM text is deleted.

ATCO.C.010 On-the-job training instructor (OJTI) privileges   p. 40

comment	*80*	comment by: *EPN*
	typo, in (b) (2) the 'an' becomes an 'a' with the deletion of the word immediately	

response	Accepted

comment	*98*	comment by: *ENAIRE*
	ATCO.C.010 (b) (3): The word "techniques" should replace "skills", as done in all section C.	

response	Accepted

For alignment reasons, the term "competencies" is used.

comment	*260*	comment by: *BCAA*

(b)(2) "exercised for a preceding period of at least six months": by removing "immediately" here, it may be interpreted that it is ok if the 6 months exercising unit endorsement happened 2 years ago.
Better to write: "exercised for **the** preceding period of at least six months" or keep the "immediately"

response	Accepted

comment	*283*	comment by: *EUROCONTROL*

(2) exercised for an ~~immediately~~ preceding period…
Typo - Replace 'an' by 'a'.

response	Accepted

comment	*451*	comment by: *AESA*

In the inspection carried out by EASA in 2017, we had a finding related to the necessary experience for the instructors who teach in assessor courses. It stated that they should have assessor experience. We expected that this point would be included in the next changes to the legislation, but it has not been. We have requested the compliance with this point to our organisations but we all think that this should be explicitly included in the regulation. There are different requirements of experience for the assessors in ATCO.C.045 but there are no similar requirements for instructors. Also related to that, we think that if instructors who teach in assessor courses should have assessor experience, also instructors who teach in instructor courses should have instructor experience.

response	Noted

Please refer to AMC1 ATCO.OR.C.001(d). The relevant needed competence of the instructors conducting assessor training has to be established and demonstrated by the training organisation. No need for regulatory change is identified in this context.

comment	*470*	comment by: *EDA*

By skipping the word "*immediately*" it may be understood that the "preceding period" referred to could have happened far away in the past, which cannot/should not be the intention. To leave out ambiguity it is therefore suggested:
to restore the word "immediately",
or to write "the preceding period".

response	Accepted

ATCO.C.015 Application for on-the-job training instructor endorsement　　　　p. 40

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comment	101	comment by: *ENAIRE*

ATCO.C.015 (b):
We would appreciate the inclusion of a GM o a clarification that states if the period of exercise of the ATC license must or must not be immediately prior the application. We understand that it does not have to be, but we would prefer it not to be open to any possible future misinterpretation by any Authority. Also, are long periods of time or provisional disability situations exclu<u>de</u>d?

response	Not accepted

The text is clarified to refer to 'for a period of at least the 2 years preceding the application'.

comment	261	comment by: *BCAA*

ATCO.C.015(b) "have exercised the privileges of an air traffic controller licence for a period of at least 2 years ~~immediately~~ preceding the application. This period can be shortened to not less than 1 year by the competent authority when requested by the training organisation; and"
Ambiguous, better "for a period of at least <u>the</u> 2 years preceding"

response	Accepted

comment	621	comment by: *European Transport Workers Federation - ETF*

Pedagogical skills should be taught : change (c).

response	Partially accepted

Pedagogical skills have been removed to make a link with the CBTA framework by referring to the instructional competencies course instead.

ATCO.C.020 Validity of on-the-job training instructor endorsement   p. 40

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comment	309	comment by: *EUROCONTROL*

Editorial
Numbering unclear. What does (ci) and (cii) related to?
Provision includes two unnecessary references to 'point'
Delete the word 'point'

response	Accepted

The numbering was deleted.

comment	409	comment by: *Naviair*

We suggest the following amendment:
~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement

Justification:

The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenendfrom revalidation period to revalidation period.

For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore thefirst sentence should be deleted.

In order to reduce the period in which refresher trainings shall be performed between twovalidity dates, we also suggest to delete "first" in the second sentence. Alternatively, this AMC could be deleted since exceeding three years has no impact on safety nor quality of OJT. Some ANSPs aim to have the same expiry date for the OJTI endorsement, allowing for a beneficial practical way of working. This proposition does not allow to apply this way of working any longer.

At the end revalidation is only an administrative issue which should be a process going as smoothly as possible when all requirements are fulfilled and the ATCO is declared to continue to be competent in the endorsement.

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

AMC1 ATCO.C.020(b) Validity of the on-the-job training instructor endorsement　　　p. 41

comment	*33*	comment by: *skeyes*

The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement.	Request to delete this AMC since exceeding three years has no impact on safety nor quality of OJT. Furthermore, the second phrase can be interpreted in several ways.
	At skeyes, we aim to have the same expiry date for the OJTI endorsement, allowing for a beneficial practical way of working. This proposition does not allow us to apply this way of working any longer.
	At the end revalidation is only an administrative issue which should be a process going as smoothly as possible when all requirements are fulfilled and the ATCO is declared to continue to be competent in the endorsement.

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*67*	comment by: *LFV*
	The period…. should not exceed 3 years. This will cost a lot of administration to keep track of. A better writing would be that the refresher training should *always* be undertaken during the last two years of the validity of the endorsement.	

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*208*	comment by: *DFS Deutsche Flugsicherung GmbH*
	We suggest the following amendment: ~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement Justification: The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenend from revalidation period to revalidation period. For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore the first sentence should be deleted. In order to reduce the period in which refresher trainings shall be performed between two validity dates, we also suggest to delete "first" in the second sentence.	

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

| comment | 221 | comment by: *CANSO* |

We suggest the following amendment:

~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement

Justification:
The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenend from revalidation period to revalidation period.
For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore the first sentence should be deleted.
In order to reduce the period in which refresher trainings shall be performed between two validity dates, we also suggest to delete "first" in the second sentence.

Alternatively, this AMC could be deleted since exceeding three years has no impact on safety nor quality of OJT. Some ANSPs aim to have the same expiry date for the OJTI endorsement, allowing for a beneficial practical way of working. This proposition does not allow to apply this way of working any longer.
At the end revalidation is only an administrative issue which should be a process going as smoothly as possible when all requirements are fulfilled and the ATCO is declared to continue to be competent in the endorsement.

| response | Not accepted |

It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

| comment | 262 | comment by: *BCAA* |

P41 – AMC1 ATCO.C.020(b) "The period between two succeeding refresher courses on practical instructional techniques ==should not exceed 3 years==. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement."
P43 – AMC1 ATCO.C.040(b) "The period between two succeeding refresher courses on practical instructional techniques ==should not exceed 3 years==. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement."
--> Planning issues may occur, as such refresher courses are typically done in calmer periods, or in the same month. The AMC does not allow for flexibility if e.g. the training is done one year at the beginning of March and 3 years later planned by the end of March. Easier would be to allow the refresher course always to be undertaken in the last 1 (or 2) years of the validity.

| response | Not accepted |

It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*285*	comment by: *EUROCONTROL*

(2) successfully passing a practical instructor competence assessment.
Incorrect use of the present participle of 'pass'. In this context, the past participle should be used, as it was correctly done in (1).
Replace 'passing' by 'passed'.

response	Accepted

The wording is changed.

comment	*356*	comment by: *TO Austro Control*

The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validdty is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the OJTI has successfully passed the refresher training, which of course should not be done too early within that period.
For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex.
We therefore suggest to delete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the
last 2 years (alternatively during the last year) of the validity of the endorsement.

response	Not accepted

It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*378*	comment by: *SNCTA member of ATCEUC*

The proposed AMC could create operational difficulties. This proposal leads to anticipating the
planning of the associated refresher courses before this 3-year period.

Taking the example of a refresher course which took place 1st of October 2022, considering this
phenomenon of anticipation and calendar constraints, the next one will be probably planned

between the 15th of September and the 1st of October 2025. In 2028 same anticipation and ATSPs will
have to choose between planning training during peak traffic season or having some ATCOs not able
to renew their OJTI mention.

We would propose a more flexible approach, if training was planned in 2022, the next training should
be planned before 31st of December 2025. Furthermore, with our proposal, anticipation of refresher
courses would still be necessary for ATCO who had refresher courses at the end of the calendar year
but without an accumulating effect of this anticipation over the years.

The wording proposed is the following:
"The period between two succeeding refresher courses on practical instructional techniques should
not exceed the 3 following calendar years. *For the first revalidation, the refresher training should be*
undertaken during the last 2 years of the validity of the endorsement."

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*383*	comment by: *FABEC TTF*

Standardisation of the processes of the auditee organisation is key in order to make oversight activities easier and more efficient. From an oversight perspective, it is indeed much easier to control and monitor standardised activities instead of different activities in terms of size and complexity. European legislation gives the provider a strict and clear description of what and when something has to be done and implemented, but, at the same time, providers have the freedom to develop their management system to suit their commitments and desires. ATCO Licencing requirements can be considered as one of the main contributors to aviation risk reduction, so they should not be changed without a direct link to aviation safety. The requirement that forces ANSPs to organise a refresher training for OJTIs/STDIs every 3 years does not have any link to aviation safety. However, this has a direct influence on the ANSP's internal organisation, where the organisation depends on internal objectives (what is planned for the next period: 1-5 years). Having a large number of OJTIs/STDIs, some of them regularly provide training to trainees, some are used as a backup or, in agreement with the management of the organisation, they perform their OJTI/STDI activities as a part-time job. We have never encountered a situation where OJTIs/STDIs are not able to perform their duties as described in the internal procedures. In addition, during the delivery of the OJT phase, we didn't notice that OJTIs had any, even small, deviations from actual processes that could have an influence on safety. The selection process of OJTIs should suit organisational commitments, taking into consideration the requirements

of the Commission Regulation (EU) 2017/373, which shall be bonded to the highest safety standards. We don't see how this requirement improves the safety or even administrative activities of the ANSP; on the other hand, it rather creates unnecessary administrative burden in a system which is already very complex and demanding daily maintenance and monitoring. We strongly advise removing the requirement for the 3 years period between two succeeding refresher courses on practical instructional techniques for the OJTI and STDI endorsement and finding another useful way to streamline oversight activities.

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*452* comment by: *DSNA chief of ATCO training program*
	Quote of the text :
	"The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement."
	DSNA suggest to remove the text. There is no period between two Refresher courses on a unit endorsement, therefore DSNA doesn't measure the importance of having a priod between two succeeding refresher course on the OJTI endorsement.

response	Not accepted
	It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*490* comment by: *Fintraffic Air Navigation Services*
	This is a needless paragraph and does not clarify the process. The existing statement on when refresher training should be received is very clear. This new paragraph in practice leads to a situation where refresher training will always come earlier during a single validity period, because ATCOs will have to be put to a refresher training course well before the three year period is expiring to cover for any eventualities that might happen, thus forcing the next deadline of a refresher course to come earlier.

response	**Not accepted** It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*491* comment by: *Fintraffic Air Navigation Services* What needs clarification, is to have a statement when the application for the revalidation can be done. In a case when refresher training is done one year after the first endorsement, it should be possible to apply for the revalidation right after the succesful completion of the refresher training, and the revalidated, new expiry date of the endorsement should go forward 3 years from the original expiry date. Now this process is not clear and requires clarification.
response	**Not accepted** It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	*585* comment by: *CAA Norway* • We do not see the intension behind: "For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement". *AMC1 ATCO.C.020(b) Validity of the on-the-job training instructor endorsement* *The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement.*
response	**Not accepted** It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.

comment	622	comment by: *European Transport Workers Federation - ETF*
	Why ? This is introducing a new layer of administrative burden on top of validity dates of multiple elements, the date of refresher courses will not need to be tracked before the next one. Why ? Where is the evidence that the current provision is problematic ? This would lead to more interruption of validity of endorsements, more use of provisional inability and less controllers available to actually servicing air traffic... Not understandable.	
response	Not accepted It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.	

comment	647	comment by: *NSA Austria*
	The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validty is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the OJTI has successfully passed the refresher training, which of course should not be done too early within that period. For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex. **We therefore suggest to delete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the** **last 2 years (alternatively during the last year) of the validity of the endorsement.**	
response	Not accepted It was observed either during standardisation inspections or via enquiries that the interval between two courses exceeds 3 years. Therefore, the text tries to clarify that the mechanism described does not provide for more than 3 years between two refresher courses.	

GM1 ATCO.C.020(b) Validity of on-the-job training instructor endorsement   p. 41

comment	623	comment by: *European Transport Workers Federation - ETF*
	Creates more assessment in a context where there is already too much... Not ok.	
response	Accepted The GM has been removed from the amendment.	

ATCO.C.025 Temporary OJTI authorisation	p. 41

comment	*624*	comment by: *European Transport Workers Federation - ETF*

When compliance with the requirements provided for in ATCO.C.010(b)(1) should also be included here.

response	Not accepted

The conditions for temporary OJTI authorisation have been the same since 2015.

comment	*666*	comment by: *Romanian CAA*

Text NPA
When compliance with the requirements provided for in ATCO.C.010(b)(2) is not possible, the competent authority may grant temporary OJTI authorisation based on a safety analysis presented by the air navigation traffic services provider.

Proposed text
When compliance with the requirements provided for in ATCO.C.010(b)(2) is not possible, the competent authority may grant temporary OJTI authorisation *based on a safety analysis presented by the air navigation traffic services provide* in accordance with ATCO.B.020(c).

response	Partially accepted

The text proposed to remove the safety analysis from the justification for the request of temporary authorisation is not accepted. It has been there since 2015.
However, the link with ATCO.B.020(c) is supported.

AMC1 ATCO.C.030(b)(2) Synthetic training device instructor (STDI) privileges	p. 42

comment	*19*	comment by: *GdF*

"For STDIs not holding a valid unit endorsement, the demonstration of knowledge of current operational practices should be achieved by other means."

As one of the stated goals of the NPA is to achieve harmonization in application across member states, implementing a vague and ambiguous rule like this would be inadequate. It would result in inconsistent application, even within a single member state.

Please consider adding the means, e.g.: ", which should be equivalent to or the same as the unit competency scheme."

response	Noted

The text provides the indication that the process to have refresher training is included in the unit competence scheme; so, there is the clear link with it.

GM1 ATCO.C.025(a) Temporary OJTI authorisation	p. 42

comment	*102*	comment by: *ENAIRE*

Rationale — GM1 ATCO.C.010(b)(2), ATCO.C.015, ATCO.C.020, AMC and GM to ATCO.C.020 and GM1 ATCO.C.025(a):
We find that a definition of "*longer periods of time*" should be stated, or it should be specified if it is enough with what is described in the Training Plans.

response	Not accepted

The indicated references do not contain either requirements or AMC/GM that include 'longer periods of time'.
The text was modified and adapted to respond to a better planning of the periods between two courses for practical instructors.

comment	*667*	comment by: *Romanian CAA*

Text NPA
EXCEPTIONAL   SITUATIONS
Exceptional situations for which it may be considered not to be possible to comply with ATCO.C.010(b)(2) for the purpose of the valid unit endorsement experience, and, therefore, a temporary OJTI authorisation may be granted, are the following: (a) establishment of a new ATC unit or new sector for the air navigation traffic services provider;
(b) the continuity of the existing service is endangered due to the non-availability of personnel as a consequence of a change in the air navigation traffic services provider at   the   ATC   unit;
(c) new rating or rating endorsement put into operation at an ATC unit; (d) re-opening of a temporary ATC unit

Proposed text
The safety analysis presented by the air traffic service provider to the competent authority must describe in details the actions and means by which the air traffic service provider ensure the equivalent level of safety with normal operational situation and how the competence of temporary OJTIs is ensured at least to fulfil requirements as per ATCO.D.060.

Justification
1) There is a lack of guidance to the possible content and the significance of the safety analysis.
2) We propose this text to be added.

response	Not accepted

The text to address the safety analysis is provided by AMC1 ATCO.C.025(a) where there is a description of what the content of the safety analysis could be.

ATCO.C.040 Validity of synthetic training device instructor endorsement	p. 43

comment	*20*	comment by: *GdF*

"In addition, for STDIs not holding a valid unit endorsement, knowledge on the current operational practices shall be ensured."

While we definitely agree that the addition itself is rather useful, we request to add an AMC clarifying how this should be accomplished.

response	Accepted

The text was modified and aligned between STDIs and assessors.

comment	*156*	comment by: *German NSA (BAF)*

ATCO.C.040 Validity of synthetic training device instructor endorsement (c) (1) and (2)

Proposal: replace "received" with "receiving" and "passed" with "passing"

response	Accepted

The wording was modified.

comment	*266*	comment by: *BCAA*

Spelling

P43 – ATCO.C.040(c)(1) "If the STDI endorsement has expired, it may be renewed by received refresher training on practical instructional techniques. In addition, for STDIs not holding a valid unit endorsement, knowledge on the current operational practices shall be ensured"
(2) successfully passed a practical instructor competence assessment.
By "receiving", "passing"

response	Accepted

The wording was modified.

comment	*286*	comment by: *EUROCONTROL*

ATCO.C.040 Validity of synthetic training device instructor endorsement
(c) (1), (2)
Incorrect use of the past participle of
1. 'receive',
'pass'
Replace
1. 'received' by 'receiving',
'passed' by 'passing'.

response	Accepted

The wording was modified.

comment	410	comment by: *Naviair*

GM1 ATCO.C.040(d)
The wording amendments provide clarity as to the knowledge level required for STDIswho do not hold a valid unit endorsement

response	Accepted

The wording was modified.

AMC1 ATCO.C.040(b) Validity of the synthetic training device instructor endorsement   p. 43

comment	67 ❖	comment by: *LFV*

The period…. should not exceed 3 years.
This will cost a lot of administration to keep track of. A better writing would be that the refresher training should *always* be undertaken during the last two years of the validity of the endorsement.

response	Not accepted

See the explanation in comment #33 (similar to this case).

comment	263	comment by: *BCAA*

P41 – AMC1 ATCO.C.020(b) "The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement."
P43 – AMC1 ATCO.C.040(b) "The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement."
--> Planning issues may occur, as such refresher courses are typically done in calmer periods, or in the same month. The AMC does not allow for flexibility if e.g. the training is done one year at the beginning of March and 3 years later planned by the end of March. Easier would be to allow the refresher course always to be undertaken in the last 1 (or 2) years of the validity.

response	Not accepted

See the explanation in comment #33 (similar to this case).

comment	357	comment by: *TO Austro Control*

The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validity is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the STDI has successfully passed the refresher training, which of course should not be done too early within that period.

For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex.
**We therefore suggest to delete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the
last 2 years (alternatively during the last year) of the validity of the endorsement.**

response	Not accepted
	See the explanation in comment #33 (similar to this case).

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comment	*384*	comment by: *FABEC TTF*

Standardisation of the processes of the auditee organisation is key in order to make oversight activities easier and more efficient. From an oversight perspective, it is indeed much easier to control and monitor standardised activities instead of different activities in terms of size and complexity. European legislation gives the provider a strict and clear description of what and when something has to be done and implemented, but, at the same time, providers have the freedom to develop their management system to suit their commitments and desires. ATCO Licencing requirements can be considered as one of the main contributors to aviation risk reduction, so they should not be changed without a direct link to aviation safety. The requirement that forces ANSPs to organise a refresher training for OJTIs/STDIs every 3 years does not have any link to aviation safety. However, this has a direct influence on the ANSP's internal organisation, where the organisation depends on internal objectives (what is planned for the next period: 1-5 years). Having a large number of OJTIs/STDIs, some of them regularly provide training to trainees, some are used as a backup or, in agreement with the management of the organisation, they perform their OJTI/STDI activities as a part-time job. We have never encountered a situation where OJTIs/STDIs are not able to perform their duties as described in the internal procedures. In addition, during the delivery of the OJT phase, we didn't notice that OJTIs had any, even small, deviations from actual processes that could have an influence on safety. The selection process of OJTIs should suit organisational commitments, taking into consideration the requirements of the Commission Regulation (EU) 2017/373, which shall be bonded to the highest safety standards. We don't see how this requirement improves the safety or even administrative activities of the ANSP; on the other hand, it rather creates unnecessary administrative burden in a system which is already very complex and demanding daily maintenance and monitoring. We strongly advise removing the requirement for the 3 years period between two succeeding refresher courses on practical instructional techniques for the OJTI and STDI endorsement and finding another useful way to streamline oversight activities.

response	Not accepted
	See the explanation in comment #33 (similar to this case).

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comment	*494*	comment by: *Fintraffic Air Navigation Services*

This is a needless paragraph and does not clarify the process. The existing
statement on when refresher training should be received is very clear. This new

paragraph in practice leads to a situation where refresher training will always come earlier during a single validity period, because ATCOs will have to be put to a refresher training course well before the three year period is expiring to cover for any eventualities that might happen, thus forcing the next deadline of a refresher course to come earlier.

response	Not accepted
	See the explanation in comment #33 (similar to this case).

comment	*495*	comment by: *Fintraffic Air Navigation Services*

What needs clarification, is to have a statement when the application for the revalidation can be done. In a case when refresher training is done one year after the first endorsement, it should be possible to apply for the revalidation right after the succesful completion of the refresher training, and the revalidated, new expiry date of the endorsement should go forward 3 years from the original expiry date. Now this process is not clear and requires clarification.

response	Not accepted
	See the explanation in comment #33 (similar to this case).

comment	*586*	comment by: *CAA Norway*

- We do not see the intension behind: "For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement".

AMC1 ATCO.C.040(b) Validity of the synthetic training device instructor endorsement
The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement.

response	Not accepted
	See the explanation in comment #33 (similar to this case).

comment	*626*	comment by: *European Transport Workers Federation - ETF*
	This is too much of a burden, more dates to track. Why ? We are opposed !	
response	Not accepted See the explanation in comment #33 (similar to this case).	

comment	*648*	comment by: *NSA Austria*
	The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validty is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the STDI has successfully passed the refresher training, which of course should not be done too early within that period. For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex. **We therefore suggest to delete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the** **last 2 years (alternatively during the last year) of the validity of the endorsement.**	
response	Not accepted See the explanation in comment #33 (similar to this case).	

ATCO.C.035 Application for synthetic training device instructor endorsement   p. 43

comment	*390*	comment by: *FABEC TTF*
	The proposed changes to introduce the concept of CBTA for the training of coaches and assessors are understood in principle but should include differentiations in the behaviour to be observed and competence concerning safety (ref. 2. Safety and efficiency management - Ensure safety and efficiency of the operation during training). An instructor working in a simulation environment is subject to different conditions regarding immediate intervention in traffic control. The criteria to be met do not apply here.	
response	Noted The revision of the CBTA framework to ensure a minimum training for instructors and assessors is proposed in Part ATCO, Subpart D, Section 5. The comments recorded under that part for the training of instructors and assessors reflect the adaptation of the initial framework.	

GM1 ATCO.C.040(d) Validity of synthetic training device instructor endorsement   p. 44

comment	*21*	comment by: *GdF*

	To ensure harmonisation, this should be elevated to AMC-level.
response	Accepted Wording and status modified and aligned.

comment	*244*	comment by: *CANSO*
	GM1 ATCO.C.040(d) The wording amendments provide clarity as to the knowledge level required for STDIs who do not hold a valid unit endorsement	
response	Accepted	

comment	*289*	comment by: *EUROCONTROL*
	GM1 ATCO.C.040(d) Validity of synthetic training device instructor endorsement. The validity of an STDI endorsement is at the level of GM but that of an assessor endorsement is at AMC level. Points (a) and (b) should be raised to AMC level similar to ATCO.C.060 Validity of assessor endorsement. Points (c) – (e) should be retained as GM because they are beneficial and additional to the previous two measures. Points (a) and (b) of GM1 ATCO.C.040(d) should be raised to AMC level Retain points (c) – (e) as GM	
response	Accepted Wording modified.	

comment	*388*	comment by: *FABEC TTF*
	The requirements listed for possible refresher training (for instructors and assessors not holding a valid unit endorsement) are described in different categories: These are similar requirements but mentioned once in the GM and another time in the AMCs. This creates confusion and is not consistent.	
response	Accepted Wording modified and status aligned.	

comment	*448*	comment by: *AESA*
	It seems that the examples of current operational practices are not similar or equivalent. Should this GM better apply to ATCO.C.040(b) instead of (d)? Additionally, this guidance material may also be included in AMC1 ATCO.C.030 (b)(2).	
response	Accepted	

Wording modified and status aligned.

GM1 ATCO.C.040(b) ;(c) Validity of synthetic training device instructor endorsement　　p. 44

comment	*267*	comment by: *BCAA*

P44 – GM1 ATCO.C.040(b)(c) "REVALIDATION AND RENEWAL"
P47 – GM1 ATCO.C.060(b)(c) "REVALIDATION AND RENEWAL"
Why renewal is added? There is already an assessment for renewal ATCO.C.040(c)(2)

response	Accepted

ATCO.C.045 Assessor privileges　　p. 45

comment	*22*	comment by: *GdF*

propose: "...privileges of that endorsement for an preceding..."

response	Accepted

comment	*68*	comment by: *LFV*

ATCO.C.045 (c) 2 + AMC1 ATCO.C.045(c) 2

For assessors holding an ATCO licence with a valid unit endorsement the knowledge of current operational practices is by definition demonstrated, otherwise he or she wouldn't have a valid unit endorsement. Better writing would be to remove the word "demonstrate" in the IR and rewrite the AMC : A valid unit endorsements ensures the knowledge of current operational practices. For assessors not holding…………may be achieved by other means.

response	Accepted

AMC1 ATCO.C.045(c)(2) is removed.

comment	*103*	comment by: *ENAIRE*

ATCO.C.045 (d) (1):
From the text we understand that the exercise of the privileges of the endorsement for at least 1 year could have occurred at any previous moment. Is this interpretation correct?

response	Noted

The new wording indicates the year before.

comment	*157*	comment by: *German NSA (BAF)*

ATCO.C.045 Assessor privileges (c) (1)

	"at least 2 years' experience in the rating and rating endorsement(s) they will assess; and" Proposal: Add GM in order to clarify that this requirement does not apply when performing assessments according to ATCO.C.045 (b) (5).
response	Not accepted There is no need for GM because the text is modified to better reflect the privileges. In addition, the 2 years of experience in the rating and rating endorsement(s) is a basic condition, so no need for GM.

comment	*158*	comment by: *German NSA (BAF)*
	ATCO.C.045 (d) (1)	Assessor privileges
	"for an preceding" Proposal: "for a preceding"	
response	Accepted	

comment	*245*	comment by: *CANSO*
	(d) (2) for assessing the competence of an applicant for the issue or renewal of an STDI endorsement, if they have exercised the privileges of an STDI or OJTI endorsement for at least 3 years; (3) for assessing the competence of an applicant for the issue or renewal of an OJTI endorsement, if they have exercised the privileges of an OJTI endorsement for at least 3 years; Comment: The need to allow the assessment of competence of an applicant for the issue or renewal of an OJTI endorsement only to assessors with a history of an OJTI endorsement is needless hierarchy between OJTI and STDI. In the opinion of CANSO members also STDIs should be allowed to assess the competence of OJTIs. The instructional skills and knowledge needed during an assessment of OJTI competence are the same, and thus would cause no safety issues.	
response	Not accepted In the case of OJTIs, their privileges are to go in operational environment and conduct OJT also in the STD environment. However, for the STDIs, the same privileges are not applicable, some being attached only to the STD environment.	

comment	*411*	comment by: *Naviair*
	(d) for assessing the competence of an applicant for the issue or renewal of an STDI endorsement, if they have exercised the privileges of an STDI or OJTI endorsement for atleast 3 years;	

for assessing the competence of an applicant for the issue or renewal of an OJTI endorsement, if they have exercised the privileges of an OJTI endorsement for at least 3years;

Comment: The need to allow the assessment of competence of an applicant for the issueor renewal of an OJTI endorsement only to assessors with a history of an OJTI endorsement is needless hierarchy between OJTI and STDI. In the opinion of Naviair also STDIs should be allowed to assess the competence of OJTIs. The instructional skills and knowledge needed during an assessment of OJTI competence arethe same, and thus would cause no safety issues.

response	Not accepted
	In the case of OJTIs, their privileges are to go in operational environment and conduct OJT also in the STD environment. However, for the STDIs, the same privileges are not applicable, some being attached only to the STD environment.

comment	*453*	comment by: *AESA*
	Considering the new CBTA framework, maybe a maximum seniority limit since the assessor exercised the privileges of OJTI or STDI endorsement should be included.	
response	Noted	
	The seniority is included in the requirements 'have exercised the privileges for at least 3 years as OJTI /STDIs'. It is up to the ANSP to decide what is the seniority required for an ATCO with OJTI/STDI endorsements in order to be qualified as assessor.	

comment	*463*	comment by: *IAA*
	(d)(3) for assessing the competence of an applicant for the issue or renewal of an OJTI endorsement, if they ~~hold an OJTI endorsement and~~ have exercised the privileges of that an OJTI endorsement for at least 3 years;	
	The removal of `~~hold an OJTI endorsement~~`*in (d)(3)* is supported by the IAA.	
	However, has the change considered the potential for assessor knowledge fade of practical instructional technique skills, as removing the requirement to hold an OJTI endorsement, also removes the refresher training outlined in ATCO.C020(b) `...*successfully completing refresher training on practical instructional techniques skills...*`.	
	The requirements should assure Assessors remain knowledgeable of practical instructional techniques skills, if the asssessor will assess STDI or OJTI applicants, in accordance with ATCO.C.045 (d)(2) or (d)(3).	
response	Noted	
	The assessors remain competent through the conditions for revalidation/renewal, while those without a valid unit endorsement by demonstrating knowledge of operational practices.	

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With the implementation of the CBTA principles and framework for practical instructor and assessors the 'knowledge fade' should be prevented and assessors should have required minimum expertise of instructors' competence regardless of how long in the past they have exercised the instructor privileges. The assessor refresher training could include these elements as well.

comment	*474*	comment by: *EDA*

In point d (1), with the deletion of the word "immediately", it reads as it could have been a privilege exercised more than 1 year before the application. Please proceed with the changes suggested in other instances.

response	Not accepted

Alignment throughout the regulation was ensured.

comment	*492*	comment by: *Fintraffic Air Navigation Services*

Proposed text in NPA: (2) for assessing the competence of an applicant for the issue or renewal of an STDI endorsement, if they have exercised the privileges of an STDI or OJTI endorsement for at least 3 years;
(3) for assessing the competence of an applicant for the issue or renewal of an OJTI endorsement, if they have exercised the privileges of an OJTI endorsement for at least 3 years;

Comment: The need to allow the assessment of competence of an applicant for the issue or renewal of an OJTI endorsement only to assessors with a history of an OJTI endorsement is needless hierarchy between OJTI and STDI. In the opinion of Fintraffic ANS also STDIs should be allowed to assess the competence of OJTIs. The instructional skills and knowledge needed during an assessment of OJTI competence are the same, and thus would cause no safety issues.

response	Not accepted

In the case of OJTIs, their privileges are to go in operational environment and conduct OJT also in the STD environment. However, for the STDIs, the same privileges are not applicable, some being attached only to the STD environment.

AMC1 ATCO.C.045(c)(2) Assessor privileges   p. 46

comment	*6*	comment by: *DFS Deutsche Flugsicherung GmbH*

We suggest the following change:
For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices **shall be achieved by means of a unit competence scheme for revalidation of a unit endorsement.**
~~may be achieved during the refresher training in accordance with the unit competence scheme.~~
For assessors not holding a valid unit endorsement, the demonstration of knowledge of current operational practices may be achieved by other means.

	Justification: adapt the text to have focus on having assessor with operational knowledge – that is proven by measures in UCS – there is no (need to have) extra measures.
response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

comment	*68* ❖	comment by: *LFV*
	ATCO.C.045 (c) 2 + AMC1 ATCO.C.045(c) 2 For assessors holding an ATCO licence with a valid unit endorsement the knowledge of current operational practices is by definition demonstrated, otherwise he or she wouldn't have a valid unit endorsement. Better writing would be to remove the word "demonstrate" in the IR and rewrite the AMC : A valid unit endorsements ensures the knowledge of current operational practices. For assessors not holding............may be achieved by other means.	
response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.	

comment	*69*	comment by: *LFV*
	Should be harmonised with STDI (GM1 ATCO.C.040(d)) in a GM	
response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.	

comment	*222*	comment by: *CANSO*
	AMC1 ATCO.C.045(c)(2) Assessor privileges We suggest the following change: For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices **shall be achieved by means of a unit competence scheme for revalidation of a unit endorsement.** ~~may be achieved during the refresher training in accordance with the unit competence scheme.~~ For assessors not holding a valid unit endorsement, the demonstration of knowledge of current operational practices may be achieved by other means. Justification: adapt the text to have focus on having assessor with operational knowledge – that is proven by measures in UCS – there is no (need to have) extra measures.	
response	Accepted	

AMC1 ATCO.C.045(c)(2) has been is removed.
Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

comment	265	comment by: *BCAA*

P42 – AMC1 ATCO.C.030(b)(2) "For STDIs holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices should be achieved during the refresher training in accordance with the unit competence scheme."
P46 – AMC1 ATCO.C.045(c)(2) "For assessors holding an ATCO licence with a valid unit endorsement, ~~The~~ the demonstration of knowledge of current operational practices may be achieved during the refresher training in accordance with the unit competence scheme."
Discrepancy "should" vs "may"

response	Accepted

Accepted

AMC1 ATCO.C.045(c)(2) has been removed.
Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

comment	310	comment by: *EUROCONTROL*

AMC1 ATCO.C.045(c)(2) Assessor privileges
For assessors not holding a valid unit endorsement, the demonstration of knowledge of current operational practices may be achieved by other means
Clarification required:
There should be GM to elaborate 'other means'.
Is this somehow being covered in AMC1 ATCO.C.060 (e) – if yes, then the 'e' is probably a typo and should be 'c' as there is no 'e'

response	Accepted

Accepted

AMC1 ATCO.C.045(c)(2) has been removed.
Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

comment	358	comment by: *TO Austro Control*

We suggest the following change:
For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices **is achieved by means of a unit competence scheme for revalidation of a unit endorsement.** ~~may be achieved during the refresher training in accordance with the unit competence scheme.~~
For assessors not holding a valid unit endorsement, the demonstration of knowledge of current operational practices may be achieved by other means.

Justification:
adapt the text to have focus on having assessor with operational knowledge – that is proven by measures in UCS – there is no need to have extra measures.
In addition, for assessors not holding a valid unit endorsement, knowledge on the current operational practices shall be ensured.

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"may be achieved" – refresher training is only one means of the unit competence scheme

response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

comment	*412*	comment by: *Naviair*
	AMC1 ATCO.C.045(c)(2) Assessor privileges We suggest the following change: For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledgeof current operational practices **shall be achieved by means of a unit competence scheme for revalidation of a unit endorsement.** ~~may be achieved during the refresher training in accordance with the unit competence scheme.~~ For assessors not holding a valid unit endorsement, the demonstration of knowledge of currentoperational practices may be achieved by other means. Justification: adapt the text to have focus on having assessor with operational knowledge – that is proven bymeasures in UCS – there is no (need to have) extra measures.	
response	Accepted AMC1 ATCO.C.045(c)(2) have been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.	

comment	*593*	comment by: *FOCA Switzerland*
	We suggest to replace the current proposal with "For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices is achieved by means of a unit competence scheme for revalidation of a unit endorsement." Indeed, we suggest to focus on having assessor with operational knowledge – that is proven by measures in UCS. Adding other means to demonstrate the knowledge does not seem to be necessary for us.	
response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.	

comment	*649*	comment by: *NSA Austria*
	We suggest the following: For assessors holding an ATCO licence with a valid unit endorsement, the demonstration of knowledge of current operational practices **is achieved by means of a unit competence scheme for revalidation of a unit endorsement.** ~~may be achieved during the refresher training in accordance with the unit competence scheme.~~	

For assessors not holding a valid unit endorsement, the demonstration of knowledge of current operational practices may be achieved by other means.

Justification:
adapt the text to have focus on having assessor with operational knowledge – that is proven by measures in UCS – there is no need to have extra measures.
In addition, for assessors not holding a valid unit endorsement, knowledge on the current operational practices shall be ensured.
"may be achieved" – refresher training is only one means of the unit competence scheme

response	Accepted AMC1 ATCO.C.045(c)(2) has been removed. Instead, GM1 ATCO.C.060(b);(c)(1) has been introduced.

ATCO.C.060 Validity of assessor endorsement   p. 46

comment	*159* comment by: *German NSA (BAF)* ATCO.C.060 Validity of assessor endorsement (b) "by successfully completing a refresher training" Proposal: "by successfully completing refresher training" Rationale: Refresher training can consist of different elements (e.g. theoretical instruction, practical instruction, supervision) and this would also be consistent with the wording used elsewhere in the regulation.
response	Accepted The 'successful completion' has been replaced throughout the text of the regulation.

ATCO.C.055 Application for assessor endorsement   p. 46

comment	*311* comment by: *EUROCONTROL* **ATCO.C.055 Application for assessor endorsement** (b) within the 12 months preceding the application have successfully completed an assessor course ~~during which the required knowledge and skills are taught using theoretical and practical methods~~, and have been appropriately assessed on the required competence, as set out in ATCO.D.095. Clarification required: This deletion may be understood that the assessment of the required competence is not linked to the course itself and could be done independently in the unit! If that was intention then OK but it may create different interpretation of the same rule.
response	Accepted Text modified for clarification.

AMC1 ATCO.C.060(e) Validity of the assessor endorsement   p. 47

comment	34	comment by: *skeyes*

For assessors not holding a valid unit endorsement, knowledge on current operational practices may be achieved by various activities agreed between the training organisation and the competent authority, such as: (a) practice of ATCO skills on synthetic training devices; or (b) real-time validation (as ATCO) of synthetic training device exercises; or (c) familiarisation visits to operational units; or (d) attending professional conferences; or (e) attending presentations on new operational techniques, controller tools and airspace modernisations organised by operational units.	Request to harmonise with STDI (GM1 ATCO.C.040(d)) and implement this as Guidance Material instead of Acceptable Means of Compliance

response	Accepted

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comment	290	comment by: *EUROCONTROL*

AMC1 ATCO.C.060(e) Validity of the assessor endorsement

Points (c) – (e) do not offer the same level of expertise as the previous two points. Points (c) – (e) should be reduced to GM level

Reduce points (c) – (e) of AMC1 ATCO.C.060(e) to GM level.

response	Accepted

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comment	293	comment by: *EUROCONTROL*

"The holder of the assessor endorsement shall also holds a unit endorsement with the associated.." - typo

Replace 'holds' by 'hold'

response	Accepted

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comment	389	comment by: *FABEC TTF*

The requirements listed for possible refresher training (for instructors and assessors not holding a valid unit endorsement) are described in different categories: These are similar requirements but mentioned once in the GM and another time in the AMCs. This creates confusion and is not consistent.

response	Accepted

ATCO.C.065 Temporary assessor authorisation   p. 47

comment	*54*	comment by: *GdF*

Agree.

proposal: "endorsement shall also hold~~s~~ a unit endorsement"

response	Accepted

comment	*88*	comment by: *EPN*

Typo - (a) ....shall also holds....

response	Accepted

comment	*160*	comment by: *German NSA (BAF)*

ATCO.C.065 Temporary assessor authorisation (a)

"the holder of the assessor endorsement shall also holds a unit endorsement"
Proposal: "the holder of the assessor endorsement also holds a unit endorsement"

response	Accepted

comment	*199*	comment by: *Estonian Transport Administration*

There is probably a typo - 'shall also hold~~s~~'

response	Accepted

comment	*269*	comment by: *BCAA*

P47 – ATCO.C.065 "provided that the holder of the assessor endorsement shall also hold~~s~~ a unit endorsement with the associated rating and, if applicable, rating endorsement, relevant to the assessment for ~~an immediately~~ preceding period of at least one year"
"hold"
"for the preceding period"; it should be clear it is the period just before

response	Accepted

comment	*464*	comment by: *IAA*

ATCO.C.065 (a)

'...ATCO.C.045(b)(3) and (4) to cover exceptional situations or to ensure the independence of the assessment, provided that the holder of the assessor endorsement shall also holds a unit endorsement with the associated rating and, if applicable, rating endorsement, relevant to the assessment for an immediately preceding period of at least one year...'

	Suggested editorial change, `holds` to `hold` or review the sentence.
response	Accepted

AMC1 ATCO.C.060(b) Validity of the assessor endorsement   p. 47

comment	*67* ❖	comment by: *LFV*

The period…. should not exceed 3 years.
This will cost a lot of administration to keep track of. A better writing would be that the refresher training should *always* be undertaken during the last two years of the validity   of   the   endorsement.

response	Not accepted

There were situations when the distance between two courses would be between 4-6 years, which is not acceptable. Therefore, securing a 3-year periodicity would provide for a better planning of the courses. In addition, in the case of the first revalidation, it would set the frequency for the courses that could be followed and allows flexibility in terms of planning.

comment	*209*	comment by: *DFS Deutsche Flugsicherung GmbH*

We suggest the following amendment:
~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement

Justification:
The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenend from revalidation period to revalidation period.
For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore the first sentence should be deleted.
In order to reduce the period in which refresher trainings shall be performed between two validity dates, we also suggest to delete "first" in the second sentence.

response	Not accepted

See the response to comment #67.

comment	*223*	comment by: *CANSO*

We suggest the following amendment:
~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher

training should be undertaken during the last 2 years of the validity of the endorsement

Justification:
The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenend from revalidation period to revalidation period.
For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore the first sentence should be deleted.
In order to reduce the period in which refresher trainings shall be performed between two validity dates, we also suggest to delete "first" in the second sentence.

response	Not accepted
	See the response to comment #67.

comment	*359*	comment by: *TO Austro Control*

The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validity is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the assessor has successfully passed the refresher training, which of course should not be done too early within that period.
For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex.
We therefore suggest to deleete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the
last 2 years (alternatively during the last year) of the validity of the endorsement.

response	Not accepted
	See the response to comment #67.

comment	*413*	comment by: *Naviair*
	We suggest the following amendment:	

~~The period between two succeeding refresher courses on practical instructional techniques should not exceed 3 years.~~ For the ~~first~~ revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement

Justification:
The first sentence "the period between two succeeding courses... should not exceed 3 years" will have the consequences that the planning period for the next refresher course would move forward, away from the validity date. The planning period will be shortenendfrom revalidation period to revalidation period.
For planning reasons (especially for large units with lot of staff) it is recommended to focus on the revalidation date and not on the date of the refresher course. Therefore thefirst sentence should be deleted.
In order to reduce the period in which refresher trainings shall be performed between twovalidity dates, we also suggest to delete "first" in the second sentence.

response	Not accepted
	See the response to comment #67.

comment	*587*	comment by: *CAA Norway*
	• We do not see the intension behind: "For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement".	
	AMC1 ATCO.C.060(b) Validity of the assessor endorsement	
	The period between two succeeding refresher courses on assessment techniques should not exceed 3 years. For the first revalidation, the refresher training should be undertaken during the last 2 years of the validity of the endorsement.	

response	Not accepted
	See the response to comment #67.

comment	*650*	comment by: *NSA Austria*
	The first sentence would imply that the validity period is not three years but dependent on the next date of refreshing, shortened to that earlier date. This will exorbitantly increase the administration for the planning. Today, the validty is three years from the point of first issue. This will be the counting date for all refreshing measures until withdrawal. The prolongation of the endorsement will be issued for that date three years later, in case the assessor has successfully passed the refresher training, which of course should not be done too early within that period. For ANSPs with many ATCO staff having various additional roles for training, the individual design of deadlines depending on the previous deadlines is very time-consuming and complex.	
	We therefore suggest to deleete the first sentence. Or analog to first issuance: the refresher training should be undertaken during the **last 2 years (alternatively during the last year) of the validity of the endorsement.**	

response	Not accepted
	See the response to comment #67.

GM1 ATCO.C.060(b) ;(c) Validity of assessor endorsement — p. 47

comment	*246*	comment by: *CANSO*

GM1 ATCO.C.060(b)   Successful completion of the refresher training in assessment techniques is concluded with an evaluation of the competence against established performance criteria.

CANSo is happy with this being GM, but the verb "is" is wrong. The correct verb should be "could be".

response	Accepted

comment	*268*	comment by: *BCAA*

P44 – GM1 ATCO.C.040(b)(c) "REVALIDATION AND RENEWAL"
P47 – GM1 ATCO.C.060(b)(c) "REVALIDATION AND RENEWAL"
Why renewal is added? There is already an assessment for renewal ATCO.C.040(c)(2)

response	Accepted

comment	*414*	comment by: *Naviair*

GM1 ATCO.C.060(b)   Successful completion of the refresher training in assessment techniques is concluded with an evaluation of the competence against established performance criteria.

Naviair is happy with this being GM, but the verb "is" is wrong. The correct verb should be"could be".

response	Accepted

comment	*496*	comment by: *Fintraffic Air Navigation Services*

Fintraffic ANS is happy with this being GM, but the verb "is" is wrong. The correct verb should be "could".

response	Accepted

ATCO.D.003 Principles of competency-based training and assessment — p. 50

comment	*8*	comment by: *DFS Deutsche Flugsicherung GmbH*

point (b) (3): validity and reliability are scientific terms and base on surveys and statistics with described criteria and measures. We cannot do this in small units, so validity must also be given when an expert has assessed it.
We suggest to extent point (3):
(3) evidence of competent performance is valid and reliable **or based on expert opinion**;

response	Accepted
	This requirement is deleted and (b)(4) is modified.

comment	*35*	comment by: *skeyes*

instructors' and assessors' judgements are calibrated to achieve a high degree of inter-rater reliability; and	Wording is unclear; what does calibrated mean?

response	Accepted
	The text is modified to clarify that a process should be in place to ensure that there is consistency of assessments between instructors and assessors who are assessing the same performance using the same adapted competency model. GM will be provided at a later stage on how this can be achieved.

comment	*210*	comment by: *Air Traffic Control the Netherlands*

Regarding the text :*(b) (1) there is an explicit link between competencies and training, required performance, and assessment":*
Please clarify:

- Whether this also applies to theory or only to skills
- Whether it is needed to follow the specied indicators or whether we can divide the higher level competences into smaller ones

response	Noted
	Any competency that requires the acquisition of underpinning knowledge prior to the demonstration of competence may be either examined, if required by the IR, or assessed as part of the practical performance. The intent of the second bullet is unclear, however in developing a grading system it is possible to divide the competencies into smaller units of measurement. In an adapted competency model, the competencies are associated with observable behaviours, and observable behaviours may be supported by an evidence guide.

comment	*213*	comment by: *DFS Deutsche Flugsicherung GmbH*
	point (b) (4): how is "inter-rater reliability" to be understood? The application of the following requirements for CBTA-based training and judgement seems to be the implicit evidence for that reliability. Is this correct?	
response	Accepted The text is modified to clarify that a process should be in place to ensure that there is consistency of assessments between instructors and assessors who are assessing the same performance using the same adapted competency model. GM will be provided at a later stage on how this can be achieved.	

comment	*224*	comment by: *CANSO*
	point (b) (3): validity and reliability are scientific terms and base on surveys and statistics with described criteria and measures. We cannot do this in small units, so validity must also be given when an expert has assessed it. We suggest to extent point (3): (3) evidence of competent performance is valid and reliable **or based on expert opinion**;	
response	Accepted This requirement is deleted and (b)(4) is modified.	

comment	*225*	comment by: *CANSO*
	point (b) (4): how is "inter-rater reliability" to be understood? The application of the following requirements for CBTA-based training and judgement seems to be the implicit evidence for that reliability. Is this correct?	
response	Accepted The text is modified to clarify that a process should be in place to ensure that there is consistency of assessments between instructors and assessors who are assessing the same performance using the same adapted competency model. GM will be provided at a later stage on how this can be achieved.	

comment	*415*	comment by: *Naviair*
	point (b) (3): validity and reliability are scientific terms and base on surveys and statisticswith described criteria and measures. We cannot do this in small units, so validity must also be given when an expert has assessed it. We suggest to extent point (3): (3) evidence of competent performance is valid and reliable **or based on expert opinion**	
response	Accepted This requirement is deleted and (b)(4) is modified.	

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comment	416	comment by: *Naviair*

point (b) (4):
how is "inter-rater reliability" to be understood?
The application of the following requirements for CBTA-based training and judgement seemsto be the implicit evidence for that reliability. Is this correct?

response	Accepted

The text is modified to clarify that a process should be in place to ensure that there is consistency of assessments between instructors and assessors who are assessing the same performance using the same adapted competency model. GM will be provided at a later stage on how this can be achieved.

comment	493	comment by: *FOCA Switzerland*

As explained in the section "general comment", more flexibility is required. Having binding rules for CBTA is not in line with ICAO doc 9868 defining CBTA as an option. Therefore, we recommand to move these rules to GM.

response	Not accepted

To support the real mutual recognition of the ratings, the initial training required further harmonisation. PANS-Training Doc 9868 does not prevent a State from defining an adapted competency model for harmonisation purposes. The same flexibility as that provided by ICAO is provided for unit training.

ATCO.D.001 Objectives of air traffic controller training   p. 50

comment	318	comment by: *Europe Air Sports*

EAS Comment :

EAS demands that the operation and activities of airsports as accredited airspace users must be taught during the basic Training of ATC controllers.

VFR operation and the see-and-avoid principle including the operations of all airsports categories from ballooning, gliding, hang and paragliding, parachuting, powered flying and microlight flying, not to forget model flying, must be part of the training of controllers, especially because the airspace structures and rules are so different in the EU.
In some Member States uncontrolled airspace is up to FL 195, in some Member States VFR traffic is not positively controlled in controlled airspace E.

In the light of the growing drone industry we will experience that the drone industry will soon demand more airspace. The same applies for model flying which is becoming a regulated activity in EU. This must also be prepared for in the future ATCO training.

Please see our comment to ATCO.D.010 for an EAS suggestion.

response	Noted
	ATCOs are trained to provide services in accordance with the airspace classification. Future updates of ATCO training objectives will take into account the evolving aviation industry requirements.

comment	*365*	comment by: *Europe Air Sports*
	EAS Comment: EAS suggests to add the following comments on the training of next ATCO generation: • it should strengthen the public nature of the airspace and of the provision of ATS services, • it should continue to handle also the light aircraft category of airspace users which is often not fitted with the latest ATC technology • it should support the availability of services such as weather update and traffic situation (ADS-B Out on UAT).	

response	Noted
	• ATCOs are trained to provide services in accordance with the airspace classification. Definition of airspace and the provided services is not within the scope of the ATCO Regulation • usage of airspace by different categories of aircraft is addressed in the training objectives for ATCOs • the availability of services is not within the scope of the ATCO Regulation

ATCO.D.010 Composition of initial training   p. 51

comment	*120*	comment by: *GdF*
	We do not agree that this level of detail should be included in an IR. Instead, a reference to a new AMC should be created. Text proposal for IR: "Initial training, intended for an applicant for a student air traffic controller licence or for the issue of an additional rating and/or, if applicable, rating endorsement, shall consist of basic training and rating training." Text proposal for an AMC: "	

(1)
Basic training, should comprise at least of the following subjects:
SUBJECT 1: AVIATION LAW
SUBJECT 2: AIR TRAFFIC MANAGEMENT
SUBJECT 3: METEOROLOGY
SUBJECT 4: NAVIGATION
SUBJECT 5: AIRCRAFT
SUBJECT 6: HUMAN FACTORS
SUBJECT 7: EQUIPMENT AND SYSTEMS
SUBJECT 8: PROFESSIONAL ENVIRONMENT.

(2)
Rating training should comprise at least of one of the following ratings, including at least the enumerated subjects:

(i) Aerodrome Control Rating — ADC
SUBJECT 1: AVIATION LAW
SUBJECT 2: AIR TRAFFIC MANAGEMENT
SUBJECT 3: METEOROLOGY
SUBJECT 4: NAVIGATION
SUBJECT 5: AIRCRAFT
SUBJECT 6: HUMAN FACTORS
SUBJECT 7: EQUIPMENT AND SYSTEMS
SUBJECT 8: PROFESSIONAL ENVIRONMENT
SUBJECT 9: ABNORMAL AND EMERGENCY SITUATIONS
SUBJECT 10: AERODROMES;

[and so on]"

Firstly, this would be in line with the style of other IRs. Secondly, this would ensure harmonization, while as well allowing needed flexibility.

For additional reasoning, see comment 172.

response	Not accepted

Currently, subjects, topics and subtopics for basic and rating training are contained in the implementing rule (IR), in Appendices 2-7 to Annex I. With this proposed amendment, the topics and subtopics have been moved to AMC and only the subjects are kept at the IR level. The proposed level of detail in the IR is thus considerably reduced.

comment	*294*	comment by: *EUROCONTROL*
	Rationale ATCO.D.010 - Agree	
response	Noted	

comment	*317*	comment by: *Europe Air Sports*

In this NPA the annexes 2 to 7 in which the detailed training contents where listed and prescribed have been removed.

The replacing general listings in ATCO.D.010 Initial Training are too general and, if the AMCs which are not published yet, do not contain similar detailed training contents and requirements it will be difficult to achieve the high and equal level of competence throughout the EU and ECAC member states ATC service providers.

EAS suggests a review of the NPA to ensure that the level of detail in the requirements is sufficient and includes material pertinent to the controlling of General Aviation, sports and recreational aircraft. EAS would be happy to offer its expertise about this segment of avitation to the rulemaking team.

response | Noted

As explained in the NPA, the topics and subtopics have been moved from the implementing rule (IR) level to AMC to allow a quicker update of the training content. The AMC on training content have been published and will remain the same. The only changes proposed to these AMC are text changes caused by the removal of topics and subtopics to AMC level.

comment | ***366***   comment by: *Europe Air Sports*

Attachment #2

EAS Comment:

EAS would like to remind EASA of the recommendation made by CANSO and Eurocontrol in their last *European Action Plan for Airspace Infringement Risk Reduction EAPAIRR - Version 2.0/March 2022/.*

Extract of Page 14 of 36 of the attached document 1044.pdf.

REF	Recommendation	Rationale
ANSP1	Ensure ATCO and FISO communication skills and discipline is included in FIS training and licensing/certification. See also recommendation AU8	This action reinforces the objectives and provisions of the Action Plan for Air Ground Communications, focusing on the aspects that are of particular importance in the communication exchange between ATS units and VFR flights. ATS staff should be trained to: Strictly apply the readback/hearback procedure; Actively seek confirmation in case of doubt; Use unambiguous call-signs - full call-sign or call-sign coupled with type of aircraft; Use published reference points in ATS messages to pilots as far as possible; Use simple ATC clearances and instructions; Use more concise transmissions, if necessary broken into shorter segments; Use reduced rate of

		<mark>speech and better articulation when talking to VFR pilots</mark>; Issue pre-warning of instructions to be passed; Provide FIS in English language; Acquire adequate knowledge of and apply communication failure procedures as required. Improve and harmonise FISO training curriculum. The training curriculum should be improved to adequately match the level of service to be provided. FIC staff should receive dedicated training to <mark>improve their awareness and understanding of VFR flights' needs, specificities, and light aircraft performances</mark>. Best practices already exist (e.g., in Germany) to deliver emergency situation training to FIC staff and VFR pilots in a coordinated manner. A sufficient number of FIC staff should be made available to support the provision of enhanced FIS. A number of ATS providers have already implemented dedicated training programmes for staff that become redundant or underutilised due to the increasing automation of ATS provision (e.g., implementation of OLDI). See also 6.20 and 6.23 above. Add familiarization basic training for: ATCO and FISO in training meetings; for Pilots at ATC/FIS Centres.

response	Noted FISO training is not subject to the ATCO Regulation. For ATCOs, 'Communication' is an essential part of the training content. Communication (communicate effectively in all operational situations) is also one of the competencies that an ATCO has to demonstrate.

comment	*497*	comment by: *Fintraffic Air Navigation Services*
	Most of the subjects are the same for each Rating so could these be combined under one header without repeating separately for each rating?	

response	Noted
	This option was considered; it is, however, more appropriate to list the subjects for each rating, despite the repetition, to provide more clarity.

comment	*627*	comment by: *European Transport Workers Federation - ETF*
	We consider this change not to be in favour of a robust mutual recongnition process: what if there is an AltMOC approved with differences in the training content ?	

response	Noted
	The AltMoC process safeguards compliance with the requirements.

ATCO.D.005 Types of air traffic controller training   p. 51

comment	*589*	comment by: *FOCA Switzerland*
	We suggest to have a better separation between theoretical and practical content. As currently written the theoretical subjects need to be assessed in a practical environment, which is not feasible. This comment also apply to ATCO.D.010, ATCO.D.025 and ATCO.D.035.	

response	Noted
	Comment not understood. ATCO.D.035 continues to require both assessment(s) for practical performance and examinations for theoretical objectives. Subjects contain both practical and theoretical objectives. Detailed training development and delivery practices are not within the scope of this Regulation. The training in general, and ATCO initial training in particular, is a continuous process where both the theory and practice are very interrelated and, usually, the theory (levels 1 and 2 in the syllabus) is a prerequisite for practical application (levels 3, 4 and 5 in the syllabus). How they interact in a training is a matter of training design: the better the interaction, the higher the effectiveness and the successful outcome of the training are. That outcome is manifested in the results of the exams (theory) and the subsequent assessments (practical application). The content and regular updates of the initial training plan is covered in ATCO.D.015, including the processes for examinations and assessments in accordance with ATCO.D.025 and ATCO.D.035.

comment	*594*	comment by: *FOCA Switzerland*

We suggest to provide more clarity how the subjets and the competencies are related to each other. It is not clear how the "subjects" listed in ATCO.D.010 match with the required competencies defined in ATCO.D.035

response | Noted

Practical objectives in Subjects support demonstration of competency. Knowledge-based objectives in the Subjects are the underpinning requirements for acquisition of competency.

AMC1 ATCO.D.025(c)(d) Basic training examinations and assessment   p. 56

comment | *9*   comment by: *DFS Deutsche Flugsicherung GmbH*

Editorial:
It would be helpful to use same format in D.025 and D.035. Putting numbers under (c) in stead of bullets would be better.

response | Accepted

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comment | *121*   comment by: *GdF*

In line with our proposal (comment 120, 172), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

response | Not accepted

The introduction of competencies at IR level and observable behaviours, conditions and competency standards at AMC level ensures a minimum level of harmonisation.

The purpose of AMC is to make clear that what is defined is the minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programmes if they consider this necessary for their local environment.

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comment | *272*   comment by: *BCAA*

General comment: why use "examinations" (plural) and "assessment" (singular) in the header?
Applies to AMCs as well

response | Accepted

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comment | *274*   comment by: *BCAA*

typo: "BASIC" in the table is written in capital letters

response | Noted

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comment | *499*   comment by: *Fintraffic Air Navigation Services*

Could you clarify how this can be observed by the instructor? We would suggest deleting this as we donät see it adding value in addition to OB 1.1 and 1.2

response | Not accepted

This behaviour is observed through the subsequent actions of the student.

comment | *500* | comment by: *Fintraffic Air Navigation Services*

We would suggest simpler wording such as "Manages traffic safely"

response | Noted

This OB is focused on the techniques to manage the traffic safely. In all instances the student is required to maintain a safe and orderly traffic flow.

comment | *501* | comment by: *Fintraffic Air Navigation Services*

Could you clarify what is meant with "appropriate separation method"? We suggest deleting this as in OB 3.3 Applies appropriate separation methods and spacing, the student has chosen a method and then applies it. You can't really apply a separation method without choosing it and we find it irrelevant to track if a student chooses a correct method but then does not apply it.

response | Partially accepted

This OB is about evaluating whether a student makes appropriate choices on which separation method to use given the context. However, OB 3.3. which is the continuation of OB 3.2 is ambiguous and has been modified to clarify that once the separation method has been chosen, it is applied appropriately.

comment | *502* | comment by: *Fintraffic Air Navigation Services*

see OB 3.2. We suggest deleting this as this is covered by OB 3.4 Issues clearances and instructions that ensure that separation is maintained. When you issue clearances and instructions that ensure separation is maintained, then at the same time apply appropriate separation methods.

response	Partially accepted
	See the response to comment #501.

comment	*503*	comment by: *Fintraffic Air Navigation Services*
	We suggest adding spacing into this e.g. "Issues clearances and instructions that ensure that separation and spacing is maintained"	
response	Noted	
	With the amendment to OB 3.3 this suggestion would no longer be relevant as the 'spacing' part of OB 3.3 is deleted.	

comment	*504*	comment by: *Fintraffic Air Navigation Services*
	We suggest deleting this as OB 1.1 Monitors traffic in own area of responsibility covers monitoring of traffic whether a separation is in question or not.	
response	Not accepted	
	The intent of the comment is not understood. This OB is focused exclusively on maintaining separation as a key competency to be acquired, whereas OB 1.1 applies more generally to all traffic.	

comment	*505*	comment by: *Fintraffic Air Navigation Services*

	Would would prefer "Coordinates in a timely manner" as this would be a simpler phrase. We do not find it necessary to be on the list of action verbs.
response	Noted
	This OB goes beyond the timeliness of coordination. It has however been modified to focus the behaviour on the use of whatever coordination means is available.

comment	*506* comment by: *Fintraffic Air Navigation Services*
	Could you clarify what is meant with "standard ATS message formats" here? Our simulator does not allow for the student to change what kind of messages the systems produces.
response	Accepted
	This OB has been reworded to clarify that coordination using standard ATS formats is only applicable if the system enables this.

comment	*507* comment by: *Fintraffic Air Navigation Services*
	Could you clarify how the student can be considered to be competent if he/she does not make errors in the assessed exercise(s) according to ATCO.D.003 as "multiple observations" are required?
response	Accepted
	This OB has been modified to reflect that a student takes responsibility for their performance.

comment	*508* comment by: *Fintraffic Air Navigation Services*

> Could you clarify how can this be observed in an assessed exercise not taking into account the rest of the course?

response	Accepted This OB has been removed.

comment	*509* comment by: *Fintraffic Air Navigation Services*

> Could you clarify how can this be observed in an assessed exercise not taking into account the rest of the course?

response	Partially accepted This OB is necessary in circumstances where the student is required to engage with others in an operational context that has the potential to be challenging. Failure of this behaviour can lead to breakdown of team cooperation. However, it is recognised that these situations may not always occur. Consequently, the OB has been modified to 'if necessary'.

comment	*510* comment by: *Fintraffic Air Navigation Services*

> Could you clarify how this can be observed during a single assessed exercise where the student needs to perform without any prompts from the instructor?

response	Partially accepted This OB has been removed.

comment	*588* comment by: *FOCA Switzerland*

> We propose not to have an observable behaviours list for basic training. Indeed basic training is mainly theoretical training where an observation of a behaviour is rather

difficult if not impossible. It has to be recalled that the OBs defined in ICAO doc 9868 are defined for a fully qualified ATCO. Therefore, the OBs used for the earlier parts of the ab-initio training should be simplified or deleted as they are not relevant at that stage of training.

response	Noted
	The OBs apply to the required practical part of basic training. The OBs have been simplified and reduced considerably for the reasons stated in the comment. Doc 10056, Vol 1 Manual on Air Traffic Controller Competency-based Training and Assessment, in paragraphs 4.1.2.1 and 4.2.2.1, recognises that basic training is predominantly theory with some practical training, and confirms that 'it is advantageous to have present all the competencies that are ultimately required to succeed as an ATCO, as this will enhance the trainees' transition from initial to unit training'.

comment	*628*	comment by: *European Transport Workers Federation - ETF*
	To have Observable behaviours at AMC level is too prescriptive.
	Furthermore some OBs are dependent on perception such as OB 6.1 acts responsibly(...) this is not observable... not objective.

response	Noted
	Observable behaviours at AMC level ensure a minimum level of harmonisation. All basic OBs have been reviewed. OB 6.1 has been amended to focus on the student assuming responsibility for their own performance.

ATCO.D.025 Basic training examinations and assessment   p. 56

comment	*14*	comment by: *DFS Deutsche Flugsicherung GmbH*
	For the sake of EU-wide harmonisation it will not be possible to continue applying the CBTA method in the way DFS is training their students - see comment #1. Not even as AltMoC, since that would not provide for fulfilling the IR with these changes.
	While ICAO allows an adaptation of the provided elements for the CBTA in order to prepare for the local environment and particular capabilities of simulation, the European approach sets a common level for the sake of harmonisation. If that flexibility will no longer be allowed, we would need to
	• largely extent the preparation of students' readiness for unit training (it is not affordable to teach knowledge of common nature within each unit. Therefore, we have enlarged the basic and rating training with also a collection of elements of unit training, that are possible within classroom/simulation environment - this all would need a new break-down structure)

- largely adapt the training material, plans and assessment methods - administrative effort to change the documents
- extensively negotiate with the work council about those changes
- largely train all instructors, assessors and OJTIs (as mentioned, roughly 48 months) on the application of the new documents and changes to methods

while at the same time considering our cost and capacity performances for RP4.
And at the same time the probability of ATCO mobility is low due to language hurdles.

| response | Noted

See the response to comment #1. |

| comment | *197*   comment by: *Estonian Transport Administration*

In paragraphs (b) and (e) 'an applicant' has been replaced by 'a candidate'. However the similar logic hasn't been applied to point ATCO.D.035 (b) and (e). |
| response | Accepted |

| comment | *239*   comment by: *CANSO*

1. ATCO.D.025 Basic training examinations and assessment

(b) A pass in theoretical examination(s) shall be awarded to ~~an applicant~~ a candidate achieving a minimum of 75 % of the marks allocated to that examination.
(d~~e~~) A pass in assessment(s) shall be awarded to ~~an applicant~~ a candidate who consistently demonstrates the competencies defined in (c) above required performance as listed in ATCO.D.030 and shows the behaviour required for safe provision of the air traffic control service.

Note: The expression *'applicant'* in ATCO.D.025 has already been modified by Commission Implementing Regulation (EU) 2023/893, applicable from 4th of August 2024. |
| response | Accepted |

| comment | *247*   comment by: *CANSO*

ATCO.D.025 (c) The following competencies shall be assessed: — Traffic and capacity management: maintain a safe and orderly traffic flow

We would suggest changing this to "Traffic management" as we don't think that capacity managent is a relevant competency in Basic training, especially at IR level. |

response	Partially accepted
	The Basic and Rating training descriptions of this competency reflect different requirements for each type of training. In addition, the OBs contained in AMC1 ATCO.D.025 (c)(d) reflect the lower level of performance required from the student for Basic training.

comment	*273*	comment by: *BCAA*
	ATCO.D.025(a) "Basic training courses shall include theoretical examination(s) and assessment(s)." It is nowhere stated that the examination should be done on the content of all topics. Now it can be the case that an ITO organizes just 1 examination for basic training and that questions do not cover all topics. Preferably it is stated that (an) examination(s) shall cover all topics (or at least 1 question per topic).	

response	Noted
	The focus of this NPA has been on the introduction of the CBTA. The comment could potentially be considered in a future amendment. This Regulation is not prescriptive in terms of the examination content. It is common sense that all subjects (now at IR) and associated training content (topics/subtopics/objectives, now at AMC level) need to be covered in training. The examination and assessment processes (ATCO.D.015 (g)) need to be established by the TO and approved by the competent authority. The common practice is that exams for basic training (usually 80 % theoretical) are organised per subject while for rating training that is focused on the application (less than 20 % theory), if there are exams, there could be a combination of several subjects. Some TOs combine the subjects even in the basic training and still have high-quality multidisciplinary exams. It is up to the NCA to decide within the approval process if all these combinations are good enough or need further refinement.

comment	*335*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Some OBs (observable behaviors) are difficult to apply in ODFs: - OB 9.2 effectively manages interruptions and distractions. - OB 9.3 delegates tasks as necessary to reduce workload. - OB 10.5 responds appropriately to the needs of others. Will all OBs have to be applied and judged in a systematic way, or can an AMC discussion be initiated with the SLA when the time comes?	

response	Noted
	This appears to be a comment on AMC1 ATCO.D.035(c)(e). All rating training OBs have been reviewed. OB 9.2 is considered a necessary behaviour for a student ATCO and it is possible to integrate this into a designed exercise. OB 9.3 has been modified to reflect that this OB is only applicable if the circumstances or context warrant it. If the context does not require delegation of tasks, it is scored as not applicable. OB 10.5 is considered a necessary behaviour for a student ATCO.

In relation to AMC1 ATCO.D.035(c)(e), a description of the competency standard has been added to clarify the weighting of each competency when assessing performance.

comment	*417*	comment by: *Naviair*

1. <u>ATCO.D.025 Basic training examinations and assessment</u>

(b) A pass in theoretical examination(s) shall be awarded to ~~an applicant~~ a candidate achieving a minimum of 75 % of the marks allocated to that examination.
(de) A pass in assessment(s) shall be awarded to ~~an applicant~~ a candidate who consistently demonstrates the competencies defined in (c) above required performance as listed in ATCO.D.030 and shows the behaviour required for safe provision of the air traffic control service.

Note: The expression *'applicant'* in ATCO.D.025 has already been modified by Commission Implementing Regulation (EU) 2023/893, applicable from 4th of August 2024.

response	Accepted

comment	*418*	comment by: *Naviair*

ATCO.D.025 (c) The following competencies shall be assessed: — Traffic and capacity management: maintain a safe and orderly traffic flow

We would suggest changing this to "Traffic management" as we don't think that capacitymanagent is a relevant competency in Basic training, especially at IR level.

response	Partially accepted
	See the response to comment #247.

comment	*465*	comment by: *IAA*

(b) A pass in theoretical examination(s) shall be awarded to ~~an applicant~~ a candidate achieving a minimum of 75 % of the marks allocated to that examination.

One of the aims listed in the RMT summary, is to `ensure a more harmonised level of initial training output` to address the issue of `licence holders across the EU having different levels of proficiency and performance.`

However, this RMT does not appear to address the standard and conditions for the examination of Initial Training theory (knowledge). Example, for basic training subjects, the only requirement is for the *candidate to achieve a minimum of 75% of the marks allocated to that examination*. Therefore, the requirements do not specify an examination standard for initial training, just a pass mark.

<u>Examples illustrating the differences in standards of two ITO exam processes</u>

ITO 1, sets an examination for each basic training subject (eight) listed in AMC1 ATCO.D.010 (a)(1). Depending on the objectives, questions are set using appropriate question types - multiple choice, matching, essay type etc, according to the ITO's examination process. Examinations of each subject are typically 30-40 questions, duration 1 – 1.5 hours. 75% pass mark for each examination with 1x resit before additional training is required.

ITO 2, sets ONE examination of all subjects (eight) at the end of Basic Training. The examination has 100 questions, all multiple choice, all questions have equal marks, examination duration 2 hours. 1x resit before additional training is required.

Examination Standard Comparision
Currently, both ITO 1 & 2 appear to be in compliance with Commission Regulation 2015/340 requirements, as there is no AMC.
The standard of examination is determined by the training organisation (ITO).

ITO 1 exams each subject, combined - at least 240 questions , duration at least eight hours. Question type (multiple choice, matching, essay style etc) is based on the objective (verb). If a candidate fails a subject, the knowledge deficiency is identified to a specific subject.

ITO 2 examination process is 100 questions, durations 2 hours, multiple choice questions only. There is a possibility a candidate may achieve a pass (75%) mark and not answer any questions related to a subject, example ATM. It the examination had an equal number of questions for each subject, then there is a possibility to pass and not answer any question for two subjects (100/8=12.5 marks per subject).

response	Noted
	The focus of this NPA has been on the introduction of the CBTA. The comment is nonetheless noted to be considered in a future amendment.

comment	*475*	comment by: *EDA*
	In point c, the competencies listed mostly address the practical dimension of the basic course and not the theoretical part. Should this be clarified?	

response	Noted
	The focus of this NPA has been on the introduction of the CBTA. The comment is nonetheless noted to be considered in a future amendment.

comment	*498*	comment by: *Fintraffic Air Navigation Services*
	We would suggest changing this to "Traffic management" as we don't think that capacity managent is a relevant competency in Basic training, especially at IR level.	

response	Noted
	See the response to comment #247.

ATCO.D.035 Rating training examinations and assessment   p. 59

comment	*15* comment by: *DFS Deutsche Flugsicherung GmbH*
	For the sake of EU-wide harmonisation it will not be possible to continue applying the CBTA method in the way DFS is training their students - see comment #1. Not even as AltMoC, since that would not provide for fulfilling the IR with these changes.
	While ICAO allows an adaptation of the provided elements for the CBTA in order to prepare for the local environment and particular capabilities of simulation, the European approach sets a common level for the sake of harmonisation. If that flexibility will no longer be allowed, we would need to
	- largely extent the preparation of students' readiness for unit training (it is not affordable to teach knowledge of common nature within each unit. Therefore, we have enlarged the basic and rating training with also a collection of elements of unit training, that are possible within classroom/simulation environment - this all would need a new break-down structure) - largely adapt the training material, plans and assessment methods - administrative effort to change the documents - extensively negotiate with the work council about those changes - largely train all instructors, assessors and OJTIs (as mentioned, roughly 48 months) on the application of the new documents and changes to methods
	while at the same time considering our cost and capacity performances for RP4. And at the same time the probability of ATCO mobility is low due to language hurdles.
response	Noted
	The introduction of a European adapted competency model associated with the student ATCO licence (split across the IR and AMC) is intended to ensure a minimum, defined and known level of performance related to their ability to manage complex and dense traffic situations. It is not the intention of the IR/AMC to limit the ITOs ability to prepare their student ATCOs for unit training in their environment. The IR text has been amended to clarify that the requirements in ATCO.D.035 are a minimum and that more is possible. AMC detailing the conditions and competency standards for each rating will be revised to clarify that the requirement is a minimum.

References to the 'example airspace' have been deleted so as to remove any ambiguity that ITOs are required to develop a training airspace of these dimensions. It does however remain true that with this proposal that effort will be required to familiarise instructors and assessors with the application of the CBTA methodology.

comment	*46*	comment by: *Croatian Civil Aviation Agency*

The proposal is to use candidate instead of applicant.

Explanation:
Since in ATCO.D.025, word applicant has been replaced with word candidate, the same shall be done in ATCO.D.035.

response	Accepted

comment	*122*	comment by: *GdF*

We do not agree that this level of detail should be included in an IR. Instead, a new AMC should be created.

Text proposal for IR:
"(c) Assessments shall be competency-based."

Text proposal for AMC1 ATCO.D.035 (c):
"
Competency-based assessments should include at least:
(1) Situational awareness — comprehend the current operational situation and anticipate future events;
(2) Traffic and capacity management — ensure a safe, orderly and efficient traffic flow, and provide essential information on environment and potentially hazardous situations;
(3) Separation and conflict resolution — manage potential traffic conflicts and maintain separation;
(4) Communication —communicate effectively in all operational situations;
(5) Coordination — manage coordination between personnel in operational positions and with other affected stakeholders;
(6) Management of non-routine situations — detect and respond to emergency and unusual situations related to aircraft operations and manage degraded modes of ATS operation;
(7) Problem-solving and decision-making — find and implement solutions for identified threats and associated undesired states;
(8) Self-management — demonstrate personal attributes that improve performance and maintain an active involvement in self learning and self-development;
(9) Workload management — use available resources to prioritise and perform tasks in an efficient and timely manner;
(10) Teamwork — collaborate actively to achieve a common goal."

Firstly, this would be in line with the style of other IRs. Secondly, this would ensure harmonization, while as well allowing needed flexibility.

For additional reasoning, see comment 172.

response	Not accepted
	The introduction of competencies at IR level and observable behaviours, conditions and competency standards at AMC level ensures that all holders of a student ATCO licence have demonstrated (as a minimum) a defined, known level of performance to handle complex and dense traffic situations. The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*123*	comment by: *GdF*
	In line with comment 122, we request to change to: "(e) A pass in assessment(s) shall be awarded to an applicant who consistently demonstrates the achievement of required levels of performance for the required competencies defined in AMC1 ATCO.D.035 (c)."	

response	Not accepted
	The introduction of competencies at IR level and observable behaviours, conditions and competency standards at AMC level ensures that all holders of a student ATCO licence have demonstrated (as a minimum) a defined, known level of performance to handle complex and dense traffic situations. The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*130*	comment by: *GdF*
	"The conditions were defined by training experts from EUROCONTROL and the rulemaking group. The traffic levels are based on the figures received from EUROCONTROL. In this statistic the average ACS sector capacity of 230 sectors in Europe was 40 aircraft per hour and the maximum 62. It was considered that for complex and dense traffic situations a slightly higher figure than the average should be used. The calculation is therefore based on 48 aircraft per hour. 80 % of this traffic was considered appropriate for the final assessments as the assessment situation as such creates additional stress and as the assessments also include a non-routine situation. The number was further reduced to take into account the proposed length of the exercise being 45 minutes. This resulted in a minimum of 28 aircraft in a 45-minute exercise. The figures for other ratings were derived in a similar manner." If EASA does not follow comments, asking for more flexibility, this technocratic approach will exclusively have detrimental effects. In contrast to the intentions specified earlier in the document, this "One Size Fits Nobody"-approach will lead to fewer ATCOs. Maybe more student ATCOs, which is the intention of the training	

organisation which do not care about finished ATCOs and seems to have influenced this NPA heavily. But even this seems debatable.

In the absence of the frequently mentioned flexibility, students who are unable to meet the proposed standards would inevitably face failure. However, what if the specific level being mandated is not essential? This is precisely why we refer to this approach as a "One Size Fits Nobody" strategy: the level set is inadequate for high-density areas in Europe, yet excessively demanding for many other locations.

The question arises: what is the benefit of failing a student who possesses the competence to operate efficiently at a low-density airport? Conversely, why would it be advantageous to pass a student who needs to work at a high-traffic hotspot and is likely to struggle in such a challenging environment?

This rigid approach fails to consider the individual capabilities and aptitudes of students, disregarding the potential for a more tailored and effective training outcome.

We are talking about human beings. **People are not a product.**

TL;DR: Do not agree.

response	Noted
	The student ATCO licence is mutually recognisable in all Member States, therefore at least a minimum level of performance must be achieved. An ITO has the flexibility to increase the level of performance if required.

comment	*190*	comment by: *CroControl*
	Change candidate instead of applicant.	
response	Accepted	

comment	*198*	comment by: *Estonian Transport Administration*
	Similar logic hasn't been applied to point ATCO.D.035 (b) and (e) as in in paragraphs (b) and (e) to point ATCO.D.025 where 'an applicant' has been replaced by 'a candidate'.	
response	Accepted	

comment	*248*	comment by: *CANSO*
	ATCO.D.035 (c) (6) Management of non-routine situations — detect and respond to emergency and unusual situations related to aircraft operations and manage degraded modes of ATS operation; Could you clarify the definition of "Management of non-routine situations" as the suggested definition mentions "emergency and unusual situations" but in the conditions for each Rating the non-routine situations that are provided as examples	

cannot be considered to be emergencies or unusual (e.g., IFR missed approach, activation of TSA/TRA, weather change, request for runway change etc.)?

response	Accepted
	The description of this competency has been amended to focus on the impact various situations have on ATC operations. The list of situations to be present in an assessment exercise are intended to provoke an impact on the ATC operation, e.g. while a blocked runway may not be an emergency or unusual situation, it will have a tangible impact on the ATCO managing the operation. The cases provided in AMC ATCO.D.035(c) to (e) will be reviewed and amended, and the term 'conditions' will be changed to 'situations'.

comment	*249*	comment by: *CANSO*
	ATCO.D.035 (c) (7) Problem-solving and decision making — find and implement solutions for identified threats and associated undesired states;	
	Could you provide examples of "identified threats and undesired states"? For example, is a conflict considered to be a problem, threat or an undesired state? Could you provide more examples what is meant here with "problems" and "threats" in addition to what is mentioned in Rating OB 7.4 as these examples are very rare and do not apply to all Ratings?	

response	Accepted
	Guidance material has been added to support this competency.

comment	*250*	comment by: *CANSO*
	ATCO.D.035 (c) (8) Self-management — demonstrate personal attributes that improve performance and maintain an active involvement in self learning and self-development;	
	Could you clarify what are "personal attributes" that are mentioned here?	

response	Accepted
	The observable behaviours for the competency Self-management in AMC1 ATCO.D.035 elaborate on these attributes, e.g. maintains self-control, responsible for own performance, works to improve own performance.

comment	*419*	comment by: *Naviair*
	ATCO.D.035 (c) (6) Management of non-routine situations — detect and respond to emergency and unusual situations related to aircraft operations and manage degradedmodes of ATS operation; Could you clarify the definition of "Management of non-routine situations" as the suggested definition mentions "emergency and unusual situations" but in the conditionsfor each Rating the non-routine situations that are provided as examples cannot be considered to be emergencies or unusual (e.g., IFR missed approach, activation of TSA/TRA, weather change, request for runway change etc.)?	

response	Accepted
	The description of this competency has been amended to focus on the impact various situations have on ATC operations. The list of situations to be present in an assessment exercise are intended to provoke an impact on the ATC operation, e.g. while a blocked runway may not be an emergency or unusual situation, it will have a tangible impact on the ATCO managing the operation. The cases provided in AMC ATCO.D.035(c) to (e) will be reviewed and amended, and the term 'conditions' will be changed to 'situations'.

comment	*420*	comment by: *Naviair*
	ATCO.D.035 (c) (7) Problem-solving and decision making — find and implement solutions for identified threats and associated undesired states;	
	Could you provide examples of "identified threats and undesired states"? For example, isa conflict considered to be a problem, threat or an undesired state? Could you provide more examples what is meant here with "problems" and "threats" in addition to what is mentioned in Rating OB 7.4 as these examples are very rare and do not apply to all Ratings?	
response	Accepted	
	Guidance material will be added to support this competency.	

comment	*421*	comment by: *Naviair*
	ATCO.D.035 (c) (8) Self-management — demonstrate personal attributes that improveperformance and maintain an active involvement in self learning and self-development;	
	Could you clarify what are "personal attributes" that are mentioned here?	
response	Accepted	
	The observable behaviours for the competency Self-management in AMC1 ATCO.D.035 elaborate on these attributes, e.g. maintains self-control, responsible for own performance, works to improve own performance.	

comment	*422*	comment by: *Naviair*
	ATCO.D.035 (e) A pass in assessment(s) shall be awarded to an applicant who consistently demonstrates the achievement of required levels of performance for the required competencies defined in (c) above	
	Could you confirm that if a single assessment is possible on a Rating course, how is therequirement of "multiple observation" as stated in ATCO.D.003 fulfilled and the requirement of "consistently demonstrates" as stated in ATCO.D.035 (e)?	
response	Accepted	
	GM will be added clarifying that a minimum of two consecutive different assessments would satisfy the 'series of observations' requirement.	

comment	*511*	comment by: *Fintraffic Air Navigation Services*

Could you clarify the definition of "Management of non-routine situations" as the suggested definition mentions "emergency and unusual situations" but in the conditions for each Rating the non-routine situations that are provided as examples cannot be considered to be emergencies or unusual (e.g., IFR missed approach, activation of TSA/TRA, weather change, request for runway change etc.)?

response	Accepted

The description of this competency has been amended to focus on the impact various situations have on ATC operations. The list of situations to be present in an assessment exercise are intended to provoke an impact on the ATC operation, e.g. while a blocked runway may not be an emergency or unusual situation, it will have a tangible impact on the ATCO managing the operation. The cases provided in AMC ATCO.D.035(c) to (e) will be reviewed and amended, and the term 'conditions' will be changed to 'situations'.

comment	*512*	comment by: *Fintraffic Air Navigation Services*

Could you provide examples of "identified threats and undesired states"? For example, is a conflict considered to be a problem, threat or an undesired state? Could you provide more examples what is meant here with "problems" and "threats" in addition to what is mentioned in Rating OB 7.4 as these examples are very rare and do not apply to all Ratings?

response	Accepted

Guidance material will be added to support this competency.

comment	*513*	comment by: *Fintraffic Air Navigation Services*

Could you clarify what are "personal attributes" that are mentioned here?

response	Accepted

The observable behaviours for the competency Self-management in AMC1 ATCO.D.035 elaborate on these attributes, e.g. maintains self-control, responsible for own performance, works to improve own performance.

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comment | *514*   comment by: *Fintraffic Air Navigation Services*

Could you clarify what is considered to be a team that is trying "achieve a common goal"? Does this include other sectors, units and stakeholders? Is teamwork considered to be part of coordination so that coordination is the "facts" and teamwork is the "attitude" how the coordination is done? For example on an APP Rating course, the entire rating is done from a single position and all communication with other units and stakeholders can be considered to be coordination. How can the candidate "consistently demonstrate" teamwork in this kind of a scenario especially when most coordination is done using electronic systems?

response | Accepted

GM will be added to elaborate that teamwork may be widely interpreted, with the behaviours being demonstrated in relation to any personnel the candidate interacts with, e.g. adjacent sectors, airport personnel, pilots, etc.

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comment | *522*   comment by: *Fintraffic Air Navigation Services*

Could you confirm that if a single assessment is possible on a Rating course, how is the requirement of "multiple observation" as stated in ATCO.D.003 fulfilled and the requirement of "consistently demonstrates" as stated in ATCO.D.035 (e)?

response | Accepted

GM will be added, clarifying that a minimum of two consecutive different assessments would satisfy the 'series of observations' requirement.

AMC1 ATCO.D.035(c);(e) Rating training examinations and assessment   p. 60

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comment	*124*	comment by: *GdF*

In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training.

It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements?

It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.

response	Noted

The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*275*	comment by: *BCAA*

spelling / lay-out

AMC1 ATCO.D.035
Table headers "competency and definition" and "observable behaviours" are different to the AMC for basic training

response	Noted

comment	*437*	comment by: *IFATCA*

ATC uses three main tools in providing services, clearances, instructions and information. The tables mainly include instructions and clearances.

It would be useful to add "provides information" to "Issues clearances and instructions" where applicable.

response	Accepted

OB 2.9 now includes the issuing of information.

comment	*438*	comment by: *IFATCA*

p.61 ob 3.3.

In "OB 3.3 Applies appropriate separation and spacing" more correct term should be "Establishes" instead of "Applies"

	reword OB 3.3 Establishes appropriate separation and spacing
response	Noted Due to other comments received and a review of all OBs, this OB was revised to 'Applies the selected method appropriately'.

comment	*629*	comment by: *European Transport Workers Federation - ETF*
	Some OB (eg 1.4, 2.9,...) are not always available/simulated. OB 2.1 is not factual.	
response	Noted All OBs have been reviewed and amended where necessary.	

AMC2 ATCO.D.035(c);(e) Rating training examinations and assessment   p. 63

comment	*26*	comment by: *ENAC ACTO Program Director*
	Conditions ADC => For aerodromes that operate predominantly or exclusively VFR, this specification is a burden and should be adapted. The mix of VFR and Special VFR should be considered. (e.g. The density of VFR traffic and the training of specialized controllers on aerodromes receiving VFR traffic are French specificities which justify the number of VFR in our simulations). Moreover, the management of VFR generates greater complexity than that of IFR. DSNA requests from ENAC a training with a high rate of VFR because of its needs and operational capacities. <u>The minimum number of aircraft should take into account the ratio of IFR/VFR and should be lower than 24 if there are more VFRs than IFRs.</u> The point should be changed to read "significant number of IFR" or "mix of IFR and VFR and special VFR flights"	
response	Partially accepted The TRAFFIC conditions were reviewed with the section dealing with flight rules now requiring both IFR and VFR but not mandating the proportion of IFR versus VFR traffic. In addition, the special VFR requirement was relocated to the SITUATIONS condition, meaning that it is one possible option for inclusion in an assessment exercise. The traffic scenarios described in the TRAFFIC condition for the ADC rating are now sufficiently detailed to ensure that a student with an ADC rating is capable of managing both IFR and VFR traffic.	

The number of aircraft movements remains 24 aircraft/45 minutes, however GM was added to explain what constitutes a traffic movement, with, for example, circuit traffic doing a touch and go counting as two aircraft movements.

comment	*125*	comment by: *GdF*

In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training.

It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements?

It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.

response	Noted

The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*161*	comment by: *German NSA (BAF)*

"ADC sector provides aerodrome control service to aerodrome traffic operating within the aerodrome control zone (CTR) with a single instrument runway and a minimum of three taxiways connected to the runway on both sides."

Does the AMC intentionally use the phrase "operating within the aerodrome control zone (CTR)" instead of "operating in the vicinity of the aerodrome"? If yes, why?

Proposal: "a single instrument runway and a minimum of three taxiways connected to the runway in an arrangement that holding positions exist at both ends of the runway"
Rationale: The original sentence may be misinterpreted as requiring three holding positions per RWY end.

response	Accepted

The text has been amended to enable various configurations with the requirement that there is at least a single instrument runway with at least three runway holding positions.

comment	*162*	comment by: *German NSA (BAF)*

Values defined for conditions, e.g.
"With the following traffic levels and complexity (defined for the example CTR of approximate dimensions of 5 nm radius from GND to 2 500 ft.)"
"all levels of traffic with the minimum of 24 aircraft per 45 minutes for the assessed exercise and should ideally not exceed 10 aircraft on frequency simultaneously"

Are the given values with regard to the size of the area of responsibility as well as the number of aircraft per 45 min intended to be scalable? I.e. if duration of an ADC assessment is set at 90 min the number of aircraft increases to 48? If the APP airspace is only 30 nm x 30 nm the number of aircraft on the frequency should not exceed 2?

response	Noted

Assessment exercises are indicated as a minimum of 45 minutes in duration. The minimum traffic levels are predicated on this duration. It was considered that all traffic scenarios could be managed, and the required observable behaviours demonstrated during this time period. An ITO who wishes to prolong the duration of the exercise would need to increase the number of aircraft proportionally. A method for doing this has not been included as there are multiple variables that could affect how this increase is achieved (e.g. in relation to the additional conflicts and/or actions that the extra aircraft introduce, in relation to the exercise already being above the minimum traffic levels). ITOs would need to demonstrate to the competent authority how they determined the increased traffic level because of the increase in assessment exercise duration.

comment	*200*	comment by: *Estonian Transport Administration*

Proposed text reads (description for Simulated aerodrome control services environment (minimum of 180° aerodrome simulator)): '*ADC sector provides aerodrome control service to aerodrome traffic operating within the aerodrome control zone (CTR) with a single instrument runway and a minimum of three taxiways connected to the runway on both sides.*'
We would appreciate a clarification what EASA meant by ' a single instrument runway'.
Furthermore, is that a reference to one physical runway with two opposite directions where three (3) taxiways are e.g. on oneside of the physical runway and three (3) taxiway on the other side of the physical runway, meaning there has to be six (6) separate tawiways?

response	Accepted

The text will be amended to enable various configurations with the requirement that there is at least a single instrument runway with at least three runway holding positions.

comment	*202*	comment by: *DFS Deutsche Flugsicherung GmbH*

AMC2 ATCO.D.035(c);(e)

These very detailed described conditions (only these courses are taught within the DFS at the moment), would have a high time-consuming effect on our staff.

All our exercises must be adapted (none of the conditions are close to the simulation environment within the DFS), which requires a change to all exercises in regard of the basic setting (size, upper/lower level, nr. of RWYs) and thereafter an adaptation of every single exercise in regard of starting point of the acft, rewriting of every single pilot regie in regard of initial contact times or requests for level change and change of all our regies for the external borders that are written to train the surrounding airspaces. Every single planned conflict or problem in the actual exercises must thereafter be revalidated to confirm that it still exists and that the exercise has the planned outcome for the student. For these tasks we need time, staff and therefore a lot of money.

response	Noted

All conditions have been reviewed. The example airspace has been removed. The text has been modified to clarify that the conditions are a minimum and that more is possible. The simulated environment now contains a list of minimum elements that must be present and a set of traffic scenarios that must occur during assessment exercises. These amendments enable a large degree of flexibility in both the airspace and the exercise design.

comment	*231*	comment by: *CANSO*

Conditions ADC => For aerodromes that operate predominantly or exclusively VFR, this specification is a burden and should be adapted. The mix of VFR and Special VFR should be considered. (e.g. The density of VFR traffic and the training of specialized controllers on aerodromes receiving VFR traffic are French specificities which justify the number of VFR in our simulations). Moreover, the management of VFR generates greater complexity than that of IFR. DSNA requests from ENAC a training with ahigh rate of VFR because of its needs and operational capacities.

The minimum number of aircraft should take into account the ratio of IFR/VFR and should be lower than 24 if there are more VFRs than IFRs.

The point should be changed to read "significant number of IFR" or "mix of IFR and VFR and special VFR flights"

response	Partially accepted

The TRAFFIC conditions were reviewed with the section dealing with flight rules now requiring both IFR and VFR but not mandating the proportion of IFR versus VFR traffic. In addition, the special VFR requirement was relocated to the SITUATIONS condition, meaning that it is one possible option for inclusion in an assessment exercise.

The traffic scenarios described in the TRAFFIC condition for the ADC rating are now sufficiently detailed to ensure that a student with an ADC rating is capable of managing both IFR and VFR traffic.

The number of aircraft movements remains 24 aircraft/45 minutes, however GM was added to explain what constitutes a traffic movement, with, for example, circuit traffic doing a touch and go counting as two aircraft movements.

comment	*336*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Conditions ADC => For aerodromes that operate predominantly or exclusively VFR, this specification is a burden and should be adapted. The mix of VFR and others trafic should be considered. (e.g. The density of VFR traffic and the training of specialized controllers on aerodromes receiving VFR traffic are French specificities which justify the number of VFR in our simulations). Moreover, the management of VFR generates greater complexity than that of IFR.

French civil ANSP (i.e. DSNA) requests from french civil school (i.e. ENAC) a training with a high rate of VFR because of its needs and operational capacities.

The minimum number of aircraft should take into account the ratio of IFR/VFR and should be lower than 24 if there are more VFRs than IFRs.

The point should be changed to read "significant number of IFR" or "mix of IFR and VFR and special VFR flights".

response | Partially accepted

The TRAFFIC conditions were reviewed with the section dealing with flight rules now requiring both IFR and VFR but not mandating the proportion of IFR versus VFR traffic. In addition, the special VFR requirement was relocated to the SITUATIONS condition, meaning that it is one possible option for inclusion in an assessment exercise.

The traffic scenarios described in the TRAFFIC condition for the ADC rating are now sufficiently detailed to ensure that a student with an ADC rating is capable of managing both IFR and VFR traffic.

The number of aircraft movements remains 24 aircraft/45 minutes, however GM was added to explain what constitutes a traffic movement, with, for example, circuit traffic doing a touch and go counting as two aircraft movements.

comment	*381*	comment by: *FABEC TTF*

For aerodromes that operate predominantly or exclusively VFR, this specification is a burden and should be adapted. The mix of VFR and Special VFR should be considered (e.g., the density of VFR traffic and the training of specialized controllers on aerodromes receiving VFR traffic are French specificities which justify the number of VFR in our simulations. Moreover, the management of VFR generates greater complexity than that of IFR. DSNA request from ENAC a training with a high rate of VFR because it needs and operational capacities). The point should be changed to read "significant number of IFR" or "mix of IFR and VFR and special VFR flights".

response | Partially accepted

The TRAFFIC conditions were reviewed with the section dealing with flight rules now requiring both IFR and VFR but not mandating the proportion of IFR versus VFR traffic. In addition, the special VFR requirement was relocated to the SITUATIONS condition, meaning that it is one possible option for inclusion in an assessment exercise.

The traffic scenarios described in the TRAFFIC condition for the ADC rating are now sufficiently detailed to ensure that a student with an ADC rating is capable of managing both IFR and VFR traffic.

The number of aircraft movements remains 24 aircraft/45 minutes, however GM was added to explain what constitutes a traffic movement, with, for example, circuit traffic doing a touch and go counting as two aircraft movements.

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comment | **423** | comment by: *Naviair*

Conditions ADC => For aerodromes that operate predominantly or exclusively VFR, this specification is a burden and should be adapted. The mix of VFR and Special VFR should be considered. (e.g. The density of VFR traffic and the training of specialized controllers on aerodromes receiving VFR traffic are French specificities which justify the number of VFR in our simulations). Moreover, the management of VFR generates greater complexitythan that of IFR. DSNA requests from ENAC a training with ahigh rate of VFR because of its needs and operational capacities.

The minimum number of aircraft should take into account the ratio of IFR/VFR and should be lower than 24 if there are more VFRs than IFRs.

The point should be changed to read "significant number of IFR" or "mix of IFR and VFRand special VFR flights"

Table "Conditions APS"
"The approach sector should be notified as Class C airspace. The airspace below the CTA sectoroutside (around) CTR is classified as uncontrolled G airspace."

In order to prevent that students will be trained for a situation that will never occur, we suggest torephrase:
The airspace below ... is classified as airspace, **in which VFR traffic is allowed to fly without airtraffic control clearance.**

This would allow the TO to inform the student that in the end the airspace classes are determined bythe Member States and that sectors outside Class C may vary in classification. And it does not affectthe approach sector training itself.

response | Partially accepted

The TRAFFIC conditions were reviewed with the section dealing with flight rules now requiring both IFR and VFR but not mandating the proportion of IFR versus VFR traffic. In addition, the special VFR requirement was relocated to the SITUATIONS condition, meaning that it is one possible option for inclusion in an assessment exercise.

The traffic scenarios described in the TRAFFIC condition for the ADC rating are now sufficiently detailed to ensure that a student with an ADC rating is capable of managing both IFR and VFR traffic.

The number of aircraft movements remains 24 aircraft/45 minutes, however GM was added to explain what constitutes a traffic movement, with, for example, circuit traffic doing a touch and go counting as two aircraft movements.

| comment | *476* | comment by: *Air Traffic Control the Netherlands* |

Regarding the text *"Simulated aerodrome control services environment (minimum of 180 degrees aerodrome simulator):*
It is unclear whether it is still allowed to train for ADC rating on a simulator with less than 180-degree field of view. LVNL strongly recommends maintaining the option to utilize simulators with less than 180-degree field of view for training purposes within the ADC rating. A simulator fidelity should align with the specific phase and objectives of the ATCO training. The deployment of different types of simulators, in this case training on a non-180-degree simulator and assessment on a simulator with a minimum of 180-degree, gives the ATCO training flexibility and efficiency.

| response | Accepted |

The 180° field of view has been changed to require the student to be able to view the movement area and the aerodrome traffic.

| comment | *523* | comment by: *Fintraffic Air Navigation Services* |

We recognize that this is an important behaviour for an ATCO but question its relevance on Rating training where each simulation is planned and students briefed. This is also not a mandated situation in an assessed exercise according to the conditions for different ratings.

| response | Not accepted |

All OBs have been reviewed. This OB is considered as a significant behaviour to demonstrate that the candidate is able to maintain situational awareness through meteorological monitoring. In instances where systems are limited, it is sufficient for the candidate to have read the METARs and/or SIGMETs for nearby aerodromes and airspaces. Nonetheless, the wording has been modified to make clearer what should be monitored.

| comment | *524* | comment by: *Fintraffic Air Navigation Services* |

We recognize that this is an important behaviour for an ATCO but question its relevance on Rating training where each simulation is planned and students

briefed. This is not a mandated situation in an assessed exercise according to the conditions for different ratings.

response | Not accepted

All OBS have been reviewed. Monitoring systems and equipment is a core part of the ATC function and maintaining situational awareness. In some instances, the amount of equipment may be limited.

comment | *525*   comment by: *Fintraffic Air Navigation Services*

Could you clarify how this differs from the "nearby airspace" in "OB 1.1 Monitors air traffic in own area of responsibility and nearby airspace"? We would suggest deleting this as it is covered with OB 1.1.

response | Accepted

comment | *526*   comment by: *Fintraffic Air Navigation Services*

We would suggest a simpler and more concise wording such as "Acquires information from available sources". This could be clarified with information in parenthesis if needed such as "Acquires information from available sources (e.g., surveillance and flight data systems, meteorological data, electronic data displays)". Using simpler and more concise wording would make it easier to remember and to use especially when using electronic forms with different devices.

response | Accepted

Specific sources of information have been now indicated as examples.

comment | *527*   comment by: *Fintraffic Air Navigation Services*

Can you provide examples in how an instructor can observe this? In an assessed exercise where the student is supposed to handle traffic without any prompts

from the instructor, how can this be observed except by asking questions after the exercise? We would suggest deleting this.

response | Not accepted

This OB is observed through the subsequent actions of the student. An essential behaviour that is typically only considered when the performance of the student is not optimal.

comment | *528* | comment by: *Fintraffic Air Navigation Services*

Could you provide more examples of what are considered to be threats? We suggest deleting this as the only threat mentioned here that is mandatory in an assessed exercise is "high traffic volumes". We recognize that this is an important behaviour for an ATCO but question its relevance on Rating training. In the simulator, the trainee has been briefed on what the subject of the simulation is so there rarely are situations that are surprises and should be identified.

response | Partially accepted

Threat and error management are activities that ATCOs undertake on a regular basis. The text has been modified to include errors. The examples have been removed and GM is provided to assist in the understanding of this concept.

comment | *529* | comment by: *Fintraffic Air Navigation Services*

Could you clarify if this includes the ICAO OB 4.11 Verifies accuracy of system inputs and corrects as necessary? If not, then a separate OB would be necessary as it is vital to observe that strip markings, label updates etc. are correct.

response | Noted

Yes, this OB may be used to ensure that the strip marking, etc. is correct.

comment	**530**	comment by: *Fintraffic Air Navigation Services*
	We would suggest leaving out "relevant to the rating" as it is self-evident.	
response	Accepted	

comment	**531**	comment by: *Fintraffic Air Navigation Services*
	We would suggest making this more simple such as "Issues appropriate clearances and instructions". The items now mentioned can be considered to be "appropriate" and could be included inside parenthesis for clarification if necessary.	
response	Not accepted This OB is specifically focused on the situations described to distinguish them from similar OBs 3.4 and 3.5. Nonetheless, a review of all OBs was conducted and 'terrain obstacles' was removed as this would not be possible for some ACS and ACP contexts.	

comment	**532**	comment by: *Fintraffic Air Navigation Services*
	We would suggest making this simpler and more relevant to all ratings by changing it to e.g., "Issues necessary information in a relevant, accurate and timely manner". The items now mentioned are not mandatory in an assessed exercise according to the conditions for each Rating.	
response	Accepted The details of what type of information is necessary is moved to examples.	

comment	**533**	comment by: *Fintraffic Air Navigation Services*
	Could you clarify what are "hazard alerts" and "safety alerts" as we cannot find a clear definition for these? Could you also clarify what "safety alerts" are relevant to ADC, APP and ACP Rating where ATS Surveillance system is not available? We	

suggest deleting this kind of a situation is not mandatory in assessed exercise according to the conditions for each Rating.

response	Partially accepted
	The text has been amended to refer to 'potential hazardous situations' with examples provided.

comment	*534*	comment by: *Fintraffic Air Navigation Services*
	Could you clarify what is considered to be "proximity"? Is it when aircraft are closer to each other than prescribed minima? What is there is no defined minima, like VFR – VFR in Class C airspace? For example on an APS course in Class C airspace, what is considered "proximity"?	

response	Accepted
	The OB has been deleted, with 'traffic information' now added to the list of examples in OB2.8.

comment	*535*	comment by: *Fintraffic Air Navigation Services*
	What is the difference between this and OB 2.1 Identifies situations that have the potential to become unsafe? We suggest deleting this as OB 2.1 also covers traffic conflicts.	

response	Not accepted
	This OB is retained as it is located in the Separation & conflict resolution competency that requires the achievement of the highest competency standard.

comment	*536*	comment by: *Fintraffic Air Navigation Services*

Could you clarify what is meant with "appropriate" in OB 3.2? If this means that when you apply lateral instead of vertical separation and vertical would be the preferred option then can the student be not competent"? We would suggest combining OB 3.2, 3.3, 3.4, 3.5 and 3.7 into a single OB "Issues clearances and instructions that ensure appropriate separation and spacing is maintained". If you apply appropriate separation, you have then selected the correct separation method. We think that it is so rare that you would only select the appropriate method but not apply it. Also if you issue an instruction that ensures separation, then you have selected and applied it. At present, OB 3.3 only covers separation whereas OB 3.3 covers both separation and spacing. If you give instruction that ensure separation is maintained, then at the same time you resolve conflicts. It is not possible to resolve conflicts without ensuring separation and spacing is maintained. OB 3.7 Adjusting is just applying OB 3.5 again. No need for a separate item.

response	Partially accepted

OB 3.2 'Appropriate' to achieve the objective, e.g. if a student chooses vertical separation over vectoring and as a result they cannot meet the exit conditions for the sector, then they did not use an appropriate separation method. Appropriate can also be supported through an evidence guide, i.e. what appropriate means in a specific airspace.
OB 3.3. The text has been amended to clarify that the student should demonstrate that they are able to apply the selected method appropriately.

comment	*537*	comment by: *Fintraffic Air Navigation Services*

We would suggest deleting this as "OB 1.1 Monitors air traffic in own area of responsibility and nearby airspace" covers this.

response	Not accepted

This OB is retained as it is located in the Separation & conflict resolution competency that requires the achievement of the highest competency standard.

comment	*538*	comment by: *Fintraffic Air Navigation Services*

> We would suggest a simpler and broader phrase "Resolves conflicts through coordination". This would also include positions within the same sector, for example EC and PLC working in the same sector or TWR and GND.

response | Accepted

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comment | *539* comment by: *Fintraffic Air Navigation Services*

> We would question the relevance of this regarding Rating training suggest deleting it. When communicating with the pilots, e.g., on ADC, APS, APP courses, the student has no other way of communicating with the pilots except radio. On ACS courses we do not use CPDLC, so again radio is the only option. When communicating with other sectors, this would fall under coordination.

response | Not accepted

When only one mode of communication exists, then this is the mode that is selected.

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comment | *540* comment by: *Fintraffic Air Navigation Services*

> Could you clarify what is meant with "simple language" and how does it differ from OB 4.2 Speaks clearly, accurately, concisely and OB 4.3 Uses standard radiotelephony phraseology, when prescribed?

response | Accepted

'Simple language' is deleted.

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comment | *541* comment by: *Fintraffic Air Navigation Services*

> Could you clarity to whom should the student "communicate relevant concerns and intentions" and how does this differ from coordination? How is this relevant e.g. in APP course where the entire course is done from a single working position?

response	Accepted
	This OB is removed.

comment	*542*	comment by: *Fintraffic Air Navigation Services*
	We would suggest a simpler phrase such as "Coordinates in a timely manner". The current suggested phrase can be interpreted not to include other units as these are not explicitly mentioned which probably is not the intention.	
response	Accepted	

comment	*543*	comment by: *Fintraffic Air Navigation Services*
	We would suggest combining this with OB 5.4 and make it broader and simpler such as "Coordinates using appropriate prescribed procedures". Also it is very rare that on a Rating course the student is able to select the mode in which the coordination is done.	
response	Accepted	
	This OB is removed as it was considered that OB4.1 already covers this behaviour.	

comment	*544*	comment by: *Fintraffic Air Navigation Services*
	We suggest combining this with OB 5.3 and making it simpler.	
response	Partially accepted	
	This OB is retained but the text is made simpler.	

comment	**545**	comment by: *Fintraffic Air Navigation Services*

We suggest deleting this as it would be covered by our suggestion to rename OB 5.2 to "Coordinates in a timely manner".

response	Not accepted

This OB is focused on what is to be coordinated, not on whether it is timely.

comment	**546**	comment by: *Fintraffic Air Navigation Services*

Could you provide examples of this? If this means messages sent via electronic systems, then this is obsolete and we suggest deleting this as the student is not able to affect what kind of electronic messages the systems send.

response	Accepted

This OB has been removed as it is considered to be already included in OB4.1 and OB5.4.

comment	**547**	comment by: *Fintraffic Air Navigation Services*

Could you clarify if this mean that the assessed simulation(s) has to have a position handover? At the moment, this is not a requirement in the conditions for each Rating.

response	Noted

Yes, a handover is included.

comment	**548**	comment by: *Fintraffic Air Navigation Services*

	Definition here should be with a hyphen as it is in ATCO.D.035 (c)(6)
response	Accepted

comment	549	comment by: *Fintraffic Air Navigation Services*
	We would suggest omitting "from the information available" as self-evident.	
response	Accepted	

comment	550	comment by: *Fintraffic Air Navigation Services*
	We question the relevance of this in rating training where each simulation is planned beforehand so there shouldn't be ambiguity situations. We would suggest changing this to a broader phrase such as "Verifies the nature of the situation where ambiguity exists". This would cover situations which are not emergencies but could be considered to be non-routine situations (e.g. missed approaches). A Rating course does not have so many emergencies that a separate observable behaviour would be necessary.	
response	Partially accepted The text has been modified to include abnormal situations as an alternative to emergencies.	

comment	551	comment by: *Fintraffic Air Navigation Services*
	We suggest deleting this as "OB 7.3 Organizes tasks in an appropriate order of priorities" is relevant to all situations, not just non-routine situations.	
response	Accepted	

comment	552	comment by: *Fintraffic Air Navigation Services*

We suggest changing this to "Provides appropriate assistance" as there can be situations where it can be argued which is the most appropriate assistance and we find it too strict to evaluate the student as not competent is appropriate assistance is provide but it is not the most appropriate.

response	Accepted

comment	*553*	comment by: *Fintraffic Air Navigation Services*

We question the relevance of these in Rating training where the objective for each simulation is defined so the student knows in many cases where degradation of equipment or systems is trained. Could you also clarify if these require a degradation to be in the assessed simulation(s) as it is an option in the conditions for each Rating at the moment? We also suggest changing deleting the "and" from OB 6.5. If these are kept then we would suggest combining these into a single OB "Uses prescribed procedures for degraded mode of operation". If you use prescribed procedures for degraded mode of operation, the you have identified the degradation and you have assessed the impact.

response	Accepted These OBs have been removed.

comment	*554*	comment by: *Fintraffic Air Navigation Services*

We suggest combining this with OB 6.3 Prioritises actions based on the urgency of the situation.

response	Partially accepted The text has been modified to focus the behaviour on prioritising actions.

comment	*555*	comment by: *Fintraffic Air Navigation Services*

Could you clarify what is meant with "feedback" in this instance and to whom the student is supposed to provide feedback?

response | Accepted

Deleted. This is a behaviour that is more suitable for training, not assessment. When a student is undertaking an assessment, they are usually at the point where this is not necessary.

comment | *556* comment by: *Fintraffic Air Navigation Services*

Could you clarify what is meant with feedback in this instance?

response | Partially accepted

Feedback could be from any actor, e.g. planner, pseudo-pilot, pseudo adjacent sector. Nonetheless, the text has been modified to make this OB only applicable in instances whether this type of feedback is provided.

comment | *557* comment by: *Fintraffic Air Navigation Services*

We question the relevance of this to all ratings. For example in ADC and APP course, how can a student delegate tasks when there are no colleagues available? We would prefer changing this to ICAO OB 9.4 Asks for help, when necessary or a similar "asks for assistance, when necessary", which could be on an APP course asking ACC to help on a situation but this cannot be considered to be delegating.

response | Partially accepted

The text has been modified to ensure that these OBs need only be observed when the context demands it.

comment | *558* comment by: *Fintraffic Air Navigation Services*

Could you clarify how this fit into the overall picture as at the moment there is no OB for "ask for help" or "asks for assistance". Delegation and assistance are not the same thing. We would suggest deleting this because if OB 9.3 would be changed to "Asks for help", then that would be enough.

response	Partially accepted

The text has been modified to clarify that this assistance may only occur in certain contexts and that it is focused on reducing workload.

comment	*559*	comment by: *Fintraffic Air Navigation Services*

Could you clarify what kind of features are meant here as we think that our simulator system does not have such capabilities. Does this mean that an AltMOC is automatically necessary? If "when available" is meant to cover training organisations that do not have such capabilities, then we would suggest deleting this as it is not relevant to all Ratings, e.g., APP rating.

response	Accepted

The text has been modified to clarify that the ATS equipment is that which is available to perform the required tasks.

comment	*560*	comment by: *Fintraffic Air Navigation Services*

Could you clarify what is meant with feedback here and to whom the trainee is supposed to give feedback? How is this relevant in e.g., ADC, APP or APS rating where a single controller position is used?

response	Accepted

This OB is removed.

| comment | **561** | comment by: *Fintraffic Air Navigation Services* |

Could you clarify how is this relevant in e.g., ADC, APP or APS rating where a single controller position is used?

| response | Noted |

GM has been added to clarify that 'teams' in this OB should be considered in the widest sense, e.g. people the student coordinates with, pilots, etc.

| comment | **562** | comment by: *Fintraffic Air Navigation Services* |

Could you clarify why both instructor and assessor are mentioned and does this mean that an assessor is not required for the assessment at the end of the training?

| response | Accepted |

Instructor deleted.

| comment | **563** | comment by: *Fintraffic Air Navigation Services* |

Could you clarify that because a single assessment can be done, is the intention that the same simulation has both VFR and SVFR traffic and VMC and IMC? In this instance, does VMC/IMC mean that in the single exercise, the weather should be both above VMC minima (ground visibility at least 5km, ceiling at least 1500ft) and below VMC minima?

| response | Noted |

Special VFR has been moved to the SITUATIONS condition, meaning that it is optional for an assessment exercise.
GM has been added to suggest that a minimum of two assessment exercises should be undertaken.

comment	*564*	comment by: *Fintraffic Air Navigation Services*

Could you clarify if "light training aircraft" means VFR or IFR or either?

response	Noted

It could be either. The text has been modified to removed 'light'.

comment	*565*	comment by: *Fintraffic Air Navigation Services*

Could you clarify whether this means that there are 24 aircraft calling during the exercise or that there are 24 total operations (take-offs landings and transits) that are handled e.g., from initial call to transfer of control?

response	Noted

GM has been added that details what constitutes a 'traffic movement' for the purposes of this count.

comment	*566*	comment by: *Fintraffic Air Navigation Services*

We would suggest defining if the vehicle traffic is supposed to cross the active runway, do a runway inspection etc.

response	Accepted

Vehicles entering or crossing the runway in use is added to the traffic scenarios required in an assessment exercise.

comment	*567*	comment by: *Fintraffic Air Navigation Services*

Could you clarify why "aircraft inbound to the aerodrome" is mentioned but not outbound?

response | Accepted

This section was reviewed and the requirement to have a situation display was removed.

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comment | *568* | comment by: *Fintraffic Air Navigation Services*

We suggest renaming this the same way as conditions for APP "With the use of at least the following tools and equipment"?

response | Accepted

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comment | *569* | comment by: *Fintraffic Air Navigation Services*

Could you clarify why both instructor and assessor are mentioned and does this mean that an assessor is not required for the assessment at the end of the training?

response | Accepted

Instructor deleted.

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comment | *570* | comment by: *Fintraffic Air Navigation Services*

We suggest adding a possibility to call the airspace also as TMA as all the airspaces in Finland where APP's operate are called TMA's and we would like the simulated airsapce to be as close to the operational as feasible.

response | Accepted

comment | *571* | comment by: *Fintraffic Air Navigation Services*

Is combined TWR/APP operation allowed as all of our APP courses are done as combined TWR/APP operation? We would like to continue this way as combined operation is done in the operational units as well in Finland.

response | Noted

ATCO.D.020 (c) remains applicable.

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comment | *572* | comment by: *Fintraffic Air Navigation Services*

Does this mean traffic that have called on frequency or traffic that the trainee has dealt with from start to finish e.g. from initial contact until transfer to the next frequency?

response | Noted

This means traffic that has been managed by the student at some point during the assessment exercise. Some traffic may already be present at the start of the assessment exercise, some may establish contact at a later point during the exercise. By the end of the exercise, some aircraft are likely to still be in the airspace.

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comment | *573* | comment by: *Fintraffic Air Navigation Services*

We find the inclusion of different wake categories as irrelevant as our current APP course procedures make wake category irrelevant as the time-based separation minimas are equal or greater than wake turbulence minimas. This applies to operational units as well.

response | Noted

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comment | *574* | comment by: *Fintraffic Air Navigation Services*

Can you clarify if this is just a request that can be denied? If this is the case then we suggest deleting this as we don't see it as a "non-routine" situation.

response	Accepted
	The text has been modified to clarify that a runway is intended.

comment	*575*	comment by: *Fintraffic Air Navigation Services*
	Could you clarify why both instructor and assessor are mentioned and does this mean that an assessor is not required for the assessment at the end of the training?	
response	Accepted	
	Instructor deleted.	

comment	*576*	comment by: *Fintraffic Air Navigation Services*
	We suggest adding a possibility to call the airspace also as TMA as all the airspaces in Finland where APP's operate are called TMA's and we would like the simulated airsapce to be as close to the operational as feasible.	
response	Accepted	

comment	*577*	comment by: *Fintraffic Air Navigation Services*
	We suggest adding also Class D as our APS courses are done in Class D airspace and many of the APP's in Finland operate in Class D airspace.	
response	Accepted	

comment	*578*	comment by: *Fintraffic Air Navigation Services*

> Could you clarify why both instructor and assessor are mentioned and does this mean that an assessor is not required for the assessment at the end of the training?

response Accepted

Instructor deleted.

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comment *579*   comment by: *Fintraffic Air Navigation Services*

> We suggest removing "above FL195 the sector could be notified as Class A airspace" as all airspace above FL195 in Finland is Class C and we would like the simulated airspace to be as close to operational as feasible.

response Accepted

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comment *580*   comment by: *Fintraffic Air Navigation Services*

> Could you clarify what is meant with "joining VFRs"?

response Noted

This was intended to mean arriving VFRs. The text has been modified to separate flight rules from flight profiles, so 'joining VFRs' has been removed.

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comment *581*   comment by: *Fintraffic Air Navigation Services*

> Could you clarify what is meant with "light training aircraft" in this context?

response Accepted

The word 'training' has been removed.

| comment | 582 | comment by: *Fintraffic Air Navigation Services* |

Could you clarify if all observable behaviours are equal? For example if a student does not "respond objectively to both positive and negative feedback" (Rating OB 10.2) but everything else can be observed to be at the required level, the student cannot be considered to be competent and this has the same value as if the student e.g. does not "use prescribed procedures" (Rating OB 2.3) but he/she can be observed to be competent in everything else?

| response | Noted |

A competency standard has been added to AMC1 ATCO.D.035 (c); (e) which clarifies the 'weighting' of the competencies.

| comment | 630 | comment by: *European Transport Workers Federation - ETF* |

Why does the CTR needs to be class D or C ?
This is far too prescriptive and will trigger AltMOCs therefore failing to reach justifications for these proposed changes.

| response | Accepted |

The text has been modified to enable a different airspace classification.

| comment | 631 | comment by: *European Transport Workers Federation - ETF* |

The levels of traffic are not found in all units under these conditions. Why should such standard be met when not in line with actual trafic thereafter ?

This appears to be more of a selection criteria for fitness for employment in given employer rather than a measure put in place to ensure relevant competence for actual traffic. It may also be achieved by students with more time available for training....

The lack of consensus within RMG is not stated : not fair at all.

| response | Not accepted |

European student ATCO licences are mutually recognisable. The conditions define a minimum harmonised level of performance.

| **AMC3 ATCO.D.035(c);(e) Rating training examinations and assessment** | p. 64 |

| comment | *126* | comment by: *GdF* |

In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training.

It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements?

It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.

| response | Noted |

The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

| comment | *439* | comment by: *IFATCA* |

With the following traffic levels and complexity (defined for the example CTR of approximate dimensions of 5 nm radius from GND to 2 500 ft.)

change

GND to 2 500 ft. AGL

| response | Noted |

The conditions were reviewed, including the example airspace dimensions. Consequently, the example airspaces were deleted and replaced with a description of what elements should be present in the simulated environment.

| comment | *631* ❖ | comment by: *European Transport Workers Federation - ETF* |

The levels of traffic are not found in all units under these conditions. Why should such standard be met when not in line with actual trafic thereafter ?

This appears to be more of a selection criteria for fitness for employment in given employer rather than a measure put in place to ensure relevant competence for actual traffic. It may also be achieved by students with more time available for training....

The lack of consensus within RMG is not stated : not fair at all.

response	Not accepted
	European student ATCO licences are mutually recognisable. The conditions define a minimum harmonised level of performance.

AMC4 ATCO.D.035(c);(e) Rating training examinations and assessment	p. 66

comment	*127*	comment by: *GdF*

In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training.

It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements?

It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.

response	Noted
	The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*440*	comment by: *IFATCA*

Simulated approach procedural control services environment

Terminal control area TMA should be added for clarity to approach control area (CTA)

response	Noted
	The conditions for each rating were reviewed. The minimum elements to be included in the simulated environment have been defined without specifying that there must be an approach control area.

comment	*441*	comment by: *IFATCA*

RNAV departures and arrivals and RNP approaches are not covered. Mixed conventional and RNAV/PBN operations should be covered.

Add specifications to SID, STAR and final approach including conventional /RNAV and VOR, ILS, RNP approaches

response | Partially accepted

Conditions were reviewed. The simulated environment now contains a requirement to include precision and non-precision approach procedures. ITOs may determine which precision approach procedures to include taking into account the traffic scenarios that need to be generated in the 'TRAFFIC' condition.

comment | *631* ❖   comment by: *European Transport Workers Federation - ETF*

The levels of traffic are not found in all units under these conditions. Why should such standard be met when not in line with actual trafic thereafter ?

This appears to be more of a selection criteria for fitness for employment in given employer rather than a measure put in place to ensure relevant competence for actual traffic. It may also be achieved by students with more time available for training....

The lack of consensus within RMG is not stated : not fair at all.

response | Not accepted

European student ATCO licences are mutually recognisable. The conditions define a minimum harmonised level of performance.

AMC5 ATCO.D.035(c);(e) Rating training examinations and assessment   p. 67

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comment | *10*   comment by: *DFS Deutsche Flugsicherung GmbH*

Table "Conditions APS"
"The approach sector should be notified as Class C airspace. The airspace below the CTA sector outside (around) CTR is classified as uncontrolled G airspace."

In order to prevent that students will be trained for a situation that will never occur, we suggest to rephrase:
The airspace below ... is classified as airspace, **in which VFR traffic is allowed to fly without air traffic control clearance.**

This would allow the TO to inform the student that in the end the airspace classes are determined by the Member States and that sectors outside Class C may vary in classification. And it does not affect the approach sector training itself.

response | Accepted

The description of the simulated environment now requires that a portion of 'uncontrolled airspace' adjacent to the APS sector is present. The ITO determines the classification of this uncontrolled airspace.

comment	*128*	comment by: *GdF*

In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability.

As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training.

It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements?

It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.

response	Not accepted

The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*163*	comment by: *German NSA (BAF)*

"There should be at least one major airport (CTR) below the approach sector"

Question: Is a definition of the complexity of the airport intentionally omitted? I.e. the training organisation may define whether crossing and/or parallel runways with instrument procedures exist?

response	Accepted

The conditions for APS were reviewed. A minimum set of elements to be present in the simulated environment were defined, including precision and non-precision approach procedures. In addition, a list of traffic scenarios that must be present in the assessment exercises were defined. With these conditions specified, the need to define the complexity of the airport is no longer necessary and the ITO can determine the runway configuration and approach procedures.

comment	*205*	comment by: *DFS Deutsche Flugsicherung GmbH*

AMC5 ATCO.D.035(c);(e)

These very detailed described conditions (only these courses are taught within the DFS at the moment), would have a high time-consuming effect on our staff.
All our exercises must be adapted (none of the conditions are close to the simulation environment within the DFS), which requires a change to all exercises in regard of the basic setting (size, upper/lower level, nr. of RWYs) and thereafter an adaptation

of every single exercise in regard of starting point of the acft, rewriting of every single pilot regie in regard of initial contact times or requests for level change and change of all our regies for the external borders that are written to train the surrounding airspaces. Every single planned conflict or problem in the actual exercises must thereafter be revalidated to confirm that it still exists and that the exercise has the planned outcome for the student. For these tasks we need time, staff and therefore a lot of money.

response	Noted
	All conditions have been reviewed. The example airspace has been removed. The text has been modified to clarify that the conditions are a minimum and that more is possible. The simulated environment now contains a list of minimum elements that must be present and a set of traffic scenarios that must occur during assessment exercises. These amendments enable a large degree of flexibility in both the airspace and the exercise design.

comment	*227*	comment by: *CANSO*
	Table "Conditions APS" "The approach sector should be notified as Class C airspace. The airspace below the CTA sector outside (around) CTR is classified as uncontrolled G airspace."	
	In order to prevent that students will be trained for a situation that will never occur, we suggest to rephrase: The airspace below ... is classified as airspace, **in which VFR traffic is allowed to fly without air traffic control clearance.**	
	This would allow the TO to inform the student that in the end the airspace classes are determined by the Member States and that sectors outside Class C may vary in classification. And it does not affect the approach sector training itself.	

response	Accepted
	The description of the simulated environment now requires that a portion of 'uncontrolled airspace' adjacent to the APS sector is present. The ITO determines the classification of this uncontrolled airspace.

comment	*360*	comment by: *TO Austro Control*
	Various Tables ("Conditions ADC, APS, ACS")	
	Why so detailed? Detailed prescription should be left to the Member States,	
	<u>Status quo:</u> Contains a lot of "wordings" which are not suitable for Austria (e.g. use of ATS-routes, airways, Airspace A,.....) **It should be clearly stated that these various tables are examples and have to be defined by the member state or a common airspace and a common set of exercises shall be designed**	

A definition of traffic level (eg. 28 A/C during 45min for ACS) without a comprehensive definition of airspace and traffic flows is no harmonization of complexity.

response | Partially accepted

The example airspaces and references to ATS routes have been removed. While the traffic levels remain, the TRAFFIC condition now details the traffic scenarios that are to be present in the assessment exercises.
More flexibility in relation to airspace classification is now possible with some airspaces being described only as 'uncontrolled', while for controlled airspaces more flexibility has been enabled for most ratings.

comment | *442* | comment by: *IFATCA*

Military jets differ a lot one from another. They could be fighter jets or other jet aircraft. More generic term as "other aircraft (military transport or fighter aircraft, police, firefighting, medical etc.)" could be used instead

response | Noted

To enable a degree of flexibility for training and assessment design, the generic term is retained.

comment | *477* | comment by: *Air Traffic Control the Netherlands*

Regarding the following condition APS "*The approach sector should be notified as Class C airspace*":

- Please clarify: when a SCL has expired and the trainee needs a refresher if it is possible to do this in a Unit specific environment with only a Class A airspace.
- LVNL does not support the statement that the approach sector **should be** notified as class C. We recommend the approach sector to be notified as other classes as as well when Class C airspace is not applied in the approach sector in reality. For example te LVNL situation: the APS of Schiphol is Class A, changing it to C would require us to train skills which will not be used.

response | Not accepted

The holder of a student air traffic controller licence who has not started exercising the privileges of that licence within 1 year from the date of its issuance or has interrupted exercising those privileges for a period of more than 1 year may only start or continue on-the-job training if he or she continues to satisfy the requirements relevant to the rating, which means that the conditions relevant to the rating have to be respected.
The European student ATCO licence is mutually recognisable. The APS rating requires that both IFR and VFR traffic can be controlled (this is already well established through the current training objectives) which is not possible in Class A airspace. Nonetheless, the text for the flight rules has been amended to clarify that 'at least

one VFR flight' be present in the assessment exercises which gives the ITO flexibility in respect of the proportion of VFR to IFR flights.

| comment | *590* | comment by: *FOCA Switzerland* |

In relation to the sentence "The approach sector should be notified as Class C airspace. The airspace below the approach CTA sector outside (around) CTR is classified as uncontrolled G airspace." we suggest to remove content on airspace classification. Indeed airspace classification is left to the Member States.

| response | Partially accepted |

The text has been modified to require that a portion of uncontrolled airspace is at least adjacent to the APS sector. The classification of the uncontrolled airspace is determined by the ITO.
The approach sector may be either Class or D airspace.

| comment | *631* ❖ | comment by: *European Transport Workers Federation - ETF* |

The levels of traffic are not found in all units under these conditions. Why should such standard be met when not in line with actual trafic thereafter ?

This appears to be more of a selection criteria for fitness for employment in given employer rather than a measure put in place to ensure relevant competence for actual traffic. It may also be achieved by students with more time available for training....

The lack of consensus within RMG is not stated : not fair at all.

| response | Not accepted |

European student ATCO licences are mutually recognisable. The conditions define a minimum harmonised level of performance.

| comment | *651* | comment by: *NSA Austria* |

Various Tables ("Conditions ADC, APS, ACS")

Why so detailed? Detailed prescription should be left to the Member States,

<u>Status quo:</u> Contains a lot of "wordings" which are not suitable for Austria (e.g. use of ATS-routes, airways, Airspace A,.....)
It should be clearly stated that these various tables are examples and have to be defined by the member state or a common airspace and a common set of exercises shall be designed

A definition of traffic level (eg. 28 A/C during 45min for ACS) without a comprehensive definition of airspace and traffic flows is no harmonization of complexity.

| response | Partially accepted |

The example airspaces and references to ATS routes have been removed. While the traffic levels remain, the TRAFFIC condition now details the traffic scenarios that are to be present in the assessment exercises.

More flexibility in relation to airspace classification is now possible with some airspaces being described only as 'uncontrolled', while for controlled airspaces more flexibility has been enabled for most ratings.

AMC6 ATCO.D.035(c);(e) Rating training examinations and assessment	p. 68

comment	*11*	comment by: *DFS Deutsche Flugsicherung GmbH*

Table "Conditions ACS"
"The training airspace should be notified as Class C airspace. ...."

In order to prevent that students will be trained for a situation that will never occur, we suggest to rephrase:
The airspace below ... is classified as airspace, **in which VFR traffic is allowed to fly without air traffic control clearance.**

This would allow the TO to inform the student that in the end the airspace classes are determined by the Member States and that sectors outside Class C may vary in classification. And it does not affect the ACC sector training itself.

response	Accepted

Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.

comment	*12*	comment by: *DFS Deutsche Flugsicherung GmbH*

Table "Conditions ACS"
"The CTA is designated RVSM airspace. ...All aircraft operating between ....."

It must be possible to train in a control sector where also military traffic is allowed.

Suggestion to rephrase accordingly:
The CTA is designated RVSM airspace. ...All **civil** aircraft operating between ....."

response	Accepted

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

comment	*28*	comment by: *ENAC ACTO Program Director*

The specifications exclude exempted RVSM military traffic with no reason. The specifications listed under AMC6 ATCO.D.035 (e) exclude military aircraft and integrated air traffic control.

Even though, in most cases, this is regulated with an exemption permit, this specification can be misunderstood.

response	Accepted
	The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

comment	*129*	comment by: *GdF*
	In line with our proposal (comment 122), this should be changed to a GM to the requested AMC, to allow for flexibility and adaptability. As is, it is prescribing the defined rating down to every detail, without giving ATS providers the flexibility to request more fitting criteria in training. It appears that EASA is mandating a specific type of cake that everyone is required to purchase and enjoy. However, what if an ATS provider prefers a different cake? How can you justify depriving them of the freedom to choose their own requirements? It seems that EASA's approach may limit diversity and hinder the ability of ATS providers to make informed decisions based on their unique needs and preferences. It is important to consider the value of allowing flexibility and autonomy in the selection process, as this can contribute to a more well-rounded and adaptable workforce.	

response	Noted
	The IR and AMC text has been amended to make clear that what is defined is a minimum. ITOs have the flexibility to add competencies, observable behaviours and additional conditions to their training programme if they consider this necessary for their local environment.

comment	*164*	comment by: *German NSA (BAF)*
	"There should be at least one major airport and one local airfield below the ACS sector and other airports in the adjacent sectors that will require integration of arriving and departing aircraft with the different performance specifications." Proposal: add another sentence "There should be at least one approach sector serving the aforementioned aerodromes." Rationale: the addition ensures consistency ast he next paragraph refers to an approach sector's airspace classification that is not introduced as a requirement before. Should it be left to the training organisation to define the AoRs of the approach function? There could be one approach unit serving more than one aerodrome or an approach unit pre aerodrome.	

response	Noted

The conditions for ACS were reviewed. A minimum set of elements to be present in the simulated environment were defined. In addition, a list of traffic scenarios that must be present in the assessment exercises were defined. With these conditions specified, the ITO can determine airspace configuration, including the AoR for the approach function and airspace classification.

comment	*165*	comment by: *German NSA (BAF)*

"The CTA is designated RVSM airspace between FL290 and FL410. All aircraft operating between FL290 and FL410 inclusive must be RVSM equipped."

Why this strict requirement regarding RVSM equipment. Military and "non-standard" operations are still included in the training and handling of non-RVSM-flights in an RVSM airspace should be part of the competence.

response	Accepted

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

comment	*206*	comment by: *DFS Deutsche Flugsicherung GmbH*

AMC6 ATCO.D.035(c);(e)

These very detailed described conditions (only these courses are taught within the DFS at the moment), would have a high time-consuming effect on our staff.
All our exercises must be adapted (none of the conditions are close to the simulation environment within the DFS), which requires a change to all exercises in regard of the basic setting (size, upper/lower level, nr. of RWYs) and thereafter an adaptation of every single exercise in regard of starting point of the acft, rewriting of every single pilot regie in regard of initial contact times or requests for level change and change of all our regies for the external borders that are written to train the surrounding airspaces. Every single planned conflict or problem in the actual exercises must thereafter be revalidated to confirm that it still exists and that the exercise has the planned outcome for the student. For these tasks we need time, staff and therefore a lot of money.

response	Noted

All conditions have been reviewed. The example airspace has been removed. The text has been modified to clarify that the conditions are a minimum and that more is possible. The simulated environment now contains a list of minimum elements that must be present and a set of traffic scenarios that must occur during assessment exercises. These amendments enable a large degree of flexibility in both the airspace and the exercise design.

comment	*228*	comment by: *CANSO*

Table "Conditions ACS"
"The CTA is designated RVSM airspace. ...All aircraft operating between ....."

The specifications exclude exempted RVSM military trafficwith no reason. The specifications listed under AMC6ATCO.D.035(e)
exclude military aircraft and integrated airtraffic control.
Even though, in most cases, this is regulated with anexemption permit, this specification can be misunderstood.

It must be possible to train in a control sector where also <u>military traffic</u> is allowed.

<u>Suggestion to rephrase accordingly:</u>
The CTA is designated RVSM airspace. ...All **civil** aircraft operating between

response	Accepted

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

comment	*230*	comment by: *CANSO*

Suggestion: Remove content on airspace classification

Airspace classification is left to the Member States. A Training Organisation shall combine regulation with the operationnal needs of the ANSP it works for, so it shall be able to teach the airspace classification of the state.

response	Accepted

Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.

comment	*337*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Are the traffic flows required for competency assessments, the calculation method for which is described on page 69 of the document, also fixed (as is the 45-minute assessment duration)?

Should adaptations be envisaged if the proposed traffic flow remains consistent with a 30 to 35-minute assessment in an initial training school?

The issue here is not to impose a 45-minute duration, as long as the traffic load is observed over a shorter session.

response	Noted

The TRAFFIC condition was reviewed and it was determined that with the traffic scenarios defined, a minimum of 45 minutes is required to demonstrate competency.

| comment | *338* | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

Airspace classification is left to the Member States.

The CTA is designated RVSM airspace between FL290 and FL410. All aircraft operating between FL290 and FL410 inclusive must be RVSM equipped. "
This sentence defines the conditions of the use of airspace, which is not the purpose of the ATCO IR.

| response | Accepted |

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

| comment | *392* | comment by: *FABEC TTF* |

The specifications listed under AMC6 ATCO.D.035(c);(e) exclude training to handle military aircraft in the RVSM airspace and integrated air traffic control. Even though, in most cases, this is regulated with an exemption permit, this specification can be misunderstood.

| response | Accepted |

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

| comment | *424* | comment by: *Naviair* |

Table "Conditions ACS"
"The CTA is designated RVSM airspace. ...All aircraft operating between..... "

The specifications exclude exempted RVSM military trafficwith no reason. The specifications listed under AMC6ATCO.D.035(e)
exclude military aircraft and integrated airtraffic control.
Even though, in most cases, this is regulated with anexemption permit, this specificationcan be misunderstood.
It must be possible to train in a control sector where also <u>military</u> traffic is allowed.
<u>Suggestion to rephrase accordingly:</u>
The CTA is designated RVSM airspace......All **civil** aircraft operating between

| response | Accepted |

The requirement for all aircraft operating between FL290 – FL410 to be RVSM-equipped has been removed. The simulated environment now requires a portion of the airspace to be RVSM, however normal operating procedures and exemptions apply, meaning that military aircraft may operate in the airspace.

| comment | *425* | comment by: *Naviair* |

Suggestion: Remove content on airspace classification
Airspace classification is left to the Member States. A Training Organisation shall combine regulation with the operationnal needs of the ANSP it works for, so it shall be able to teachthe airspace classification of the state.

response	Accepted
	Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.

comment	*455*	comment by: *DSNA chief of ATCO training program*

DSNA suggests removal of every content on airspace classification.
Airspace classification is left to the Member States. A Training Organisation shall combine regulation with the operationnal needs of the ANSP it works for, so it shall be able to teach the airspace classification of the state.

response	Accepted
	Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.

comment	*457*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Modify paragraph (4) to the "traffic levels and complexity" section of AMC6. ATCO. D .035 to add the following words : "**except for services providers providing flight tests,**" at the beginning of the sentence :

(4) except for air traffic services organisations providing flight tests services, all levels of traffic with the minimum of 28 aircraft per 45 minutes for the assessed exercise and should ideally not exceed 12 aircraft on frequency simultaneously,

and

Add a paragraph 8) to the "traffic levels and complexity" section of AMC6.ATCO.D.035 which creates additional conditions dedicated to flight tests :
« for air traffic services organisations providing flight test services, all traffic levels with a minimum of 1 aircraft in flight test per 45 minutes for the exercise being evaluated, and ideally should not exceed 28 aircraft in the environment. »

Justification :

At ATM/ANS TeBs, EASA raised a number of questions with the French Civil Aviation Authority concerning the validity of the ACS rating held by DGA EV's flight testing ATCOs (CAER), particularly as regards compliance of the flight testing ATCOs's' work with the procedures and methods "usually" implemented in the exercise of ACS, in the context of its ongoing work.
When controlled flight test activity in CAG applies requirements and procedures defined by the basic regulations, ATCOs providing these services are only required to hold a license issued after a certified CAG training which may comprise three phases:

- Initial training to acquire an initial level of knowledge and practical skills appropriate to functions exercised: at least one of the three ratings;
- Unit training to acquire a level of knowledge and practical skills appropriate for each unit endorsement established at the ATC unit as defined in the unit training plan;
- Continuation training according to the requirements contained in the unit competence scheme to maintain or complete acquired skills: unit endorsement valid for 3 years.

In accordance with REG (EU) 2017/373 and article ATS.TR.100 on working methods and operational procedures for air traffic service providers, the competent authority of air traffic service organizations providing flight test services may specify additional or alternative conditions and procedures (to the "usual" working methods and operational procedures) when necessary for the provision of flight test services.

Fully in line with these methods, the current guidance document GM1 ATCO.D.060/Part ATCO of REG (EU) 2015/340 states that the performance objectives of ATCOs providing ATS services to flight test activities should demonstrate that candidates (for the unit endorsement) manage the workload, provide the services and apply specific control procedures within an aerodrome, approach or control zone.

The model currently established in France for providing air traffic services for GAT flight tests is based on linking a "flight test" unit endorsement to an ATCO rating, e.g. Area Control Surveillance (ACS).

This French model could now be challenged by the proposal (NPA 2023-02) modifying the rules for granting CAG ratings to air traffic controllers.

The NPA 2023-02 introduces the notion of performance standards for initial training, based on competence models which, at this stage, do not appear to be fully adapted to providing an air traffic service to flight tests activities.

Without compromising the objectives pursued by NPA 2023-02, in particular the harmonization of the level of competence targeted at the end of initial training, DGAC FR would like to discuss with EASA on possible way to move forward so that initial training is appropriate for providing air traffic service to flight tests and provides the guarantee that candidates will safely manage this workload by applying specific ATC procedures as provided for in ATS.TR.160 of the implementing regulation (EU) 2017/373.

response	Not accepted AMC6 ATCO.D.035 is about the level of performance that is defined as acceptable when assessing whether or not competency for the issue of an ACS rating has been achieved. All applicants for a mutually recognised ACS rating should reach this performance level in the given conditions regardless of what environment they will work at later on. EASA appreciates the exchange that took place with the affected entities and it recalls that the mutual recognition attached to the European ATCO licence, including its ratings and rating endorsements, requires that their holders meet the same training and experience requirements and reach the same performance level throughout the EU.
comment	*478* comment by: *Air Traffic Control the Netherlands*

Regarding conditions ACS *"The training airspace should be notified as Class C airspace and above FL195 the sector could be notified as Class A airspace. The airspace below the CTA sector outside the approach sector is classified as uncontrolled G airspace"*:

LVNL does not support the statement that the training sector should be notified as class C. We recommend training airspace to be notified as other classes when Class C airspace below FL195 is not applied in reality. The amendment requires that trainees are trained in airspace where VFR is allowed while in practice this does not happen in the Netherlands. Our class C in ACC airspace is in places which is military airspace and starts higher than an ordinary VFR aircraft can reach at all. All changes do have consequences for LVNL because all rating training must be adapted to a different airspace than we have in the Netherlands at all. So the trainees are taught more skills than they actually need and than what is possible in practice.

response	Accepted
	Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.

comment	*591*	comment by: *FOCA Switzerland*
	In relation to the sentence "The training airspace should be notified as Class C airspace and above FL195 the sector could be notified as Class A airspace. The airspace below the CTA sector outside the approach sector is classified as uncontrolled G airspace." we suggest to remove content on airspace classification. Indeed airspace classification is left to the Member States.	
response	Accepted	
	Conditions were reviewed. The simulated environment for ACS now contains a list of minimum elements without specific airspace classifications. Nonetheless, it is a regulatory requirement for airspace above FL195 to be Class C.	

comment	*631* ❖	comment by: *European Transport Workers Federation - ETF*
	The levels of traffic are not found in all units under these conditions. Why should such standard be met when not in line with actual trafic thereafter ? This appears to be more of a selection criteria for fitness for employment in given employer rather than a measure put in place to ensure relevant competence for actual traffic. It may also be achieved by students with more time available for training.... The lack of consensus within RMG is not stated : not fair at all.	
response	Not accepted	
	European student ATCO licences are mutually recognisable. The conditions define a minimum harmonised level of performance.	

AMC1 ATCO.D.043(a) Principles of competency-based training and assessment for unit training

p. 73

comment	*13*	comment by: *DFS Deutsche Flugsicherung GmbH*

The new CBTA model means that Unit Training Organisations have to develop a CBTA as well. The provision of ATCO.D.043 requires to make use of the same elements as for basic and rating training, i.e. competencies, performances and observable behaviours.

The AMC1 requires that as minimum the competencies for rating training should be applied and refers to D.035 with the allowance to modify or complement them as needed for the real environment.

A reference to **AMC1** of D.035 may be a better reference, because as such, the relevant observable behaviours are as well addressed. In case where guest teachers are contracted for unit training, they would have the relevant knowledge (based on AMC1 D035) that does not need a complete renewal of applying the relevant competencies including observable behaviours but simply the adaptations made for the unit.

In consequence, either the unit training needs to adapt to the new CBTA principles completely, or the flexibility for adaptations - as provided by ICAO - should be possible in each of the three training sections. The latter is preferred.

response	Partially accepted

Please refer to the response provided to comment #426.

comment	*132*	comment by: *GdF*

The existing regulation, in our opinion, does not give the referenced flexibility to adapt. That is why, we proposed the changes to it. Since this AMC provides flexibility, we agree in general.

This should be an AMC to ATCO.D.035(c).
"To train and assess the capacity of an individual to perform at the standard expected in the ATC unit, the training organisation should develop an adapted competency model suitable for the specific local environment using as a minimum the competencies for rating training, as defined in ATCO.D.035(c). The adapted competency model should reflect the ATS unit's specific local environment and requirements. The selection or adaptation of the associated observable behaviours should be based on analysis of the specific environment, considering the regulatory, operational, technical and organisational requirements."

response	Not accepted

AMC1 ATCO.D.043(a) is clearly only about unit training and should therefore not be moved as AMC to rating training requirements.

comment	*229*	comment by: *CANSO*

The new CBTA model means that Unit Training Organisations have to develop a CBTA as well. The provision of ATCO.D.043 requires to make use of the same elements as for basic and rating training, i.e. competencies, performances and observable behaviours.

The AMC1 requires that as minimum the competencies for rating training should be applied and refers to D.035 with the allowance to modify or complement them as needed for the real environment.

A reference to **AMC1** of D.035 may be a better reference, because as such, the relevant observable behaviours are as well addressed. In case where guest teachers are contracted for unit training, they would have the relevant knowledge (based on AMC1 D035) that does not need a complete renewal of applying the relevant competencies including observable behaviours but simply the adaptations made for the unit.

In consequence, either the unit training needs to adapt to the new CBTA principles completely, or the flexibility for adaptations - as provided by ICAO - should be possible in each of the three training sections. The latter is preferred.

response	Partially accepted
	Please refer to the response provided to comment #426.

comment	*361*	comment by: *TO Austro Control*
	The adapted competency model means that Unit Training Organisations have to develop a CBTA as well.	
	The CBTA are a way of training that helps the ATCO student to reach that level but that level is achievable with other training methods as well.	
	There is a need to have more options in achieving the same objectives.	
response	Noted	
	One of the 'key objectives' of the CBTA methodology is to have the flexibility to tailor a particular training programme to what is needed to train an individual candidate for a particular job profile. At the same time, the context of mutual recognition of licences across Member States and the need for both a level playing field in the training domain and legal certainty in general do require, to a certain extent, minimum (mandatory) standards for the design and the conduct of CBTA for the purpose of issuing European personnel licences.	

comment	*426*	comment by: *Naviair*
	The new CBTA model means that Unit Training Organisations have to develop a CBTA as well. The provision of ATCO.D.043 requires to make use of the same elements as for basic and rating training, i.e. competencies, performances and observable behaviours.	

The AMC1 requires that as minimum the competencies for rating training should be applied and refersto D.035 with the allowance to modify or complement them as needed for the real environment.

A reference to **AMC1** of D.035 may be a better reference, because as such, the relevant observable behaviours are as well addressed. In case where guest teachers are contracted for unit training, they would have the relevant knowledge (based on AMC1 D035) that does not need a complete renewal of applying the relevant competencies including observable behaviours but simply the adaptations made for the unit.

In consequence, either the unit training needs to adapt to the new CBTA principles completely, or the flexibility for adaptations - as provided by ICAO - should be possible in each of the three training sections. The latter is preferred.

AMC2 ATCO.D.055(b)6   -   Duration of unit endorsement courses

GM1 ATCO.D.060(a)2 b   -   Hours accumulated on approved STD during this phase cannot be counted towards the minimum duration of on-the-job training established in accordance of the training for procedures unlikely to be encountered in the operational environment during the training.

AMC1 ATCO.OR.C015(b) c   -   When an STD is used for ~~pre-~~on-the-job trainingand the training time is counted as part of the operational training, the STD classification should be a high-fidelity simulator

-> It is a bit unclear with these three different paragraphs on how to count time. Per definition, counting hours only on position is contradicting the concept of CBT.

Just using STD for "situations unlikely to be encountered" is to close the opportunity for astudent to practice also normal procedures as repetition and preparation at units with lowtraffic.

response	Partially accepted

A reference to AMC1 ATCO.D.035(c);(e) is added to AMC1 ATCO.D.043(a) on top of the reference to ATCO.C.035(c) to include the observable behaviours.

The final objective of the implementation of CBTA is to have a 'full' CBTA regulatory framework. However, both competent authorities and training providers need to become familiar with the new methodology and philosophy and gradually prepare the infrastructure for changing (extending) from one methodology to the other. The CBTA regulatory framework should support such 'step-by-step' implementation, as necessary, for example by allowing the implementation of 'mixed CBTA' as an interim step. 'Mixed CBTA' in this context means that training programmes would already be designed in full in accordance with the CBTA methodology while an overall minimum course duration (training hours) and/or a conventional one-off skill-testing event at the end of the course would still be required. AMC2 ATCO.D.055(b)(6), which has to be read together with AMC1 ATCO.D.055(b)(6), is therefore proposed to be kept as is.

comment	*652*	comment by: *NSA Austria*

The adapted competency model means that Unit Training Organisations have to develop a CBTA as well.

The CBTA are a way of training that helps the ATCO student to reach that level but that level is achievable with other training methods as well.

There is a need to have more options in achieving the same objectives.

response	Noted

Please refer to the response provided for comment #361.

ATCO.D.043 Principles of competency-based training and assessment for unit training   p. 73

comment	*131*	comment by: *GdF*

This should be an AMC to ATCO.D.003.

response	Not accepted

ATCO.D.003 is part of the general training requirements that apply for all types of training, whereas ATCO.D.043 applies only to unit training and should therefore stay in Section 3 - Unit training requirements.
The general principles of CBTA ATCO.D.003 are presented at the rule level and the same level of regulation should therefore apply also for CBTA principles for unit training.

comment	*278*	comment by: *BCAA*

strange wording "wide variety of work"

response	Noted

ICAO uses this wording.

AMC1 ATCO.D.045(c)(3) Composition of unit training   p. 74

comment	*47*	comment by: *Croatian Civil Aviation Agency*

1) The proposal is to use candidate instead of applicant in this AMC.

2) Proposal to check whole document and make consistent wording when to use applicant, candidate, student, trainee and individual.

Explanation:
For the reason of consistance.

It is noticed that, during transposition of the text from ICAO Docs, there is a mixture of using different words for the same purposes i.e. applicant, candidate, student,

trainee and individual. Of course, sometimes it is relevant to be clear and use appropriate word, but sometimes in the text there is no consistance.

response	Partially accepted
	In the NPA the word 'candidate' was proposed to be used only in the context of basic training as no application for a licence, rating or endorsement will follow after a basic training examination or assessment.
	Definitions for 'candidate' and 'applicant' have been introduced and a consistency check has been performed.
	'Trainee' is used in its dictionary meaning and 'student' is only used for student ATCO licence holders.

comment	*191*	comment by: *CroControl*
	Candidate instead of applicant.	

response	Noted
	Please refer to the response provided to comment #47.

AMC1 ATCO.D.045(c)(4) Composition of unit training   p. 74

comment	*48*	comment by: *Croatian Civil Aviation Agency*
	1) The proposal is to use candidate instead of applicant in this AMC.	
	2) Proposal to check whole document and make consistent wording when to use applicant, candidate, student, trainee and individual.	
	Explanation:	
	For the reason of consistance.	
	It is noticed that, during transposition of the text from ICAO Docs, there is a mixture of using different words for the same purposes i.e. applicant, candidate, student, trainee and individual. Of course, sometimes it is relevant to be clear and use appropriate word, but sometimes in the text there is no consistance.	

response	Partially accepted
	In the NPA the word 'candidate' was proposed to be used only in the context of basic training as no application for a licence, rating or endorsement will follow after a basic training examination or assessment.
	Definitions for 'candidate' and 'applicant' have been introduced and a consistency check has been performed.
	'Trainee' is used in its dictionary meaning and 'student' is only used for student ATCO licence holders.

comment	*133*	comment by: *GdF*

	Request to add a definition of team resource management to Article 4.
response	Partially accepted
	It would not be appropriate to add a definition of a word that is only used in AMC in the regulation.
	However, GM1 ATCO.D.080(b)(3) Refresher training (see ED Decision 2023/011/R) makes reference to Network Manager document 'Team Resource Management — Guidelines for the Implementation and Enhancement of TRM', which includes the definition of team resource management. Similar GM will be added to ATCO.D.045 on unit training.

AMC2 ATCO.D.055(b)(6) Composition of unit training   p. 75

comment	*70*	comment by: *LFV*
	AMC2 ATCO.D.055(b)6 + GM1 ATCO.D.060(a)2 b + AMC1 ATCO.OR.C015(b) c	
	It is a bit unclear with these three different paragraphs on how to count time. Per definition, counting hours only on position is contradicting the concept of CBT. Just using STD for "situations unlikely to be encountered" is to close the opportunity for a student to practice also normal procedures as repetition and preparation at units with low traffic.	
response	Accepted	
	The proposal is deleted.	

comment	*110*	comment by: *GdF*
	The example "determination by the instructor after the session" is exceptionally vague. Request to delete or see comment 111.	
response	Accepted	
	The proposal is deleted.	

comment	*111*	comment by: *GdF*
	Generally, we hold the opinion, that examples on how to satisfy an AMC should be moved to a GM, which would give more room to explain what is actually meant. Request to move the examples to GM and add explanatory text.	
response	Accepted	
	The proposal is deleted.	

comment	*235*	comment by: *CANSO*
	• AMC2 ATCO.D.055(b)6 - Duration of unit endorsement courses	

- GM1 ATCO.D.060(a)2 b - Hours accumulated on approved STD during this phase cannot be counted towards the minimum duration of on-the-job training established in accordance of the training for procedures unlikely to be encountered in the operational environment during the training.

- AMC1 ATCO.OR.C015(b) c - When an STD is used for ~~pre~~-on-the-job training and the training time is counted as part of the operational training, the STD classification should be a high-fidelity simulator

-> It is a bit unclear with these three different paragraphs on how to count time. Per definition, counting hours only on position is contradicting the concept of CBT. Just using STD for "situations unlikely to be encountered" is to close the opportunity for a student to practice also normal procedures as repetition and preparation at units with low traffic.

response	Accepted
	The proposal is deleted.

comment	*242*	comment by: *CANSO*

AMC2 ATCO.D.055(b)(6) Composition of unit training DURATION OF UNIT ENDORSEMENT COURSES The duration of the unit endorsement course should refer to the number of hours that can be counted as training, in order to distinguish them from the trainee's overall working hours. The training organisation should describe how to count these training hours (e.g. exclusion of low-traffic periods, limitation of the number of night shift hours, determination by the instructor after the session, etc.)

Note: The AMC contains two new expressions, that is *'training hours'* and *'working hours'*. They are neither applied, nor explained in the relevant regulations. It also expresses the fact that the duration of a unit endorsement course can only be counted in hours.

response	Accepted
	The proposal is deleted.

comment	*276*	comment by: *BCAA*

It is not clear from this AMC what exactly is asked for. Does "training" only concern OJT in this case? What about theoretical training and simulator training?

response	Accepted
	The proposal is deleted.

comment	*428*	comment by: *Naviair*

AMC2 ATCO.D.055(b)(6) Composition of unit training DURATION OF UNIT ENDORSEMENT COURSES The duration of the unit endorsement course should refer to the number of hours that can be counted as training, in order to distinguish them from the trainee's overall working hours. The training organisation should describe how to count these training hours (e.g. exclusion of low-traffic periods, limitation of the number of nightshift hours, determination by the instructor after the session, etc.)

response	Accepted

comment	*632*	comment by: *European Transport Workers Federation - ETF*

This is overly prescriptive and not adapted for all situations. Nor is it justified by evidence presented, the justification states that it is a GM while it is under a new AMC... A GM may be considered by definitely not an AMC.

response	Accepted
	The proposal is deleted.

ATCO.D.055 Unit training plan   p. 75

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comment	*241*	comment by: *CANSO*

Rationale ATCO.D.055 GM has been added to give further guidance on how the duration of training should be counted. The AMC on desirable behaviours for abnormal and emergency situations is proposed to be deleted because the same issue is covered by the requirement in ATCO.D.043 for the training organisations to establish performance criteria.

Note: The referred GM in NPA is missing, however the text contains an AMC. Is that only a miswording?

response	Accepted

The proposal is deleted.

comment	427	comment by: *Naviair*

Rationale ATCO.D.055 GM has been added to give further guidance on how the duration of training should be counted. The AMC on desirable behaviours for abnormal andemergency situations is proposed to be deleted because the same issue is covered by the requirement in ATCO.D.043 for the training organisations to establish performance criteria.

Note: The referred GM in NPA is missing, however the text contains an AMC. Is thatonly a miswording?

response	Accepted

Please refer to the response provided to comment #241.

comment	466	comment by: *IAA*

Rationale ATCO.D.055 states,

GM has been added to give further guidance on how the duration of training should be counted.

Comment - 'GM' does not appear to be added. Possible editorial change to '*AMC2 has been added...*'

response	Accepted

Please refer to the response provided to comment #241.

comment	584	comment by: *CAA Norway*

Comment/question regarding AMC2 ATCO.D.055(b)(6). Suggestion as AMC, but Rationale says GM. Will it be a GM or an AMC?

AMC2 ATCO.D.055(b)(6) Composition of unit training DURATION OF UNIT ENDORSEMENT COURSES
The duration of the unit endorsement course should refer to the number of hours that can be counted as training, in order to distinguish them from the trainee's overall working hours. The training organisation should describe how to count these training hours (e.g. exclusion of low-traffic periods, limitation of the number of night shift hours, determination by the instructor after the session, etc.).

Rationale ATCO.D.055 GM has been added to give further guidance on how the duration of training should be counted.

response	Accepted

Please refer to the response provided to comment #241.

AMC1 ATCO.D.055(b)(14) Unit training plan   p. 75

comment	*454*	comment by: *DSNA chief of ATCO training program*

For information, this represents a great amount of work for DSNA but it was already our plan to do it that way, it's very well received.

response	Noted

GM1 ATCO.D.060(a)(2) Unit endorsement course   p. 76

comment	*52*	comment by: *Croatian Civil Aviation Agency*

In point (a) is stated that part-task trainer may be used for OJT what is not in accordance with the AMC1 ATCO.OR.C.015(b) where in the table is stated that only HI FI SIM or SIM can be used for unit training.

response	Not accepted

The table in AMC1 ATCO.OR.C.015(b) refers to provision of unit training, e.g. pre-OJT, whereas GM1 ATCO.D.060(a)(2) provides guidance on different means to SUPPLEMENT the provided OJT.

comment	*70* ❖	comment by: *LFV*

AMC2 ATCO.D.055(b)6 + GM1 ATCO.D.060(a)2 b + AMC1 ATCO.OR.C015(b) c

It is a bit unclear with these three different paragraphs on how to count time. Per definition, counting hours only on position is contradicting the concept of CBT.
Just using STD for "situations unlikely to be encountered" is to close the opportunity for a student to practice also normal procedures as repetition and preparation at units with low traffic.

response	Noted

AMC2 ATCO.D.055(b)(6) has been deleted. GM1 ATCO.D.060(a)(2) indicates that the training that can be counted as part of operational training is training for procedures, which is unlikely to be encountered in the operational environment during the training. The opportunity for a student to practise normal procedures using STDs is still available, it is just that this training cannot be counted as on-the-job-training.

comment	*100*	comment by: *ENAIRE*

In relation with the training for *"procedures unlikely to be encountered",* we consider that it should be added to the GM (here, where mentioned, or in the definitions) the possibility of counting the hours practiced of these skills in an approved STD when they would not be encounter in the on-the-job training.

response	Noted
	The procedures unlikely to be encountered in the operational environment could be, besides the unusual and emergency procedures, LVP, reduced separation, etc., any other procedure that the training would include but the OJT session would not provide for them.

comment	*112*	comment by: *GdF*
	(b) "cannot" We don't agree that this is a proper verb in the context of a GM. Please rephrase / see comment 113.	
response	Accepted	

comment	*113*	comment by: *GdF*
	While we acknowledge the intention behind it, the global pandemic has revealed that both educational institutions and students have embraced the utilization of synthetic training devices and the inclusion of the accumulated time in their training records.

We know that this is just GM, but especially considering the use of the word "cannot" in the text, we would propose to rephrase: "While the accumulated hours on approved synthetic training devices should not be counted...
Training organisations may count these hours towards the minimum duration of the on-the-job training, for example, if procedures unlikely to be encountered in the operational environment are trained or when faced with large-scale disruptions to students' training progress." | |
| response | Accepted | |

comment	*114*	comment by: *GdF*
	Propose to add (c) regarding maximum training hours: "If training organisations count hours accumulated on synthetic training devices towards the minimum duration of on-the-job training, only a limited quantity of these hours should be counted towards the maximum training hours. The specific quantity of these hours should be determined by the training organisation and agreed upon by the competent authority, considering factors such as the simulator rating in accordance with AMC1 ATCO.OR.C.015(b)."

Related to comment 113. | |
| response | Not accepted | |

The inclusion of synthetic training device hours towards the maximum on-the-job training hours compromises the essential real-world experience required for air traffic control officers, leading to inconsistencies, potential over-reliance on simulators, and compromising the overall training quality and regulatory clarity.

comment	194	comment by: *CroControl*

Point a
It is stated that part-task trainer may be used for OJT what is not in accordance with the AMC1 ATCO.OR.C.015(b) where in the table is stated that only HI FI SIM or SIM can be used for unit training.

response	Not accepted

Please refer to the response provided to comment #52.

ATCO.D.060 Unit endorsement course   p. 76

comment	99	comment by: *ENAIRE*

ATCO.D.060 (c):
It should only be #043, not #0435. Number 5 should be removed.

response	Accepted

comment	243	comment by: *CANSO*

ATCO.D.060 Unit endorsement course […]
GM1 ATCO.D.060(c) Unit endorsement course COMPETENCIES AND PERFORMANCE CRITERIA OBJECTIVES FOR AIR TRAFFIC CONTROLLERS PROVIDING SERVICES TO AIRCRAFT CARRYING OUT FLIGHT TESTS
GM1 ATCO.D.070 Assessments during unit endorsement courses
(a) DEDICATED ASSESSMENTS
(1) A dedicated assessment should be carried out for the issue or renewal of a unit endorsement.
(2) A dedicated assessment may consist of a single assessment or a series of assessments, as detailed in the unit training plan. In the case of a single assessment, the evaluation reports provided by the instructors should be built on multiple observations.
(3) To conduct a dedicated assessment, the assessor(s) should sit with the applicant with the purpose of observing the quality and assessing the standard of work being carried out and, if also acting as OJTI at the same time, of to maintaining a safe, orderly and expeditious flow of air traffic.

Note: It seems necessary to clarify if the instructor, the assessor of both of them are entitled to perform dedicated assessment. Nonetheless, the measure contradicts ATCO.C.045 Assessor privileges.

response | Accepted

New definitions for assessment and for the role/privileges of OJTIs, STDIs and assessors have been introduced.

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comment | *429*   comment by: *Naviair*

ATCO.D.060 Unit endorsement course […]

GM1 ATCO.D.060(c) Unit endorsement course COMPETENCIES AND PERFORMANCE CRITERIA OBJECTIVES FOR AIR TRAFFIC CONTROLLERS PROVIDING SERVICES TO AIRCRAFT CARRYING OUT FLIGHT TESTS

GM1 ATCO.D.070 Assessments during unit endorsement courses

DEDICATED ASSESSMENTS

A dedicated assessment should be carried out for the issue or renewal of a unit endorsement.

A dedicated assessment may consist of a single assessment or a series of assessments, as detailed in the unit training plan. In the case of a single assessment, the evaluation reports provided by the instructors should be built on multiple observations.

To conduct a dedicated assessment, the assessor(s) should sit with the applicant with the purpose of observing the quality and assessing the standard of work being carried out and, if also acting as OJTI at the same time, of to maintaining a safe, orderly and expeditious flow of air traffic.

Note: It seems necessary to clarify if the instructor, the assessor of both of them are entitled to perform dedicated assessment. Nonetheless, the measure contradicts ATCO.C.045 Assessor privileges.

response | Accepted

New definitions for assessment and for the role/privileges of OJTIs, STDIs and assessors have been introduced.

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comment | *457* ❖   comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Modify paragraph (4) to the "traffic levels and complexity" section of AMC6. ATCO. D .035 to add the following words : "**except for services providers providing flight tests,**" at the beginning of the sentence :

(4) except for air traffic services organisations providing flight tests services, all levels of traffic with the minimum of 28 aircraft per 45 minutes for the assessed exercise and should ideally not exceed 12 aircraft on frequency simultaneously,

and

Add a paragraph 8) to the "traffic levels and complexity" section of AMC6.ATCO.D.035 which creates additional conditions dedicated to flight tests :
« for air traffic services organisations providing flight test services, all traffic levels with a minimum of 1 aircraft in flight test per 45 minutes for the exercise being evaluated, and ideally should not exceed 28 aircraft in the environment. »

Justification :

At ATM/ANS TeBs, EASA raised a number of questions with the French Civil Aviation Authority concerning the validity of the ACS rating held by DGA EV's flight testing ATCOs (CAER), particularly as regards compliance of the flight testing ATCOs's' work with the procedures and methods "usually" implemented in the exercise of ACS, in the context of its ongoing work.

When controlled flight test activity in CAG applies requirements and procedures defined by the basic regulations, ATCOs providing these services are only required to hold a license issued after a certified CAG training which may comprise three phases:
- Initial training to acquire an initial level of knowledge and practical skills appropriate to functions exercised: at least one of the three ratings;
- Unit training to acquire a level of knowledge and practical skills appropriate for each unit endorsement established at the ATC unit as defined in the unit training plan;
- Continuation training according to the requirements contained in the unit competence scheme to maintain or complete acquired skills: unit endorsement valid for 3 years.

In accordance with REG (EU) 2017/373 and article ATS.TR.100 on working methods and operational procedures for air traffic service providers, the competent authority of air traffic service organizations providing flight test services may specify additional or alternative conditions and procedures (to the "usual" working methods and operational procedures) when necessary for the provision of flight test services.

Fully in line with these methods, the current guidance document GM1 ATCO.D.060/Part ATCO of REG (EU) 2015/340 states that the performance objectives of ATCOs providing ATS services to flight test activities should demonstrate that candidates (for the unit endorsement) manage the workload, provide the services and apply specific control procedures within an aerodrome, approach or control zone.

The model currently established in France for providing air traffic services for GAT flight tests is based on linking a "flight test" unit endorsement to an ATCO rating, e.g. Area Control Surveillance (ACS).

This French model could now be challenged by the proposal (NPA 2023-02) modifying the rules for granting CAG ratings to air traffic controllers.

The NPA 2023-02 introduces the notion of performance standards for initial training, based on competence models which, at this stage, do not appear to be fully adapted to providing an air traffic service to flight tests activities.

Without compromising the objectives pursued by NPA 2023-02, in particular the harmonization of the level of competence targeted at the end of initial training, DGAC FR would like to discuss with EASA on possible way to move forward so that initial training is appropriate for providing air traffic service to flight tests and provides the guarantee that candidates will safely manage this workload by applying specific ATC procedures as provided for in ATS.TR.160 of the implementing regulation (EU) 2017/373.

response	Not accepted

AMC6 ATCO.D.035 is about the level of performance that is defined as acceptable when assessing whether or not competency for the issue of an ACS rating has been achieved. All applicants for a mutually recognised ACS rating should reach this performance level in the given conditions regardless of what environment they will work at later on.

EASA appreciates the exchange that took place with the affected entities and it recalls that the mutual recognition attached to the European ATCO licence, including its ratings and rating endorsements, requires that their holders meet the same training and experience requirements and reach the same performance level throughout the EU.

GM1 ATCO.D.060(c) Unit endorsement course p. 76

comment	*345* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Creation/amendment requests for flight test

At ATM/ANS TeBs,EASA raised a number of questions with the French Civil Aviation Authority concerning the validity of the ACS rating held by DGA EV's flight testing ATCOs (CAER), particularly as regards compliance of the flight testing ATCOs's' work with the procedures and methods "usually" implemented in the exercise of ACS, in the context of its ongoing work.
When controlled flight test activity in CAG applies requirements and procedures defined by the basic regulations, ATCOs providing these services are only required to hold a license issued after a certified CAG training which may comprise three phases:

-        Initial training to acquire an initial level of knowledge and practical skills appropriate to functions exercised: at least one of the three ratings;
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-        Continuation training according to the requirements contained in the unit competence scheme to maintain or complete acquired skills: unit endorsement valid for 3 years.

In accordance with REG (EU) 2017/373 and article ATS.TR.100 on working methods and operational procedures for air traffic service providers, the competent authority of air traffic service organizations providing flight test services may specify additional or alternative conditions and procedures (to the "usual" working methods and operational procedures) when necessary for the provision of flight test services.

Fully in line with these methods, the current guidance document GM1 ATCO.D.060/Part ATCO of REG (EU) 2015/340 states that the performance objectives of ATCOs providing ATS services to flight test activities should demonstrate that candidates (for the unit endorsement) manage the workload, provide the services and apply specific control procedures within an aerodrome, approach or control zone.

The model currently established in France for providing air traffic services for GAT flight tests is based on linking a "flight test" unit endorsement to an ATCO rating, e.g. Area Control Surveillance (ACS).

This French model could now be challenged by the proposal (NPA 2023-02) modifying the rules for granting CAG ratings to air traffic controllers.

The NPA 2023-02 introduces the notion of performance standards for initial training, based on competence models which, at this stage, do not appear to be fully adapted to providing an air traffic service to flight tests activities.

Without compromising the objectives pursued by NPA 2023-02, in particular the harmonization of the level of competence targeted at the end of initial training, DGAC FR would like to discuss with EASA on possible way to move forward so that initial training is appropriate for providing air traffic service to flight tests and provides the guarantee that candidates will safely manage this workload by applying specific ATC procedures as provided for in ATS.TR.160 of the implementing regulation (EU) 2017/373.

response | Noted

comment | *457* ❖   comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Modify paragraph (4) to the "traffic levels and complexity" section of AMC6. ATCO. D .035 to add the following words : "**except for services providers providing flight tests,**" at the beginning of the sentence :

(4) except for air traffic services organisations providing flight tests services, all levels of traffic with the minimum of 28 aircraft per 45 minutes for the assessed exercise and should ideally not exceed 12 aircraft on frequency simultaneously,

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Add a paragraph 8) to the "traffic levels and complexity" section of AMC6.ATCO.D.035 which creates additional conditions dedicated to flight tests :
« for air traffic services organisations providing flight test services, all traffic levels with a minimum of 1 aircraft in flight test per 45 minutes for the exercise being evaluated, and ideally should not exceed 28 aircraft in the environment. »

Justification :

At ATM/ANS TeBs, EASA raised a number of questions with the French Civil Aviation Authority concerning the validity of the ACS rating held by DGA EV's flight testing ATCOs (CAER), particularly as regards compliance of the flight testing ATCOs's' work with the procedures and methods "usually" implemented in the exercise of ACS, in the context of its ongoing work.
When controlled flight test activity in CAG applies requirements and procedures defined by the basic regulations, ATCOs providing these services are only required to hold a license issued after a certified CAG training which may comprise three phases:

-        Initial training to acquire an initial level of knowledge and practical skills appropriate to functions exercised: at least one of the three ratings;

-        Unit training to acquire a level of knowledge and practical skills appropriate for each unit endorsement established at the ATC unit as defined in the unit training plan;

-        Continuation training according to the requirements contained in the unit competence scheme to maintain or complete acquired skills: unit endorsement valid for 3 years.

In accordance with REG (EU) 2017/373 and article ATS.TR.100 on working methods and operational procedures for air traffic service providers, the competent authority of air traffic service organizations providing flight test services may specify additional or alternative conditions and procedures (to the "usual" working methods and operational procedures) when necessary for the provision of flight test services.

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This French model could now be challenged by the proposal (NPA 2023-02) modifying the rules for granting CAG ratings to air traffic controllers.

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Without compromising the objectives pursued by NPA 2023-02, in particular the harmonization of the level of competence targeted at the end of initial training, DGAC FR would like to discuss with EASA on possible way to move forward so that initial training is appropriate for providing air traffic service to flight tests and provides the guarantee that candidates will safely manage this workload by applying specific ATC procedures as provided for in ATS.TR.160 of the implementing regulation (EU) 2017/373.

response	Not accepted
	AMC6 ATCO.D.035 is about the level of performance that is defined as acceptable when assessing whether or not competency for the issue of an ACS rating has been achieved. All applicants for a mutually recognised ACS rating should reach this performance level in the given conditions regardless of what environment they will work at later on.

EASA appreciates the exchange that took place with the affected entities, and it recalls that the mutual recognition attached to the European ATCO licence, including its ratings and rating endorsements, requires that their holders meet the same training and experience requirements and reach the same performance level throughout the EU. |

ATCO.D.070 Assessments during unit endorsement courses   p. 77

comment	*50*	comment by: *Croatian Civil Aviation Agency*
	The proposal to write "performance" instead of "skills" in point (b).	
	In order to be consistent with the wording and changes made in the whole document.	
response	Not accepted	
	Skills are used in the text in various situations and is kept for its relevance.	

comment	*192*	comment by: *CroControl*
	Point (b) change Performance instead of skills (consistency)	
response	Not accepted	
	Skills are used in the text in various situations and has been decided to be used for its relevance.	

comment	*382*	comment by: *FABEC TTF*
	In accordance with the definition, during unit training, evaluation can be performed by the instructor or assessor. Of course, the applicant's final assessment shall be conducted in the operational environment under normal operational conditions and performed by the assessor. 'Assessment' means a determination by an assessor as to whether a person meets a required competency standard under given conditions, by collecting evidence from observable behaviours. The assessment leads to the issue of the licence, rating and/or endorsement(s) and their revalidation and/or renewal, including practical application of knowledge and understanding being demonstrated by the person being assessed. The assessment shall be performed by the assessor but evaluation can be done by the instructor. The title of the requirement does not align with the description in the paragraph (b) (assessment/evaluation).	
response	Accepted	
	The new definitions of assessment and of the assessor privileges clarify this.	

GM1 ATCO.D.070 Assessments during unit endorsement courses   p. 77

comment	*104*	comment by: *ENAIRE*
	GM1 ATCO.D.070 (2): We would like to know how many observations are considered "*multiple observations*".	
response	Noted	
	The term 'multiple observations' has been deleted. A new definition for assessment is provided.	

comment	211	comment by: *Air Traffic Control the Netherlands*

Regarding the text "*In the case of a single assessment, the evaluation reports provided by the instructors should be built on multiple observations*":
Feedback is requested that this piece needs more definition. So for example: In the case of a single assessment, the evaluation reports provided by the instructors should be built on multiple observations during a representative shift.

response	Noted

The term 'multiple observations' has been deleted. A new definition for assessment is provided.

comment	362	comment by: *TO Austro Control*

For those situations where an applicant's performance cannot be observed at the time of the assessment (e.g. low-visibility operations, snow clearing, military activity, etc.), the assessment may be supplemented by synthetic training device sessions, **multiple observation reports** and oral examination.

response	Noted

The term 'multiple observations' has been deleted. A new definition for assessment is provided.

comment	654	comment by: *NSA Austria*

For those situations where an applicant's performance cannot be observed at the time of the assessment (e.g. low-visibility operations, snow clearing, military activity, etc.), the
assessment may be supplemented by synthetic training device sessions, **multiple observation reports** and oral examination.

response	Noted

The term 'multiple observations' has been deleted. A new definition for assessment is provided.

ATCO.D.075 Continuation training   p. 79

comment	179	comment by: *EPN*

We don't see the point of the addition of 'when relevant'. Surly conversion training would only be conducted when required, as dictated by a safety assessment of some decsription? ATCO.D.075 only serves to define Continuation training.

The way it is written is confusing and may be perceived as conversion training is a part of refresher training.

response	Not accepted

ATCO.D.005 contains the same text and alignment with it was considered.

GM1 ATCO.D.080(c) Refresher training	p. 79

comment	*592*	comment by: *Estonian Transport Administration*

It needs to be an AMC point rather than a GM. Additionally, we would suggest to add "*and detailed*" to the phrase and it should be as follows: The syllabus **shall/should** include a clear **and detailed** description of the objectives and methods to be used for the evaluation of practical skills and theoretical knowledge.

response	Partially accepted

There is no clear reason to elevate the text to AMC level. However, the wording is improved for clarity.

ATCO.D.080 Refresher training	p. 79

comment	*633*	comment by: *European Transport Workers Federation - ETF*

We would like to state publicly once more that we consider that systematic evaluation of refresher training is overly burdensome and not always needed. It creates a feeling of lack of trust in the ATCOs.

response	Noted

comment	*668*	comment by: *Romanian CAA*

Text NPA
(b) Refresher training shall be designed to review, reinforce or enhance the existing knowledge and practical performance ~~skills~~ of air traffic controllers to provide a safe, orderly and expeditious flow of air traffic and shall contain at least:

Proposed text
(b) Refresher training shall be designed to review, reinforce or enhance the existing practical knowledge and ~~practical performance~~ of air traffic controllers to provide a safe, orderly and expeditious flow of air traffic and shall contain at least:

Justification
1) ATCO B.025, ATCO.D.080 and AMC1 ATCO.D.080 refer only to evaluation during refresher training.
2) The definition of „evaluation" implies only training on STDI or in other simulated environments.
3) If it is considered the need for examinations of some subjects, EASA should revise ATCO B.025 ATCO.D.080 and AMC1 ATCO.D.080 and introduce the notion of examination, besides evaluation, for the completion of conversion training

response	Not accepted

The knowledge could be theoretical or practical similar to the parts of the UTP.
The elimination of evaluations and going back to the assessments provides the necessary flexibility.

ATCO.D.085 Conversion training	p. 80

comment	*271*	comment by: *BCAA*

(c)(2)
--> open to "evaluations, examinations or assessments"

response	Accepted

Evaluation is removed to enhance clarity.

comment	*634*	comment by: *European Transport Workers Federation - ETF*

Conversion training requirements are not fit for purpose, it creates a high and costly standard therefore leading to less training on changes being provided replaced by more written briefing rather than a moment of live echange with an expert of the change. The need for an evaluation process does not help either. A third level of training on changes to the functional system is needed between this high standard and nothing required.

response	Noted

The conversion training is derived from the safety arguments of changes to the functional system. Training of ATCOs is one mitigation measure among others, so there is a need to be included in the safety argument and presented to CA for approval.

comment	*669*	comment by: *Romanian CAA*

Text NPA
(c) Conversion training courses shall include the determination of:
(1) the appropriate training method for and duration of the course, taking into account the nature and extent of the change; and
(2) the ~~examination or~~ evaluation ~~and/or assessments~~ methods for the conversion training.

Proposed text
(c) Conversion training courses shall include the determination of:
(1) the appropriate training method for and duration of the course, taking into account the nature and extent of the change; and
(2) the evaluation methods for the conversion training;
(3) the assessment when the change to the functional system requires the introduction of a new unit endorsement.

Justification
For harmonization with AMC1 ATCO.B.025(a)(10)

response	Accepted

Alignment with AMC1 ATCO.B.025(a)(10).

GM1 ATCO.D.085(b) Conversion training — p. 80

comment	436	comment by: *IFATCA*

IFATCA would suggest all training is done before implementation. This comment is too vague and potentially misleading. It is more important that the ATCO is trained in good time, before the implementation date. This should also be state that it should not be done too far in advance where the ATCO could forget what they have learnt.

Reword to state training should take place in a reasonable time frame to ensure all ATCOs are conversant and not too far before implementation that they forget their training.

response	Noted

The reinforcement of this training to be done before the change is implemented is already set in ATCO.D.085(d). GM1 ATCO.D.085(b) is intended to provide more explanations on when such training is required and to link this part with Regulation (EU) 2017/373.

AMC2 ATCO.D.090(a)(1) Training of practical instructors — p. 82

comment	24	comment by: *ENAC ACTO Program Director*

Observable Behaviours OB 2.1 + OB 2.2 => An instructor working in a simulation environment is subject to different conditions regarding immediate intervention in traffic control. The criteria to be met do not apply here.

response	Accepted

The training for instructors is reviewed and new AMC will be proposed.

comment	25	comment by: *ENAC ACTO Program Director*

The proposed changes to introduce the concept of CBTA for the training of coaches and assessors are understood in principle but should include differentiations in the behaviour to be observed and competence concerning safety (ref. 2. Safety and efficiency management - Ensure safety and efficiency of the operations during training)

response	Accepted

The training for instructors has been reviewed and new AMC is proposed.

comment	135	comment by: *GdF*

It should be a GM to the proposed AMC.

response	Noted

During the drafting phase, the expert group decided that the competencies and OBs shall be established at AMC level.

comment	391	comment by: *FABEC TTF*

The proposed changes to introduce the concept of CBTA for the training of coaches and assessors are understood in principle but should include differentiations in the behaviour to be observed and competence concerning safety (ref. 2. Safety and efficiency management - Ensure safety and efficiency of the operation during training). An instructor working in a simulation environment is subject to different conditions regarding immediate intervention in traffic control. The criteria to be met do not apply here.

response	Accepted

The training for instructors has been reviewed and new AMC is proposed.

comment	447 ❖	comment by: *DSNA chief of ATCO training program*

DSnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response	Partially accepted

The adapted competency models for unit training shall be developed by the training organisations locally.
Regarding AMC2 ATCO.D.090, the training for instructors will be reviewed and new AMC will be proposed.

comment	635	comment by: *European Transport Workers Federation - ETF*

Having this as an AMC is overly prescriptive.

response	Noted

The details offer a minimum to be implemented for the initial training for the practical instructors. This has been considered as useful and follows the same approach as with the other modifications to the regulation.

ATCO.D.087 Principles for competency-based training and assessment for practical instructors and assessors

p. 82

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comment | *29* | comment by: *ENAC ACTO Program Director*

ATCO.D.087 (b)(5) The listed requirement already implies an occurrence concerning a student's (undesired) behaviour. It would be more desirable for coaches to take corrective action during the training. Therefore, the wording should be: "ensures that the student adopts a positive and professional attitude.

response | Accepted

The text in ATCO.D.087 (b)(5) is modified for clarity.

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comment | *134* | comment by: *GdF*

In line with our previous proposals, we propose to remove the details from the IR and move it to AMC.

IR:
"The training for practical instructors and assessors shall be conducted in a competency-based environment."

AMC:
"(a) The training for practical instructors and assessors in a competency-based environment should ensure that they:
(1) fully understand the principles of competency-based training and assessment;
(2) have detailed knowledge of the adapted competency model and the processes for assessing competence.

(b) In a competency-based environment, a practical instructor should:
(1) instruct on the basis of the training plan and associated training materials;
(2) understand the merits of, and provide timely and continuous feedback on, trainee performance;
(3) use the adapted competency model to diagnose the root cause(s) of performance difficulties;
(4) recognise the challenges associated with instructing and diagnosing deficiencies in the cognitive processes;
(5) manage issues related to attitude.

(c) In a competency-based environment, the assessor should:
(1) gather evidence of competent performance through practical observations (and any associated interviews);

(2) analyse all the evidence to determine if the trainees' performance demonstrates that they have acquired or maintained the competencies detailed in the adapted competency model;

(3) be able to assess an integrated performance and, at the same time, evaluate the performance of separate competencies;

(4) conduct assessment(s) by gathering evidence of competent performance;

(5) debrief the trainees in a manner that will aid their progress."

Additionally, this could be split into different AMCs.

For additional reasoning, see comment 172.

response	Noted

This an AMC applying an approach similar to the one for initial training, unit training, etc. The principles have been agreed to be included in the IR, while the competencies and OBs in the AMC.

comment	*341*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

ATCO.D.087 (b)(5) The listed requirement already implies an occurrence concerning a student's (undesired) behaviour. It would be more desirable for coaches to take corrective action during the training. Therefore, the wording should be: "ensures that the student adopts a positive and professional attitude.

response	Accepted

The text in ATCO.D.087 (b)(5) is modified for clarity.

comment	*393*	comment by: *FABEC TTF*

The listed requirement already implies an occurrence concerning a student's (undesired) behaviour. It would be more desirable for coaches to take corrective action during the training. Therefore, the wording should be: "ensures that the student adopts a positive and professional attitude.

Implementation

Some organisations have fundamental questions about the implementation of CBTA:

As it is intended to be published in the AMC and not GM, an implementation obviously must be entirely done. Even organisations that already use CBTA, but not in this completeness, must train staff and adapt the entire documentation or the application(s) used.

This change takes time! There is the question of how much time will be given to the training organisations after the signature of the Commission President.

The initial training organisations have questions about the practical implementation:

For example, is it necessary to assess the competencies, or is it necessary to assess all the observable behaviours?

Whereas ICAO doc 10056 provides flexibility to amend the observable behaviour, the entry in the AMC is considered binding, unless alternative means of compliance are requested and approved.

Since ICAO document 10056 describes that an overall assessment must be made as follows:

»The overall assessment of 'competent' for the standard of competence being assessed can only be made if all performance criteria have been achieved.«

Some organisations consider it problematic when they run many simulations daily, and instructors must write a report after each exercise, in which all 50 to 60 sub-elements must be addressed.

If this requires a change of 'training/assessment setup', a lot of time is needed for full implementation.

Benchmark
In the course of this consideration, TTF members expressed the wish to benchmark the current UCS figures (minimum hours per unit endorsement).

response	Accepted
	The text in ATCO.D.087 (b)(5) is modified for clarity.

AMC1 ATCO.D.095(a)(1) Training of assessors   p. 86

comment	*136*	comment by: *GdF*
	It should be a GM to the proposed AMC.	
response	Noted	
	During the drafting phase, the expert group decided that the competencies and OBs shall be established at AMC level.	

comment	*385*	comment by: *FABEC TTF*
	Performance objectives are not used anymore (competencies and observable behaviours, performance criteria).	
response	Accepted	

comment	*447* ❖	comment by: *DSNA chief of ATCO training program*
	DSnA : Question as how to implement CBTA and new Unit Training Plans	

Explanation :

This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :

We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response | Partially accepted

The adapted competency models for unit training shall be developed by the training organisations locally.

Regarding AMC2 ATCO.D.090, the training for instructors will be reviewed and new AMC will be proposed.

AMC2 ATCO.D.090(a)(1) Training of practical instructors   p. 89

comment | *339*   comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

The proposed changes to introduce the concept of CBTA for the training of practical instructors and assessors are understood in principle but should include differentiations in the behaviours to be observed and competence concerning safety (ref. 2. Safety and efficiency management - Ensure safety and efficiency of the operations during training).

response | Accepted

The training for instructors and assessors will be reviewed and new AMC will be proposed to better reflect the situations.

comment | *340*   comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Observable Behaviours OB 2.1 +
OB 2.2 =>
An instructor working in a simulation environment is subject to different conditions regarding immediate intervention in traffic control. The criteria to be met do not apply here.

response | Accepted

The training for instructors and assessors is reviewed and new AMC to better reflect the situations will be proposed.

| comment | 447 ❖ | comment by: *DSNA chief of ATCO training program* |

DSnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

| response | Partially accepted |

The adapted competency models for unit training shall be developed by the training organisations locally.
Regarding AMC2 ATCO.D.090, the training for instructors is reviewed and new AMC are proposed.

APPENDIX 7 OF ANNEX I   p. 122

| comment | 27 | comment by: *ENAC ACTO Program Director* |

Topics and sub-topics are very structuring for our training courses, and cannot be changed without a very clear process, as it is done in an NPA change process. Topics and sub-topics should remain in Appendices. In any case, changes must be modified with public consultation only.

| response | Noted |

The rulemaking procedure remains applicable to AMC material as well.

| comment | 342 | comment by: *Direction de la sécurité de l'aviation civile (DSAC)* |

Topics and sub-topics are very structuring for our training courses, and cannot be changed without a very clear process, as it is done in an NPA change process.
Topics and sub-topics should remain in Appendices. In any case, changes must be modified with public consultation only.

response	Noted
	The rulemaking procedure remains applicable to AMC material as well.

comment	*380*	comment by: *SNCTA member of ATCEUC*
	Harmonization of ATCO initial training at EU level is considered as important and necessary for future of EU ATM. A proper definition of topics and sub-topics is essential to have future professional ATCOs well formed, trained with a good level of knowledge. ATM community including staff representative organisations needs to be involved in the process. Actual NPA process for changes in topics and subtopics should remain.	
response	Noted The rulemaking procedure remains applicable to AMC material as well.	

AMC1 ATCO.OR.C.001(d) Management system of training organisations   p. 129

comment	*90*	comment by: *GdF*
	Request GM on point (g) on how to demonstrate the knowledge. What would satisfy this requirement? Should the STDI instructors take a regular tests? Would it be enough to show the curriculum? Please specify.	
response	Accepted GM has already been proposed on how knowledge on current operational practices may be achieved, but it has been placed in ATCO.C.040 (Validity of STDI endorsement) and ATCO.C.060 (Validity of assessor endorsement).	

AMC1 ATCO.OR.C.015(a) Facilities and equipment   p. 130

comment	*295*	comment by: *EUROCONTROL*
	AMC1 ATCO.OR.C.015(a) Facilities and equipment and GM1 ATCO.OR.C.015(a) Facilities and equipment Agree, more concise and looks neater.	
response	Noted	

comment	*343*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	AMC1.ATCO.OR.C.015(b)(b) states:	

"Training organisations should demonstrate how the STD will provide adequate support for the intended training, in particular, how the STD will meet the stated objectives of the practical training exercises and enable the performance objectives to be evaluated to the level determined in the training programme."
However, the term "performance objective" has been deleted throughout the NPA 2023-02 and replaced by "competency", so to make the text consistent replace this "performance objectives" by "competencies".

response	Noted

comment	467	comment by: *IAA*

(1) high-fidelity simulator (HI FI SIM) A replica of controller ==pork== positions (CWPs) including all equipment (hardware, software and connectivity) enabling full functioning/ interaction of the CWP and their environment. In the case of aerodrome training (ADC), it includes an out-of-the-tower view.

Suggest change to `controller working positions (CWPs)'

(2) simulator (SIM); A device which presents the ==trainee== with important features of the real situation and reproduces operational

The use of 'trainee' in this AMC does not appear consistent with term 'learner' throughout the regulation.

response	Not accepted

This terminology was agreed and is in line with Eurocontrol document ref. HUM.ET1.ST07.3000-REP-02.

comment	636	comment by: *European Transport Workers Federation - ETF*

(b) is needed : not ok to delete !

response	Not accepted

The intent behind the revised rule is to broaden the possibilities for delivering training, not to limit it solely to physical classrooms. The inclusion of 'sufficient suitably equipped classroom areas' in the original text inadvertently suggested a requirement for traditional, in-person training environments.

AMC1 ATCO.OR.C.015(b) Facilities and equipment   p. 131

comment	31	comment by: *ENAC ACTO Program Director*

Performance objectives are not used anymore (competencies and observable behaviours, performance criteria).

response	Accepted

comment	70 ❖	comment by: *LFV*

AMC2 ATCO.D.055(b)6 + GM1 ATCO.D.060(a)2 b + AMC1 ATCO.OR.C015(b) c

It is a bit unclear with these three different paragraphs on how to count time. Per definition, counting hours only on position is contradicting the concept of CBT.
Just using STD for "situations unlikely to be encountered" is to close the opportunity for a student to practice also normal procedures as repetition and preparation at units with low traffic.

response | Noted

AMC2 ATCO.D.055(b)(6) has been deleted. GM1 ATCO.D.060(a)(2) indicates that the training that can be counted as part of operational training is training for procedures unlikely to be encountered in the operational environment during the training. The opportunity for a student to practise normal procedures using STDs is still available, it is just that this training cannot be counted as on-the-job-training.

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comment | 91 | comment by: *GdF*

While we agree that a Hi-Fi Sim is not required for the initial training, it should not be ruled out. Please add this option to the table in (a).

response | Partially accepted

As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents HIFI from being used in initial training.

---

comment | 92 | comment by: *GdF*

Request to add (d): "If any digital equipment is employed to replicate a task within the ATS that would typically be performed by a human (e.g., radio communication), the training organization must ensure that the training quality is maintained at a level equal to or higher than that achieved through human intervention."

The purpose of this request is to ensure that the training remains of the highest possible quality and that trainees do not experience any hindrance or delay in their learning process.

response | Not accepted

The modified rule in ATCO.OR.D.001, together with associated AMC, already adequately address concerns related to the use of digital equipment in training.

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comment | 108 | comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

AMC1 ATCO.OR.C.015(b) Facilities and equipment a) 'the table', page 131
The table in the AMC have the characteristics of a GM. To put a guidance table in an AMC, excludes for instance PTT that could be a very useful tool for specific tasks trained   during   unit   training.

response | Partially accepted

As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents PTT from being used in unit training.

comment	109	comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

AMC1 ATCO.OR.C.015(b) Facilities and equipment a), page 131-132
Since HIFI SIM is new, it could be useful to have the criteria for STD updated and more distinguished between the different STD's.

response	Noted

This was exactly the intent of this AMC: to provide additional details on the classification and the use of STDI.

comment	166	comment by: *German NSA (BAF)*

"A replica of controller pork positions (CWPs) including"

Proposal: "A replica of controller work positions (CWPs) including"

response	Accepted

comment	212	comment by: *Air Traffic Control the Netherlands*

Regarding the text "*In the case of aerodrome training (ADC), it includes an out-of-the-tower view*":
Please clarify: whether a training on an non out of the tower view simulator is still possible on top of the out of the tower view simulator, while the assessment still will be on an out of the tower view simulator.

response	Not accepted

The text represents the definition of what is a HI FI SIM and does not introduce any limitation or additional provision on the way training and assessment should be performed.

comment	296	comment by: *EUROCONTROL*

AMC1 ATCO.OR.C.015(b) Facilities and equipment - Agree

response	Noted

comment	297	comment by: *EUROCONTROL*

Rationale – AMC1 ATCO.OR.C.015(b) - Agree

response	Noted

comment	312	comment by: *EUROCONTROL*

AMC1 ATCO.OR.C.015(b) Facilities and equipment

(c) STD used for ~~pre~~-on-the-job training
And the rationale (which references C.015 (b) but I think is meant to be (c)

Comment:
It is unclear whether the training hours credited on an STD may be counted towards the minimum experience requirements of ICAO Annex 1 (i.e. 90 or 180 hours)?

response	Noted
	The hours can be counted.

comment	*313*	comment by: *EUROCONTROL*

AMC1 ATCO.OR.C.015(b) Facilities and equipment
(c) STD used for ~~pre~~-on-the-job training

Clarification required:
With this deletion any STD could be used for pre-OJT? Have nothing against a better description and rationale for the OJT part introduced but the notion of the need for HI FI SIM in the pre-OJT is lost!

response	Noted
	Any STD could be used during pre-OJT, however only if a HI FI SIM is used, then the training time can be counted as operational training.

comment	*344*	comment by: *Direction de la sécurité de l'aviation civile (DSAC)*

Use of part-task trainer (PTT)

Use of part-task trainer (PTT) must not be excluded.
DGAC FR believes that there is an error in the table that shall be corrected or at least clarify :
- How should the table and "best usage" on page 131 be interpreted?
- Is there a contradiction between page 12 and page 131 on this point?

response	Partially accepted
	As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents PTT from being used in any phase of training.

comment	*363*	comment by: *TO Austro Control*

……..:
(1) high-fidelity simulator (HI FI SIM)
A replica of controller ~~pork~~ **work** positions (CWPs) including all equipment (hardware, software and connectivity) enabling full functioning/interaction of the CWP and their environment. In the case of aerodrome training (ADC), it includes an out-of-the-tower view.

The table below….:

We suggest to add the possibility to use HI FI Simulators also for instructor and assessor training

response	Partially accepted
	As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents HIFI from being used for assessor and instructor training. We agree with the word replacement.

comment	*367*	comment by: *EPN*

With the text "replica" and "enabling full functioning".. there is a risk that this may be interpreted as no deviations (even minor) are acceptable.
A full replica is to be considered as the system itself but maybe as a back-up / contingency position.

Suggest "Hi-fidelity simulator: A simulator that is capable of replicating the essential functionalities of an Operational Unit Position".

or

High-Fidelity Simulator (HI FI SIM):

A synthetic training device that simulates of the Controller working positions (CWP's) features and equipment (Hardware, software and connectivity), enabling the essential functions/interactions of the CWP and their environment. In the case of aerodrome training (ADC), it includes an out-of the-tower simulated view.

response	Not accepted
	This terminology was agreed and is in line with Eurocontrol document ref. HUM.ET1.ST07.3000-REP-02.

comment	*386*	comment by: *FABEC TTF*
	Performance objectives are not used anymore (competencies and observable behaviours, performance criteria).	

response	Accepted

comment	*637*	comment by: *European Transport Workers Federation - ETF*
	Glad to see the outrageous typo has been corrected. We believe a PTT should be authorised for unit training as well (in the table and in paragraph (c)).	

response	Partially accepted
	As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents HIFI from being used for assessor and instructor training.

comment	*655*	comment by: *NSA Austria*
	AMC1 ATCO.OR.C.015(b) Facilities and equipment (3) ……..: (1) high-fidelity simulator (HI FI SIM) A replica of controller ~~pork~~ **work** positions (CWPs) including all equipment (hardware, software and connectivity) enabling full functioning/interaction of the CWP and their environment. In the case of aerodrome training (ADC), it includes an out-of-the-tower view. The table below….: **We suggest to add the possibility to use HI FI Simulators also for instructor and assessor training**	
response	Partially accepted As the title of the table mentions, it is an indication for the best usage of simulators and nothing prevents HIFI from being used for assessor and instructor training.	

ATCO.OR.D.001 Requirements for training courses and training plans   p. 133

comment	*137*	comment by: *GdF*
	"When STDs are used for distance learning, it has to be ensured that the training objectives are met without on-site personal guidance." We are highly sceptical of STD used for distance learning. While it is nice to have this requirement at IR level, we would like an AMC detailing how this has to be ensured.	
response	Not accepted During the COVID pandemic, MUAC used STDs for distance learning.	

AMC1 ATCO.OR.D.001 Requirements for training courses and training plans   p. 133

comment	*277*	comment by: *BCAA*
	What is understood under "the training material"? Some training material might be explained in a course but not made available for good reasons (e.g. when discussing specific occurrences).	
response	Noted	

GM1 ATCO.OR.D.001 Requirements for training courses and training plans   p. 134

comment	*93* comment by: *GdF*
	Request to elevate to AMC-level to ensure harmonized application.
response	Accepted

comment	*638* comment by: *European Transport Workers Federation - ETF*
	The availability of a human to answer questions stemming from remote learning should be included.
response	Not accepted
	This AMC does not provide for any other interactions than those between humans.

ANNEX II - PART ATCO.AR - REQUIREMENTS FOR COMPETENT AUTHORITIES   p. 135

comment	*458* comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Particular attention must be paid to the training of Authority inspectors, who will be responsible for approving ATCO training programs in the new CBTA format. Requirements for competent authorities in Annex II (Part ATCO.AR) must be developed. Particularly standards for CBTA oversight activities as well as qualification criteria for the involved inspectors from competent authorities will need to be developed.These additional provisions will address the specificities of approval and oversight processes with regard to CBTA.
response	Noted

comment	*459* ❖ comment by: *Direction de la sécurité de l'aviation civile (DSAC)*
	Particular attention must be paid to the training of Authority inspectors, who will be responsible for approving ATCO training programs in the new CBTA format. Requirements for competent authorities in Annex II (Part ATCO.AR) must be developed. Particularly standards for CBTA oversight activities as well as qualification criteria for the involved inspectors from competent authorities will need to be developed.These additional provisions will address the specificities of approval and oversight processes with regard to CBTA.
response	Noted

COMMISSION DELEGATED REGULATION (EU) .../...   p. 143

comment	*167* comment by: *German NSA (BAF)*

Article 1 (1) (c)

Proposal: Add AMC/GM "Medical certification should be done either through an initial assessment performed by a certified AeMC or by renewal/revalidation though an AME, if applicable (e.g. for ex-pats retuning to Europe) to reduce the administrative burden to exchange medical files with third countries".

response	Accepted
	Reference is added to ensure compliance with Part ATCO.MED.

comment	*168*	comment by: *German NSA (BAF)*

Article 1 (1) (d)

Proposal: Add AMC/GM "language assessment should be done through an initial assessment performed by a certified LTO or by renewal/revalidation though a LTO, if applicable (e.g. for ex-pats retuning to Europe) to reduce the administrative burden to exchange information on language testing criteria with third countries".

response	Partially accepted
	Language assessment bodies in the EU are not certified. The text has however been modified to clarify the obligation of the applicant to meet the relevant EU requirements when complying with the language proficiency requirements.

comment	*169*	comment by: *German NSA (BAF)*

Article 1 (2)

There is no reference to a rule or rule-making addressing who covers the costs of such a procedure. Is it intended to be handled according to the respective national implementation of Directive 2005/36/EC? In this case a hint via GM would be appreciated.

response	Accepted
	The proposal is reformulated to place the obligation on the applicant.

comment	*170*	comment by: *German NSA (BAF)*

Article 1 (2)

"in accordance with Commission Regulation (EU) 2015/340 to assess the applicant's compliance"

Proposal: "in accordance with Commission Regulation (EU) 2015/340 to evaluate the applicant's compliance"
Rationale: According to the revised/more detailed definition of "assessment" the word assess would not cover the whole procedure that is needed. "Evaluate" would be more appropriate.

response	Accepted

The proposal has been reformulated to avoid confusion.

| comment | *171* | comment by: *German NSA (BAF)* |

Article 1 (3) (e)

"include copies of all relevant supporting documentation, including copies of the relevant third-country requirements and procedures, demonstrating how the training organisation has established the elements listed in points (a) to (d) above."

Does the rule intend to make training organisations responsible for collecting (regulatory) documents from third countries? The application to convert a third country license reaches the NCA first and should already include the mentioned documentation of the regulatory environment the applicant comes from or this documentation can be requested by the NCA from the third-county authority based on common ICAO procedures. One could argue that a compliance check between EU and third country rules (cf. Article 1 (3) (a)) should rather be done by the NCA for the purpose of harmonisation of the procedure as well as reducing costs by having one compliance list per country instead of doing it for each individual – this would also be more in line eith the approach to conversion reports done for military ATCOs.

| response | Accepted |

The proposal is reformulated to place the obligation on the applicant.

| comment | *298* | comment by: *EUROCONTROL* |

COMMISSION DELEGATED REGULATION (EU) .../...
1 (a) is at least
The proposed delegated regulation addresses the conversion of ATCO licences issued in compliance with the requirements of ICAO Annex 1 to the Chicago Convention by a third country. Thus, it is undestood that the matter is about a third country licensed ATCO converting to an EU student licence.

ICAO Annex 1 requires a person to be at least 21 years old before he/she could be licensed as ATCO.
In that context, the applicant would always be over 18 years old. However, as the proposed wording is, at the moment, 18 years old. There is a trap that an EU licence might be issued to an underage person18 years old;

Check ICAO Annex 1 if a person needs to be at least 21 years old to be issued with an ATCO licence. Make sure the new EU regulation is aligned.

| response | Not accepted |

The acceptance could result in the issue of a student ATCO licence in accordance with Commission Regulation (EU) 2015/340, for which the age limit is 18 years.

| comment | *314* | comment by: *EUROCONTROL* |

Acceptance of third-country certification of air traffic

	Controllers Article 1 (1) (a) is at least 18 years old. Clarification required: Is it stated anywhere that 18 years is OK for the student licence but for the issue of the ATO Licence, the person must be at least 21 years old?
response	Noted Once the person is issued with a student ATCO licence in accordance with Commission Regulation (EU) 2015/340, for which the age limit of 18 years applies, there is no further age limit to be observed within the EU context.

comment	*456*	comment by: *AESA*
	1) There is a definition for National Conversion Report but in the text only appears the noun "conversion report". Should a new definition be established due to this new approach to the conversion report? 2) Could other Conversion reports from initial training schools certified by other Member States be recognized or just inital training schools from the MS? 3) We don't agree with the procedure established for the conversion. It sounds strange that the Authority must select a training organisation to do that. Wouldn't it be better that the applicant could ask a TO directly and then address the request with the report to the Authority? For us, as an Authority, it is not easy to select one TO. This activity could originate new incomes for the TOs and could derive into competition between TOs. Perhaps, it could be considered that the Authority could make comments on the request received from the applicant.	
response	Accepted The proposal has been reformulated to avoid confusion.	

comment	*639*	comment by: *European Transport Workers Federation - ETF*
	This should include a condition of a reciprocity clause.	
response	Noted	

4. Proposed actions to support implementation   p. 145

comment	*640*	comment by: *European Transport Workers Federation - ETF*
	Consideration is not proposing an action...	
response	Noted	

6. Quality of the NPA   p. 147

comment	*138*	comment by: *GdF*
	Retracted, because I'm worried about the leaking of my information in CRD 2022-04.	

response	Noted

comment	*306*	comment by: *EUROCONTROL*

Note: Your comments on Chapter 7 will be…
Where is Chapter 7?

response	Accepted

The correct reference is Chapter 6.

6.1. The regulatory proposal is of technically good/high quality   p. 147

comment	*139*	comment by: *GdF*

Retracted, because I'm worried about the leaking of my information in CRD 2022-04.

response	Noted

comment	*300*	comment by: *EUROCONTROL*

6.1. The regulatory proposal is of technically good/high quality - Agree

response	Accepted

comment	*368*	comment by: *EPN*

Fully Agree

response	Accepted

comment	*446* ❖	comment by: *DSNA chief of ATCO training program*

DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response	Accepted

6.2. The text is clear, readable and understandable
p. 147

comment	*140*	comment by: *GdF*
	Retracted, because I'm worried about the leaking of my information in CRD 2022-04.	
response	Noted	

comment	*301*	comment by: *EUROCONTROL*
	6.2 The text is clear, readable and understandable - Agree	
response	Accepted	

comment	*369*	comment by: *EPN*
	Agree	
response	Accepted	

comment	*446* ❖	comment by: *DSNA chief of ATCO training program*
	DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice. | |
| response | Accepted | |

comment	*447* ❖	comment by: *DSNA chief of ATCO training program*

DSnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response	Partially accepted
	The adapted competency models for unit training shall be developed by the training organisations locally. Regarding AMC2 ATCO.D.090, the training for instructors is reviewed and new AMCs are proposed.

6.3. The regulatory proposal is well substantiated   p. 147

comment	*141*	comment by: *GdF*
	Retracted, because I'm worried about the leaking of my information in CRD 2022-04.	
response	Noted	

comment	*302*	comment by: *EUROCONTROL*
	6.3. The regulatory proposal is well substantiated -Neutral	
response	Noted	

comment	*370*	comment by: *EPN*
	Fully Agree	
response	Accepted	

comment	*446* ❖	comment by: *DSNA chief of ATCO training program*
	DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period	

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response	Accepted

6.4. The regulatory proposal is fit for purpose (capable of achieving the objectives set)   p. 147

comment	*142*	comment by: *GdF*
	Retracted, because I'm worried about the leaking of my information in CRD 2022-04.	
response	Noted	

comment	*303*	comment by: *EUROCONTROL*
	6.4. The regulatory proposal is fit for purpose - Agree	
response	Accepted	

comment	*371*	comment by: *EPN*
	Agree	
response	Accepted	

comment	*447* ❖	comment by: *DSNA chief of ATCO training program*

DSnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by

regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response | Partially accepted

The adapted competency models for unit training shall be developed by the training organisations locally.
Regarding AMC2 ATCO.D.090, the training for instructors is reviewed and new AMCs are proposed.

6.5. The impact assessment (IA), as well as its qualitative and quantitative data, is of high quality

p. 147

| comment | *143* | comment by: *GdF* |

Retracted, because I'm worried about the leaking of my information in CRD 2022-04.

response | Noted

| comment | *304* | comment by: *EUROCONTROL* |

6.5 The impact assessment (IA), as well as its qualitative and quantitative data, is of high quality - This is an optimistic statement.
Scarce data both qualitative or quantitative and very little information about the sources of this scarce data.

response | Noted

| comment | *372* | comment by: *EPN* |

Agree

response | Accepted

| comment | *446* ❖ | comment by: *DSNA chief of ATCO training program* |

DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in

the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response	Accepted

6.6. The regulatory proposal applies the 'better regulation' principles
p. 147

comment	144	comment by: *GdF*
	Retracted, because I'm worried about the leaking of my information in CRD 2022-04.	
response	Noted	

comment	305	comment by: *EUROCONTROL*
	According to https://commission.europa.eu/law/law-making-process/planning-and-proposing-law/better-regulation_en the Objectives of the Better Regulation are • Ensure EU policymaking is based on evidence – Disagree • Making EU laws simpler and better, and avoiding unnecessary burdens – Agree • Involving citizens, businesses and stakeholders in the decision-making process – Agree The purpose of the NPA is correct but fails to abide to the first objective of better regulation because: · Both qualitative and quantitative data are scarce and There is very little information about the sources of this scarce data.	
response	Noted	

comment	373	comment by: *EPN*
	Fully Agree	
response	Accepted	

comment	446 ❖	comment by: *DSNA chief of ATCO training program*
	DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period	

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere.   DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response | Accepted

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comment | *447* ❖   comment by: *DSNA chief of ATCO training program*

DSnA : Question as how to implement CBTA and new Unit Training Plans

Explanation :
This comment is on all NPA but more precisely on, for example, ATCO D090 and OBS :
We do wish a common level of ATCO competency is to be reached over Europe. Nevertheless, having a precised list raises the question of ressources and opportunity if this list (of OB) is detailed in hard law. What if one of the item is not reached but does never interest an ANSP ? We suggest this list to be asked by regulation but defined locally or else to have a pourcentage of the list to deal with but not the entire list. This suggestion implies the removal of OB6.2 in the AMC2-ATCO D.090 competency number 6. Is our understanding correct ?

response | Partially accepted

The adapted competency models for unit training shall be developed by the training organisations locally.
Regarding AMC2 ATCO.D.090, the training for instructors is reviewed and new AMCs are proposed.

6.7. Any other comments on the quality of this NPA (please specify)   p. 147

comment | *374*   comment by: *EPN*

We are happy to see the European Aviation Industry is considered mature enough to implement CBTA. This is a positive step and a step in the right direction and further development, quality and efficiency.

response	Accepted

comment	**446** ❖	comment by: *DSNA chief of ATCO training program*

DSNA Proposition : reformulate CBT&A with an aim to fulfill the regulation with a 5 years transition period

Explanation :
We thought CBTA was only going to concern initial training in the introduction but adding CBTA to all instructor and assessors and using competency in unit training plan is enforcing CBTA everywhere. DSNA is unable to put that into place in the current period. Our training teams are facing other safety, economical and ecological issues that implies all our human ressources. We can't get all our unit and continuous training plans fully CBTA-compliant in the next five years, we first need to get the modernisation of our systems fulfilled (security), train and qualify a increasing amont of ATCO (big wave of retirement to overcome), and focus on continuous descent and ecological issues. This work needs to be done after modernisation to avoid having to do it twice.

response	Accepted

3.   Appendix — Attachments

trng-10.6.1.pdf
Attachment #1 to comment [#183](#183)

[1044.pdf](1044.pdf)
Attachment #2 to comment [#366](#366)