



RELATED NPA: 2021-08(A) — RELATED OPINION: NO 06/2022 — RMT.0668

1.9.2022

Table of contents

1. Summary of the outcome of the consultation	2
2. Individual comments and responses	3
3. Attachments	121



1. Summary of the outcome of the consultation

Please refer to Section 2.4 of the related Opinion No 06/2022.



2. Individual comments and responses

In responding to the comments, the following terminology is applied to attest EASA's position:

- (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.

CRD table of comments, responses and resulting text

(General Comments)	-
--------------------	---

comment	1	comment by: <i>AOPA Sweden</i>
	<p>From AOPA Sweden</p> <p>NPA 2021-08</p> <p>AOPA Sweden do not have any objections to the referred NPA</p> <p>Stockholm 21-06-24</p> <p>AOPA Sweden</p> <p>Fredrik Brandel member of the board</p>	
response	<i>Noted</i>	

comment	19	comment by: <i>ENAIRE</i>
	<p>ENAIRE welcomes the modifications included in annex I section C especially in ATCO.C.020 and the integration of TCL in APS and ACS. Although we are concerned of the difficulty and the effort needed for any change in a EU regulation, it would have been a good opportunity to clarify some terms included in the regulation like: immediately, revocation, suspension, exercise the privileges of a license...</p>	
response	<i>Noted</i>	



The commentator is asked to provide additional clarification on the terms used in their dictionary meaning and the context, in which cases those terms cause interpretation difficulties and would therefore merit a specific definition.

comment 35 comment by: *Civil Aviation Authority the Netherlands*

The Ministry of Infrastructure and Water Management and the CAA-NL are happy to see that the issues that had been raised over the past 2 years have been addressed.

response *Noted*

comment 74 comment by: *CANSO*

The general result of streamlining qualifications by aligning ratings and reducing the number of existing endorsements, is that basic required knowledge is being further reduced. The initial training is a bare minimum and causes that the unit training needs to be extended especially for complex airspace situations where nowadays the endorsements are required.

This causes an extra ATCO workload, and thus ATCO manpower need, for these ANSPs with complex airspace. These ANSPs have already a problem recruiting enough ATCO for the operational tasks only. A solution could already be to create a legally vested generic practical training after the initial training and before the unit training. This training would induce the required minimum competences for being able to work in complex environments. This problem is for example already covered by a kind of pre-transitional training organised in MUAC and skeyes. It would guarantee the recruiting ANSP that the ATCO has the required level of competency for a complex environment. This proof of successful participation to the vested generic practical training would provide to the recruiting TO a standardised framework which will ease the work to determine the required conversion training. This generic complexity training could streamline the required conversion training and by this enhance ATCO mobility because of transparency in training trajectory.

There is a dedicated competent authority assigned for the issue, suspension and revocation of the licence required to exercise the privilege of the licence. It is not clearly defined that the competent authority for the issue, suspension and revocation of the medical certificate is a different entity.

But as they have another role and responsibilities, they should be complete separated working institutions. It is not only a question of roles and responsibilities but also about privacy in medical dossier and obligations towards the GDPR regulation. The competent authority responsible for the issue of the medical certificate should separately be described in part MED. And it is obvious that the medical competent authority must inform the licence competent authority and the ANSP of the issue, suspension or revocation of a medical certificate.

response *Noted*



The streamlining of qualifications does not reduce basic required knowledge. The removal of AIR, GMC and TWR rating endorsements does not constitute any change in the training, as training for these endorsements continues to be part of the aerodrome control rating training course (initial training). Training for the SUR rating endorsement can be provided in a similar manner as before for the RAD endorsement by both the initial and unit training organisations, and training for ground movement surveillance and terminal control will become part of the unit training.

RMG.0668 is currently working on further harmonisation of the initial training output to ensure that the students will be able to handle complex and dense traffic situations. This will ensure a standardised level which will ease the work of the recruiting ANSP to determine the required unit training. A standardised level corresponds to a predictable level but it is recognised that the most busy and complex units will require additional training. EASA does however not see any need to complicate the training system further by introducing any legally vested generic practical training after the initial training and before the unit training. This should be part of the unit training.

As for the competent authority for the issue, suspension and revocation of the medical certificate, please refer to the response provided to comment #137.

comment	84	comment by: CAA CZ
	<p>Proposed amendment of the Commission Decision (EU) 2015/340 does not address the possibility for recognition of the ATCL /ATCSL Licences from non-member states. A more detailed justification of this position is presented in the specific comments that follow, along with recommendations on the approach to be taken for their resolution.</p>	
response	<p><i>Noted</i></p> <p>The recognition of third-country ATCO licences under Regulation (EU) 2015/340 is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.</p>	

comment	86	comment by: LBA
	<p>The LBA has no comments</p>	
response	<p><i>Noted</i></p>	

comment	143	comment by: CANSO
---------	-----	-------------------



response	<p>Along the text the three words examinations, evaluation and assessment are used in different ways and different situations. Those need to be clarified and the text needs simplification in that matter.</p> <p><i>Noted</i></p> <p>Please refer to the response provided to comment #197.</p>
comment	<p>144 comment by: <i>CANSO</i></p> <p>The new ratings tend to clarify some situations and clarification is good. Changing the whole license process will definitely take a lot of time and work for both ANSP and NSAs. DSNA is asking EASA to take that working schedule in consideration as far as further projects are announced and secure every change and project concerning ATCOs Licensing.</p>
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #198.</p>
comment	<p>143 comment by: <i>DSNA/SDRH</i></p> <p>Along the text the three words examinations, evaluation and assessment are used in different ways and different situations. Those need to be clarified and the text needs simplification in that matter.</p>
response	<p><i>Noted</i></p> <p>The terms ‘examination’, ‘evaluation’ and ‘assessment’ are currently under review and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.</p>
comment	<p>198 comment by: <i>DSNA/SDRH</i></p> <p>The new ratings tend to clarify some situations and clarification is good. Changing the whole license process will definitely take a lot of time and work for both ANSP and NSAs. DSNA is asking EASA to take that working schedule in consideration as far as further projects are announced and secure every change and project concerning ATCOs Licensing.</p>
response	<p><i>Noted</i></p> <p>This is addressed in Article 8 ‘Conversion and inclusion of privileges’ which proposes a 3-year transitional period.</p>

comment	<p>213 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>General Many of the GM's are more like AMC's. Revision of the GM's would be welcomed.</p>
response	<p><i>Noted</i></p> <p>The commentator is asked to provide additional clarification, including the context, on the guidance material considered to require more binding and therefore should be elevated to AMC.</p>

comment	<p>220 comment by: <i>French DGAC</i></p> <p>GENERAL COMMENTS</p> <p>1° Per article 3 (3) of regulation 2015/340, we currently issue European ATCO licences to military air traffic controllers providing general air traffic services. We need to make sure that the amendment proposed on article 3 will not stop us from doing so. Please see our full comment below.</p> <p>2° As detailed in our comments below, we do not see a simplification value in merging endorsement ratings. The privileges of an ATCO should be apparent by reading ratings and rating endorsements, whereas the proposal suppresses most of the relevant information and deprives the licence of its useful content. We are principally concerned that merging the GMS and RAD endorsement ratings into a SUR rating, and including AIR and GMC endorsement rating in the ADC rating, might end up creating confusion on the privileges applicable, more administrative burden, and IT development costs. Therefore we strongly suggest EASA refrain from this GMS/RAD merging, and reconsider the other proposed merging. For the record, in France we have more than 4000 ATCOs and 130 Units.</p> <p>3° The consultation period included the summer months, therefore consulting all our national stakeholders was not optimal. We wish that in the future EASA refrain from consulting during the summer.</p>
response	<p><i>Noted</i></p> <p>#1 Please refer to the answer provided to your specific comment #251. #2 Please refer to the answer provided to your specific comment #224. #3 The consultation period of this NPA encompassed nearly 3.5 months in order to allow sufficient time (in this case ca. 2 months) for consultation also outside of the summer period.</p>



comment 255

comment by: ATM-PP

Attachment [#1](#)

Having analysed NPA 2021-08, ATCEUC is deeply concerned with the political agenda of EASA: Instead of being a European Union Aviation Safety Agency, protecting the overall wellbeing of the citizens of the European Union, in the NPA it is blatantly obvious that this Institution is blindly following the Economic agenda of a restricted number of stakeholders and not taking Safety as the top priority of its activities.

To support this overall analysis, we urge you to consider the following comments:

“ATCO training has been claimed to be cumbersome, costly and time-consuming partially also due to the fragmented qualification structure.”

(Page 9 of document A of NPA 2021-8)

This claim displays a fundamental failure to appreciate an ATCO’s specific expertise. ATCO training duration is affected by the responsibility and dimension of the Safety-related tasks an ATCO executes at work. The perception of it as *“costly and time-consuming”* is deeply flawed and a purely market and profit-based opinion. It is, therefore, distressing to see this statement proposed by the European Union Agency whose mission should be to watch over European Union Aviation Safety.

“The simplification of the rating and rating endorsement system will establish a lean system of qualifications and provide benefits to the ATCO training organisations as regards the time-intensity and cost-efficiency of the training, while ensuring an equivalent level of safety.”

(Page 9 of document A of NPA 2021-8)

ATCEUC highlights that this sentence shows that it is EASA’s real intention with NPA 2021-8: to promote and ensure the economic interests of the ATCO Training Organisations. Such levels of transparency are welcome, but we can find no technical evidence from EASA to support the second claim made in this sentence. Therefore, ATCEUC asks EASA the following:

Question 1 - Did EASA conduct any detailed studies to support their claim that an *“equivalent level of safety”* will be ensured through the proposed measures in this NPA 2021-8? If so, which stakeholders were involved in that study? What was the ratio of ATCO and ATCO-OJTI qualified professionals in that study?

Moreover, ATCEUC also highlights that no reference is made in this sentence to ANSPs. Changes in the rating and rating endorsement system will have an impact at the Service Providers’ level and, therefore, at the Safety levels of the European ATM System.

“On another issue, implementation feedback received from stakeholders has shown that the current regulatory framework is administratively burdensome when it comes to short-term job relations; for example, in the case of freelance instructors and assessors working for different ATCO training organisations in different Member States.”

(Page 9 of document A of NPA 2021-8)



With this statement, once again, EASA is transparent enough to show everyone which interests are behind this proposed amendment. ATCEUC does not oppose the facilitation of ATCO's mobility between Member States but stating that *"the current regulatory framework is administratively burdensome"* highlights a deliberate ignorance about the rationale of the current framework, which is based on competence and proficiency evidence to guarantee the highest Safety standards. The same applies to the unpopularity of the short-term relations in the ATM Sector: Short-term contracts of employment are rarely used for ATCOs in Europe and ATCEUC does not foresee that to increase significantly in the next decade. Competence and proficiency (even for instructors providing initial training) require time to adapt and master the procedures before applying (or teaching) them. ATCEUC advocates that fostering short-term employments in ATM has a direct impact on the Safety levels (and on the quality of the initial training provided to prospective ATCOs) in the medium term and urges EASA to perform a Human Performance based study on this subject.

"This NPA contains proposals to remove several of the current rating endorsements to simplify the European system and further align with ICAO."

(Page 11 of document A of NPA 2021-8)

ATCEUC follows the intention of alignment with ICAO but highlights that the current rating endorsements' system has a Safety-based rationale behind. Therefore, removing any rating endorsement should be made with the guarantee that the required training associated with that rating endorsement will remain mandatory for the ATCO rating to which such rating endorsement was related. Besides that, deleting the rating ADV has implications in some Member States that have air traffic controllers with this rating solely.

"The general objective of RMT.0668 is to ensure a high and uniform level of safety in air traffic management (ATM)/air navigation services (ANS) (...)"

(Page 11 of document A of NPA 2021-8)

ATCEUC supports the general objective of RMT.0668 but underlines that, unfortunately, the current NPA has an obvious goal that is far from the stated one in this sentence. In fact:

"The specific objectives of this proposal are to simplify the system of ratings and rating endorsements, to facilitate the mobility of instructors, assessors and student ATCOs, to facilitate the licensing of ATCOs in cases of dynamic cross-border sectorisation, and to update and streamline the initial training content to be in line with the latest developments."

(Page 11 of document A of NPA 2021-8)

The specific objectives stated are unrealistic, cannot be implemented and have nothing to do with Safety. It is ATCEUC's belief that the simplifications suggested in this Amendment will endanger the European Skies in the medium term. EASA is suggesting changes in the rating and rating endorsements' system and in the initial training content just to reduce the costs of the initial training and, therefore, creating a market-based training system for ATCOs at European Level. ATCEUC has no information on any Safety Impact assessment study on the proposed changes, and we strongly suggest EASA, in line with its mission as a Safety Agency, to conduct a thorough one before proposing such an Amendment as this to the European



Commission. Needless to say that ATCO representatives must be involved in such a fundamental study.

“2.4.1. Simplify the system of ratings and rating endorsements”

(Page 11 of document A of NPA 2021-8)

ATCEUC supports the rationale of merging the ADI and ADV ratings into a single ADC rating since it is a desired alignment with ICAO. Regarding rating endorsements, ATCEUC also supports merging rating endorsements privileges of TWR, AIR and GMC into the new ADC rating privileges. However, none of this merging processes should decrease the overall objectives of the initial, basic and unit training. To make it clear: ATCEUC accepts the administrative reform of some of the ratings and rating endorsements but condemns any initiative to reduce the duration, goals and/or standards of the current ATCO training framework, since it would most probably affect the current Safety standards observed in the European ATM infrastructure.

“2.4.1.1 Air traffic controller ratings”

(Page 12 of document A of NPA 2021-8)

Regarding Question 1 from EASA, ATCEUC highlights that ACP is needed to guarantee the necessary training to provide Safe Procedural Area Control in a portion of Airspace. Although the vast majority of the European Airspace might be under surveillance in the few years to come, to convert the current ACP privileges into an ACS add-on to cover only contingency situations would only be acceptable if those contingency procedures were to “empty the sky” and not to accept any additional traffic into the portion of Airspace where surveillance systems are unavailable. Regarding this statement ATCEUC highlights that the “empty the sky” rationale was mentioned by EASA representatives in a previous ATM/ANS.TEC meeting.

Furthermore, ATCEUC also highlights that the new surveillance systems that are behind such rationale are outsourced (e.g. space-based ADS-B) and its providers follow a market-based philosophy in their operations. By deleting ACP and accepting that the sudden unavailability of the surveillance service provision means emptying the European Skies for as long as the external company needs to resume its normal operations, EASA is taking a high stakes gamble on a seamless service provision by private entities whose core mission and technical approaches are drastically different from the ANSPs’ proven infrastructural philosophy.

Therefore, ATCEUC sees ACP will be needed from 2023 and beyond, until such time as the newcomers in the ADSP Sector become as resilient, competent and safe as the current ANSP-based systems and share the same basic goals.

“2.4.1.2. Air traffic controller rating endorsements”

“Additional comments addressed the identification of AIR or GMC as limitation in case of the expiry of the unit endorsement and following an exchange of licence. EASA considers however that this is covered by the current requirements on record-keeping and on the exchange of information between competent authorities.”

(Page 13 of document A of NPA 2021-8)

In this consideration EASA contradicts the goal of “simplification” mentioned in this NPA 2021-8 since it adds administrative burden in exchanging details of record-keeping between competent authorities. If the proposed rating system still requires record-keeping and exchange of information between competent authorities in

cases of mobility between Member States, then it is obvious that the proposed rating system is over-simplified.

“The ground movement surveillance (GMS) and aerodrome radar (RAD) rating endorsements are proposed to be merged into one rating endorsement that is called ‘aerodrome control surveillance’ (SUR).”

(Page 13 of document A of NPA 2021-8)

ATCEUC does not agree with the merging of surveillance rating endorsements GMS and RAD into a single SUR, since using Surveillance systems to support ATCOs’ tasks is substantially different when applied at Ground level or Airborne traffic. Therefore, ATCEUC advocates that under the new ADC rating the GMS and SUR rating endorsements shall remain, with the second one referring to the Surveillance competence regarding airborne traffic only.

Regarding Question 2 from EASA, ATCEUC considers that the pressure on airport capacity during the next decade might cause military aerodromes to be converted into civil airports with a military apron. In these cases, military aircraft will be subject to the service provided by civil ATCOs and, therefore, PAR rating should be maintained. Moreover, as mentioned before, ATCEUC supports the alignment of the EASA rating system with the ICAO rating system as far as possible. Having in mind that ICAO maintains such a rating, the same shall occur at EASA level.

“The proposal is that the ICAO location indicator should indicate the unit that manages the ATCO’s competence maintenance. The sectors, airspace or working positions, where the ATCO is competent to provide services, can be further specified in the unit endorsement by using other abbreviations.”

(Page 14 of document A of NPA 2021-8)

ATCEUC is aware of the FINEST project and its potential. However, ATCEUC would expect to see EASA focused on the Safety side of the project rather than the *“flexible resource management”* that the FINEST project aims at. Having this in mind, ATCEUC urges EASA to conduct a proper Human Performance based study on how Safety is affected by the variety of sectors that an ATCO may provide service to within the very same Unit. In the end, with this clarification, EASA might be fostering a project that contradicts the Safety goals of the very own Agency.

“In summary, the TF anticipates that the introduced changes (4 % reduction of Basic training objectives and downgrading to a lower taxonomy level) will contribute to a slight reduction of the duration of the Basic training.”

(Page 16 of document A of NPA 2021-8)

ATCEUC is shocked with the fact that EASA supports the reduction of Basic training objectives and a downgrade to lower taxonomy levels to reduce the duration of Basic training. Again: EASA is not focused on the Safety part of the system. Instead, EASA appears simply to be following an economic agenda of a few stakeholders, disregarding the Safety impact of its proposals. ATCEUC urges EASA to conduct a proper Safety Impact assessment on the mentioned *“reduction of Basic training objectives and downgrading to a lower taxonomy level”*.

“2.5. What are the expected benefits and drawbacks of the proposal”



“The proposed merging of GMS and RAD rating endorsements into one new rating endorsement called SUR corrects the identified deficiency in the regulation not enabling a holder of AIR and RAD endorsements to use aerodrome surface movement guidance systems.”

(Page 18 of document A of NPA 2021-8)

ATCEUC fully disagrees with this EASA statement. GMS and RAD rating endorsements do exist to differentiate two tasks that, although semantically similar, are extremely different to execute. Ground Movement Control aided by Surveillance systems is significantly different from Airborne Traffic Control with similar technological support. Moreover, many European airports have just one of the Surveillance systems available. ATCEUC advocates that GMS and RAD (converted into SUR) shall be maintained.

Regarding the expected benefits of this proposal (Page 19 of document A of NPA 2021-8), ATCEUC highlights the focus on the training organisation benefits and questions the ANSPs benefits. ATCEUC does not believe that *“potential employment shortage being handled more easily thanks to the higher mobility of student ATCOs”* will be observed, since EASA is lowering the Basic training standards to reduce the duration of the Basic training (for no good reason other than protecting training organisations’ bottom line).

Reducing these standards will result in an increased duration of the later Unit training as well as a reduction in the success rate of the Unit training process. Experience shows this will increase the overall training time and an ATCO shortage will still be a problem in the future, since it will always be down to the Human who will need time to acquire the necessary skills and to learn how to handle Air Traffic safely in any Air Traffic Control environment.

Changes in the administrative process at Basic training level will affect the Unit training level. ATCEUC urges EASA to look at the bigger picture when addressing ATCO training and to see the full cycle “from applicant to a qualified ATCO” and its interdependencies.

Regarding the benefits for ATCOs, ATCEUC urges EASA to consider that increased mobility might foster social dumping in the ATM Sector. ATCEUC is not against the increased mobility between Member States but urges EASA to conduct a proper Social Impact assessment on the increased ATCO mobility at European level.

“Considering that this proposal would not have major impacts and/or controversial items, a brief analysis of the main benefits and drawbacks has been included in this section and no detailed impact assessment (IA) has been performed, in accordance with the proportionality principle.”

(Page 19 of document A of NPA 2021-8)

ATCEUC does not agree with EASA's statement that the current NPA 2021-8 has no major impacts and/or controversial items. As one can read in ATCEUC's comments, many proposals may have major impacts, and many more are controversial items. Therefore, a detailed impact assessment shall be performed, with a proper PSO representativity in such study.

AMC 1 ATCO.B.025(a)(3) Unit competence scheme

“The minimum number of hours should be defined in a manner which ensures that the privileges are exercised in all sectors and/or positions covered by the unit endorsements.”



(Page 44 of document A of NPA 2021-8)

ATCEUC is concerned with the various implications of this AMC because it implies a different number of hours depending on the number of sectors of the specific centre. Moreover, during night shift for instance, the number of hours in the combined sectors shall be counted as total or divided by the partial sectors combined at each moment? Still, ATCEUC questions: why change something that is already working properly and creating complex problems for both ATCOs and Authorities? Finally: How shall this be applied in cases like the FINEST project?

Taking into consideration the overall comments, ATCEUC considers this NPA 2021-08 dangerous to the European Aviation Safety Standards. EASA is following a political path that doesn't serve the purpose of the European Citizens. Although some of the initiatives included in this NPA might be applicable, ATCEUC does not agree with the current proposed amendments since they aren't mature enough. Moreover, ATCEUC's main goal is to maintain Safety as the highest priority in the ATM System and it's regulatory framework, and we cannot accept any controversial changes like those suggested in the NPA 2021-08 to be implemented without a proper Safety Impact Assessment.

response *Partially accepted*

The comments on the Explanatory Note have been considered when establishing the narrative of the Opinion. EASA regrets that ATCEUC and its member organisations do not share the explanations provided and cannot associate themselves, like the majority of the other stakeholders and commentators, with the identification and analysis of the issues, as well as the proposed solutions.

Besides maintaining a high and uniform level of safety, the Agency is committed to following the directions set out by Regulation (EU) 2015/340, namely, *to improve the common licensing scheme for air traffic controllers working in the Union*. Further improvements of the rating and rating endorsement system being judged by the stakeholders too complex or not suitable for the local situations have been foreseen already in 2013 by the Opinion¹ leading to the said Regulation. The currently proposed simplification is a thorough reconsideration of the system merging overlapping privileges and without losing specific qualifications. These changes have the potential to optimise training duration.

The equivalent level of safety is simply ensured by the fact that no changes are proposed to the training requirements underlying the ratings and rating endorsements. Only the administration of those qualifications is affected. Similarly, the required competencies for instructors, assessors or student air traffic controllers remain unchanged. Enabling short-term job relations without exchanging the licence and the competent authority only concern instruction and assessment during initial training.

The simplification of the rating endorsement scheme and renaming one of the ratings as per ICAO terminology allows an appropriate use of the rating endorsements.

¹ Opinion No 11-2013.



Training for the former AIR, GMC and TWR rating endorsements is included in the training for the aerodrome control rating, and training for the tasks covered by the former removed rating endorsements (GMS, TCL) is required to be included in the unit training. The duration and content of rating endorsement training carried out before the NPA and after the NPA is not affected.

Based on the received comments, the proposal to merge GMS and RAD is withdrawn. Instead, GMS is proposed to be removed as ratings endorsement and the privileges to become part of the unit endorsement privileges. This proposal is based on the fact that the tasks that the aerodrome surface movement guidance systems are used for, are in accordance with ATS.TR.245 for monitoring and information purposes only, whereas the remaining rating endorsements include privileges related to separation or vectoring of aircraft. The use of GMS and the training for it has been unit-specific and therefore training for provision of ground movement control with the help of aerodrome surface movement guidance systems is proposed to be included in the unit endorsement course.

As for missing the references to ANSPs throughout the text, please note that in the training context it is natural that training organisations are addressed, despite the fact that in many cases they are fully integrated within the ANSPs. Nonetheless, it is the training organisation that is responsible for the development of the training plans and training courses.

Overall, no major impacts and/or controversial items have been identified throughout the preparation of the proposal. Therefore, and in accordance with the proportionality principle, instead of a detailed regulatory impact assessment, an analysis of the main benefits and drawbacks has been included in the NPA. Apart from the comments of ATCEUC and its member organisations, this consultation confirms this assessment and a great extent of support to the proposal as a whole, as well as to its individual elements.

EASA therefore trusts that ATCEUC and its member organisations at least agree with the need for increasing the efficiency of air navigation service, and training providers and will contribute at their best to achieving those benefits.

comment

304

comment by: FOCA Switzerland

Attachment [#2](#)

All BAZL comments also attached as a single PDF for convenience.

response

Noted.

1. About this NPA

p. 6



comment	85	comment by: CAA CZ
	<p>The proposed amendment to the Commission Regulation (EU) 2015/340 does not address the possibility of recognizing ATCL / ATCSL licences issued in non-member countries. License recognition and its content as proposed in this NPA is directed only to the member states. However, we experience several requirements coming from the non-member countries for ATCL /ATCSL licence recognition and/or licence exchange and current regulation does not allow this. In our opinion, the amendment of the Reg. (EU) 2015/340 should reflect and allow the ATCL / ATCSL license recognition and exchange also for non-member states.</p>	
response	<p><i>Noted</i></p> <p>The recognition of third-country ATCO licences under Regulation (EU) 2015/340 is currently under review and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.</p>	

comment	270	comment by: SINCTA
	<p><u>Technical remark:</u> SINCTA's comments were submitted accordingly with the table of contents. For some technical reason behind the CRT platform, this table of contents isn't properly aligned with the pages assigned to each comment.</p>	
response	<p><i>Noted</i></p>	

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

p. 9

comment	256	comment by: SINCTA
	<p><i>“ATCO training has been claimed to be cumbersome, costly and time-consuming partially also due to the fragmented qualification structure.”</i></p> <p>Such a claim lacks the view of the ATCO’s specific expertise. ATCO training duration is affected by the responsibility and dimension of the Safety-related tasks an ATCO performs at work. The perception of it as <i>“costly and time-consuming”</i> is purely market and profit-based. Therefore, SINCTA is shocked to read this statement signed by the European Union Agency whose mission should be to watch over European Union Aviation Safety.</p>	
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #255.</p>	



comment

257

comment by: SINCTA

“The simplification of the rating and rating endorsement system will establish a lean system of qualifications and provide benefits to the ATCO training organisations as regards the time-intensity and cost-efficiency of the training, while ensuring an equivalent level of safety.”

SINCTA highlights that this sentence evidences the real intention of EASA with this NPA 2021-08: To serve the economic interests of the ATCO Training Organisations. This level of transparency is welcome but it shows everyone worrying facts about EASA’s current vision of its own mission. SINCTA finds no technical evidence to support the later claim of this sentence *“ensuring an equivalent level of safety”*. Therefore, SINCTA questions EASA the following:

- Did EASA conduct any study to support the claim that *“equivalent level of safety”* will be ensured through the proposed measures in this NPA 2021-8? If so, which stakeholders were involved in that study? What was the ratio of ATCO and ATCO-OJTI qualified professionals in that study?

Moreover, SINCTA also highlights that no reference is made in this sentence to ANSPs. Changes in the rating and rating endorsement system will have an impact at the Service Providers’ training level and, therefore, at the Safety levels of the European ATM System.

response

Noted

Please refer to the response provided to comment #255.

comment

258

comment by: SINCTA

“On another issue, implementation feedback received from stakeholders has shown that the current regulatory framework is administratively burdensome when it comes to short-term job relations; for example, in the case of freelance instructors and assessors working for different ATCO training organisations in different Member States.”

In this remark, once again, EASA is transparent enough to show us which interests are behind this proposed amendment. SINCTA does not oppose the facilitation of ATCO’s mobility between Member States, but stating that *“the current regulatory framework is administratively burdensome”* highlights a deliberate ignorance about the rationale of the current framework, which is based on competence and proficiency evidence to guarantee the highest Safety standards. The same applies to the unpopularity of the short-term relations in the ATM Sector: Short-term job relations were never used for ATCOs in Portugal and SINCTA does not foresee that to happen in the next decade. Competence and proficiency (even for instructors providing initial training) require time to adapt and master the procedures before applying (or teaching) them. SINCTA advocates that fostering short-term job relations in ATM has a direct impact on the Safety levels (and on the quality of the



	initial training provided to the soon-to-be ATCOs) in the medium term, and urges EASA to perform a Human Performance based study on this subject.
response	<i>Noted</i>
	Please refer to the response provided to comment #255.

comment	288	comment by: <i>Danish Civil Aviation and Railway Authority</i>
	The summary text does not appear clear on the issue of including unit endorsements for exchange as student licences at present do not include unit endorsements and neither mentioned in ATCO.A.010 or ATCO.B.001. Further as a unit endorsement is achieved when completing a unit endorsement course for issuing an ATCO licence.	
response	<i>Noted</i>	

2. In summary - why and what

p. 9

comment	295	comment by: <i>Finnish Air Traffic Controllers Association</i>
	<p>Finnish Air Traffic Controllers Association (SLJY/FATCA) recognizes the rapid and wide evolment in aviation industry. Still reacting to these changes can't be done without taking safety (first) as a prior goal. Simplification shall be made; if able to simplify at all; to respect the aspects of ATCO's and secure their work in future also. Cutting training or the costs aren't the way to make air traffic controlling safer.</p> <p><i>"EASA has also followed innovations introducing dynamic cross-border sectorisation for the provision of air traffic services; for example, the FINEST project between the Finnish and Estonian flight information regions (FIRs). Regarding the licensing aspects of the project, the use of the ICAO location indicator in the unit endorsement has been identified as one of the problem areas. "</i></p> <p>FINEST project has lots of other problem areas still to work out but for sure ATCO's licencing and also training for endorsement are big issues. Just clarification for ICAO location indicator doesn't solve the main problem for project.</p>	
response	<i>Noted</i>	
	EASA is carefully following the development of FINEST project. The present NPA targets at facilitating the licensing aspects of the project from an administrative perspective, while the other aspects noted by the commentator are of different nature.	



2.2. ICAO references relevant to the content of this RMT

p. 10

comment	259	comment by: SINCTA
	<p><i>“This NPA contains proposals to remove several of the current rating endorsements to simplify the European system and further align with ICAO.”</i></p> <p>SINCTA follows the intention of alignment with ICAO but highlights that the current rating endorsements’ system has a Safety-based rationale behind. Removing any rating endorsement should be made with the guarantee that the required training associated with that rating endorsement will remain mandatory for the ATCO rating to which such rating endorsement was related.</p>	
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #255.</p>	

2.4.1. Simplify the system of ratings and rating endorsements

p. 11

comment	20	comment by: ENAIRE
	<p>Question 1. Do you think the full ACP rating will still be needed in 2023 and beyond? Yes, in ENAIRE is needed for Canary Islands. There are two significant areas where only procedural control is supported. Neither the Sahara nor the Oceanic sector areas have radar coverage. These areas cover 950000 km², which means two-thirds of the whole air space in the Canary Islands FIR.</p>	
response	<p><i>Noted</i></p>	
comment	21	comment by: ENAIRE
	<p>Question 2. Do you anticipate that ground-controlled precision approaches will still be provided by civil ATCOs in 2023 and beyond, thus creating a need for the PAR rating endorsement? No comments. Not used at ENAIRE.</p>	
response	<p><i>Noted</i></p>	
comment	156	comment by: AESA/DSANA
	<p>2.4.1.1 Air traffic controller ratings</p>	

	<p>Question 1</p> <p>COMMENT It will depend on the evolution of ADS and other methods of surveillance in the places where it is not possible to cover with radar.</p> <p>JUSTIFICATION Nowadays we consider it is still necessary and it is good for the students to have this module to better acquire the area control objectives.</p>
response	<i>Noted</i>

comment	<p>222 comment by: <i>French DGAC</i></p> <p>Answer to question 1 of EASA : The ACP rating will indeed be needed in 2023 and beyond, especially in our outermost regions.</p> <p>An add-on module to the ACS course, although not our favourite option, might be acceptable, provided the Area control Procedural aspect is clearly identified within the ACS training. The licensing authority should have no doubt whether the ACP add-on is or is not warranted for a given ATCO. However, we want to emphasise that this does not constitute a simplification since, first, the licence becomes less readable in terms of ACP privileges granted or not granted, secondly managing the transition will create an administrative burden, and thirdly upgrading the IT system will come at a cost</p>
response	<i>Noted</i>

comment	<p>224 comment by: <i>French DGAC</i></p> <p>P. 12, 2.4.1.2, 1rst paragraph, last sentence</p> <p>The current provisions allow to see at first glance the privileges detained by an ATCO, as the rating and rating endorsement codes are well-known. On the contrary, unit endorsements (currently coded as a 2-letter code in France) are less easy to read, especially in cross-border situations or in case of a change of authority. Merging rating endorsement, and transferring the relevant privileges information or lack thereof in a unit endorsement seems less clear. Furthermore, coding new information in unit endorsements will be a burden for the authority and will imply IT development costs. Additionally, managing the transition with a double system will be an administrative burden.</p>
response	<i>Noted</i>



The proposed changes may require adaptation of the software used by the CA to issue/revalidate/renew ATCO licences and will require re-issuing of the ATCO licences in accordance with the new provision within a period of 3 years or when the revalidation process happens. A fixed date for the issuance of all ATCO licences in accordance with the new provision could be as well envisaged by the CA, i.e. issuing all affected licenses at the end of the transitional period. In this way, the two situations for different ATCOs could be avoided. It is up to the ANSP and the competent authority to establish the unit endorsements in a way that is understandable and clear for themselves. There should not be any ambiguity in cases of change of competent authority as unit endorsements are not mutually recognised.

comment

226

comment by: *French DGAC*

P. 13, 2.4.1.2, 2nd paragraph, last sentence :

Merging the ground movement surveillance (GMS) and aerodrome radar (RAD) rating endorsements seems questionable, in a context where the AIR and GMC are also integrated in the ADC rating. By itself, the combination ADC/SUR will become unreadable in terms of privileges: the combination ADC/SUR might imply privileges for AIR and /or GMC, and GMS and/or RAD.

response

Partially accepted

Based on the received comments, the proposal to merge GMS and RAD is withdrawn. Instead, GMS is proposed to be removed as ratings endorsement and the privileges to be included in the unit endorsement. Training for ground movement surveillance should become part of the unit endorsement course in units providing this service.

comment

227

comment by: *French DGAC*

P. 13, 2.4.1.2, 3rd paragraph :

In France, no terminal control rating endorsements (TCL) are used. We have no objections to removing them.

response

Noted

comment

252

comment by: *French DGAC*

P. 13, Question 2 of EASA :

In France, no Precision Approach Radar rating endorsements (PAR) are used. We have no objections to removing them.

On the other hand, we still use OCN rating endorsement in our outermost regions, therefore it should not be deleted.



response *Noted*

comment

261

comment by: SINCTA

“2.4.1. Simplify the system of ratings and rating endorsements”

SINCTA supports the rationale of merging the ADI and ADV ratings into a single ADC rating since it is a desired alignment with ICAO. Regarding rating endorsements, SINCTA also supports merging rating endorsements privileges of TWR, AIR and GMC into the new ADC rating privileges. However, none of these merging processes should lower the overall objectives of the initial, basic and unit training. SINCTA accepts the administrative reform of some of the ratings and rating endorsements but condemns any initiative to reduce the duration, goals and/or standards of the current ATCO training framework, since it would most probably affect the current Safety standards observed in the European ATM infrastructure.

response

Noted

Please refer to the response provided to comment #255.

comment

262

comment by: SINCTA

“2.4.1.1 Air traffic controller ratings”

Regarding Question 1 from EASA, SINCTA highlights that ACP is needed to guarantee the necessary training to provide Safe Procedural Area Control in a portion of Airspace. Although the vast majority of the European Airspace might be under surveillance in the few years to come, to convert the current ACP privileges into an ACS add-on to cover only contingency situations could only be acceptable if those contingency procedures were to “empty the sky” and not to accept any additional traffic into the portion of Airspace where surveillance systems were unavailable. To this statement SINCTA highlights that the “empty the sky” rationale was mentioned by EASA representatives in a previous ATM/ANS.TEC meeting, as reported by our ATCEUC partners.

Furthermore, SINCTA also highlights that many new surveillance systems are outsourced (e.g. space-based ADS-B) and its providers follow a market-based philosophy in their operations. By deleting ACP and accepting that the sudden unavailability of the surveillance service provision means emptying the European Skies for as long as the external company needs to resume its normal operations, EASA is gambling high on the seamless service provision of companies which mission and technical approach are drastically different from the ANSPs infrastructural philosophy.

SINCTA also highlights that the surveillance systems’ redundancy is not the same across the entire Europe. Being Portugal on the southwestern edge of the Continent, many surveillance areas in Lisbon and Santa Maria FIRs have much fewer (to none) redundancies when compared with central Europe.



	Therefore, SINCTA sees ACP as needed from 2023 and beyond, until the day the newcomers into the ADSP Sector prove to be as resilient, competent and safe as the current ANSP-based systems.
response	<i>Noted</i>

comment	<p>263 comment by: SINCTA</p> <p><i>“2.4.1.2. Air traffic controller rating endorsements”</i></p> <p><i>“Additional comments addressed the identification of AIR or GMC as limitation in case of the expiry of the unit endorsement and following an exchange of licence. EASA considers however that this is covered by the current requirements on record-keeping and on the exchange of information between competent authorities.”</i></p> <p>In this consideration EASA contradicts the goal of “simplification” mentioned in this NPA 2021-8 since it adds administrative burdensome in exchanging details of record-keeping between competent authorities. If the proposed rating system still requires record-keeping and exchange of information between competent authorities in cases of mobility between Member States, then it is obvious that the proposed rating system is over-simplified.</p>
response	<p><i>Noted</i></p> <p>Keeping records of the issued licences and exchanging information between competent authorities when a licence holder is changing competent authority, is considered necessary regardless of the proposed changes on the rating endorsements.</p>

comment	<p>264 comment by: SINCTA</p> <p><i>“The ground movement surveillance (GMS) and aerodrome radar (RAD) rating endorsements are proposed to be merged into one rating endorsement that is called ‘aerodrome control surveillance’ (SUR).”</i></p> <p>SINCTA does not agree with the merging of surveillance rating endorsements GMS and RAD into a single SUR, since using Surveillance systems to support ATCOs’ tasks is substantially different when applied at Ground level or Airborne traffic. Therefore, SINCTA advocates that under the new ADC rating the GMS and SUR rating endorsements shall remain, with the second one referring to the Surveillance competence regarding airborne traffic only.</p>
response	<i>Partially accepted</i>



Please refer to the response provided to comment #255.

comment	275	comment by: <i>GATE Aviation Training</i>
	Gate Aviation Training suggests changing ACP rating to an endorsement to ACS rating.	
response	<i>Not accepted</i>	
	Based on the answers received on Question 1 of the NPA, there are still several ANSPs that use the ACP rating and support the maintenance of the full ACP course.	

comment	276	comment by: <i>GATE Aviation Training</i>
	Gate Aviation Training does not anticipate the PAR endorsement to be used by civil ATCO.	
response	<i>Noted</i>	

2.3. What we want to achieve - objectives	p. 11
--	-------

comment	260	comment by: <i>SINCTA</i>
	<p><i>“The general objective of RMT.0668 is to ensure a high and uniform level of safety in air traffic management (ATM)/air navigation services (ANS) (...)”</i></p> <p>SINCTA supports the general objective of RMT.0668 but underlines that, unfortunately, the current NPA has an obvious goal that is far from the stated goal in this sentence. In fact:</p> <p><i>“The specific objectives of this proposal are to simplify the system of ratings and rating endorsements, to facilitate the mobility of instructors, assessors and student ATCOs, to facilitate the licensing of ATCOs in cases of dynamic cross-border sectorisation, and to update and streamline the initial training content to be in line with the latest developments.”</i></p> <p>The specific objectives stated have nothing to do with Safety, and it is SINCTA’s belief that the simplifications suggested in this Amendment will put additional pressure in the ANSP’s training plans and decrease the success rate at Unit training level. EASA is suggesting changes in the rating and rating endorsements’ system and in the initial training content for improving the cost-effectiveness of the initial training and,</p>	



	therefore, creating a market-based training system for ATCO's at European Level. However, SINCTA has no information on any Safety Impact assessment study on the proposed changes, and we strongly suggest EASA, as an alleged Safety Agency, to conduct a proper one before proposing this Amendment to the European Commission.
response	<i>Noted</i> Please refer to the response provided to comment #255.

2.4.3. Facilitate the licensing of ATCOs in cases of dynamic cross-border sectorisation	p. 12
--	-------

comment	214 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	2.4.1.2 Air traffic controller rating endorsements, Question 2, Page 13 PAR is used in Sweden and we would like to keep PAR rating endorsement.
response	<i>Noted</i>

comment	229 comment by: <i>French DGAC</i>
	P. 14, 2.4.3, 2nd paragraph : As mentioned above, unit endorsements are not necessarily the easiest to read cross-frontier; and creating more codes will be a burden for the oversight authority.
response	<i>Noted</i> Please refer to the response provided to comment #224.

comment	265 comment by: <i>SINCTA</i>
	<i>"The proposal is that the ICAO location indicator should indicate the unit that manages the ATCO's competence maintenance. The sectors, airspace or working positions, where the ATCO is competent to provide services, can be further specified in the unit endorsement by using other abbreviations."</i>
	SINCTA is aware of the FINEST project and its potential. However, SINCTA would expect to see EASA focused on the Safety side of the project rather than the "flexible resource management" that the FINEST project aims at. Having this in mind, SINCTA



response	<p>urges EASA to conduct a proper Human Performance based study on how Safety is affected by the variety of sectors that an ATCO may provide service within the very same Unit. In the end, with the present clarification, EASA might be fostering a project that contradicts the Safety goals of the very own Agency.</p> <p><i>Noted</i></p> <p>Please refer to the responses provided to comments #255 and #295.</p>
comment	<p>298 comment by: <i>Finnish Air Traffic Controllers Association</i></p> <p>FINEST project aims for dynamic and efficient use of airspace. Finland and Estonia already have good aspects (hard- and software) and ways to deal this without no cross-border sectorisation or licencing problems. With proper training it would become more flexible and be still safe. The airspace structures in these countries are totally different which will affect to get the endorsement for both FIRs either by spending money or saving in safety issues.</p> <p><i>"This clarification should help ANSPs and competent authorities regarding licensing aspects when establishing dynamic cross-border sectorisation or virtual centres"</i></p> <p>Who would be the competent authority if ATCO is handling the traffic in other countries airspace? FATCA/SLJY sees a huge conflict in licencing and in licence endorsement for more than one country. Which laws would be applied and who is the responsible authority for granting the licence to work in the airspace of the other country? Who will do the assessing for licence? These questions are more important than what are the location indicator markings in the licence. We are very concerned if these questions are not taken seriously.</p> <p>For safer future,</p> <p>Suomen Lennonjohtajien Finnish Air Traffic Controllers Association</p>
response	<p><i>Noted</i></p> <p>The nomination and designation of competent authorities is addressed in article 5 of Regulation (EU) 2015/340. Within a functional airspace block or in the case of cross-border service provision, the competent authorities shall be designated by agreement of the Member States concerned.</p>

2.4.2. Facilitate the mobility of instructors, assessors and student air traffic controllers	p. 12
---	-------



comment	215	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	<p>2.4.1.1 Air traffic controller ratings, Question 1, Page 12 Sweden have a good WAM coverage and do normally not use ACP. But in the respect of contingency, a form of ACP could be useful.</p>	
response	<i>Noted</i>	

comment	228	comment by: <i>French DGAC</i>
	<p>P. 14, 2.4.2 last paragraph : In the current organisation, the licence exchange guarantees that the authority knows whether an instructor or assessor is current on the appropriate requirements, which is satisfactory. As far as the oversight authority is concerned, exchanging information with other authorities to verify the compliance of an occasional instructor or assessor is not a simplification.</p>	
response	<p><i>Noted.</i> Exchange of information is already required for the exchange of the licence in the current provisions.</p>	

comment	289	comment by: <i>Danish Civil Aviation and Railway Authority</i>
	<p>This part of the summary text mentions the issue of unit endorsement for student licences as also mentioned in para 2.1. However, this seems unclear as unit endorsements should not encompass for student licences when making an exchange to another CA, as unit endorsements are achieved after completing a unit endorsement course and by this obtain an ATCO licence. For the aim of improving mobility, it can be supported to implement mutual recognition for cross border use of student licences which further minimize administrative burdens meaning that an exchange is not required for exercising student training within the EU. (As also mentioned in comment #288)</p>	
response	<i>Noted</i>	

2.4.4. Update the initial training requirements

p. 12



comment	<p data-bbox="379 203 432 232">266</p> <p data-bbox="1129 203 1385 232">comment by: SINCTA</p> <p data-bbox="379 286 1385 387"><i>“In summary, the TF anticipates that the introduced changes (4 % reduction of Basic training objectives and downgrading to a lower taxonomy level) will contribute to a slight reduction of the duration of the Basic training.”</i></p> <p data-bbox="379 432 1385 674">SINCTA is shocked with the fact that EASA supports the reduction of Basic training objectives and a downgrade to lower taxonomy levels in order to reduce the duration of Basic training. Again: EASA is not focused on the Safety part of the system. Instead, EASA is following an economical agenda of a few stakeholders, disregarding the Safety impact of its proposals. SINCTA urges EASA to conduct a proper Safety Impact assessment on the mentioned <i>“reduction of Basic training objectives and downgrading to a lower taxonomy level”</i>.</p>
response	<p data-bbox="379 703 459 732"><i>Noted</i></p> <p data-bbox="379 786 1062 815">Please refer to the response provided to comment #255.</p> <p data-bbox="379 860 1385 969">Please see Sub-NPA B in which the reasoning for every individual change in basic training objectives has been given. No comments on these individual changes, or how these changes could possibly affect the safety, have been received from SINCTA.</p>

2.5. What are the expected benefits and drawbacks of the proposal	p. 16
--	-------

comment	<p data-bbox="379 1229 432 1258">230</p> <p data-bbox="1059 1229 1385 1258">comment by: French DGAC</p> <p data-bbox="379 1312 699 1341">P. 18, 2.5, 2nd paragraph :</p> <p data-bbox="379 1386 1385 1518">Although the number of ratings and rating endorsements is reduced in this NPA, the administrative burden for the oversight authority isn't significantly decreased, since the relevant information will need to be dealt with in unit endorsements, by way of limitation of the privileges.</p>
response	<p data-bbox="379 1550 459 1579"><i>Noted</i></p> <p data-bbox="379 1610 1385 1794">The level of the administrative burden and its potential decrease depends on the current set-up of each oversight authority and whether or not those privileges in question were currently in use. Overall, at European level, a leaner rating and rating endorsement system will positively contribute to a simpler management of those privileges that benefit from the mutual recognition.</p>

comment	<p data-bbox="379 1908 432 1937">231</p> <p data-bbox="1059 1908 1385 1937">comment by: French DGAC</p> <p data-bbox="379 1991 695 2020">P. 18, 2.5, 3rd paragraph :</p>
---------	--



response	<p>In France, ADV is used as a stand alone rating.</p> <p><i>Noted</i></p> <p>The answer provided by DGAC to the rating survey states that ADV is used together with ADI in France.</p>
comment	<p>232 comment by: <i>French DGAC</i></p> <p>P. 18, 2.5,4th paragraph :</p> <p>As mentioned above, although the number of ratings and rating endorsements is reduced in this NPA, the administrative burden for the oversight authority isn't significantly decreased, since the relevant information will need to be dealt with in unit endorsements, by way of limitation of the privileges. Additional training will be needed for ADI privileges for candidates who only hold an ADV rating.</p>
response	<p><i>Noted</i></p> <p>It is true that the administrative burden may not be significantly reduced in the Member States that will use the limitations. However, EASA is only aware of two States where this would be the case.</p> <p>Additional training for ADV holders intending to provide services in accordance with ADI is also needed today, so there is no change.</p>
comment	<p>233 comment by: <i>French DGAC</i></p> <p>P. 19, 2.5, phrase : "<i>Competent authorities will benefit from : The easier licence administration...</i>"</p> <p>As mentioned above, we do not see a significantly easier licence administration</p>
response	<p><i>Noted</i></p> <p>Please see the response to comment #232.</p>
comment	<p>234 comment by: <i>French DGAC</i></p> <p>P. 19, 2.5, phrase : "<i>the alignment of the requirements with those applicable in other aviation domains, where applicable</i>" :</p> <p>Because ATCO licensing department is separate from other aviation domains in France, the alignment of the requirements is not needed.</p>



response

Noted

There are many competent authorities where licensing for all domains is dealt with within one department.

comment

267

comment by: SINCTA

"2.5. What are the expected benefits and drawbacks of the proposal"

"The proposed merging of GMS and RAD rating endorsements into one new rating endorsement called SUR corrects the identified deficiency in the regulation not enabling a holder of AIR and RAD endorsements to use aerodrome surface movement guidance systems."

SINCTA fully disagrees with this EASA statement. GMS and RAD rating endorsements do exist to differentiate two tasks that, although semantically similar, are extremely different to execute. Ground Movement Control aided by Surveillance systems is significantly different from Airborne Traffic Control with similar technological support. Moreover, many European airports have just one of the Surveillance systems available. SINCTA advocates that GMS and RAD (converted into SUR) shall be maintained.

response

Noted

Please refer to the response provided to comment #255.

comment

268

comment by: SINCTA

Regarding the expected benefits of this proposal, SINCTA highlights the focus of the training organisation benefits and questions the ANSPs benefits. SINCTA does not believe that *"potential employment shortage being handled more easily thanks to the higher mobility of student ATCOs"* will be observed, since EASA is lowering the Basic training standards in order to reduce the duration of the Basic training (for the good of training organisations' market case). Reducing these standards will result in an increased duration of the later Unit training as well as a possible reduction on the success rate of the Unit training process. Therefore, potential employment shortage will still be a problem in the future, since it is Human (not bureaucratic) to take quite some time to learn how to handle Air Traffic safely in any Air Traffic Control environment.

Changes in the administrative process at Basic training level will affect the Unit training level. **SINCTA urges EASA to look at the bigger picture when addressing ATCO training and to see the full cycle "from applicant to a qualified ATCO" and its interdependencies.**

Regarding the benefits for ATCOs, SINCTA urges EASA to consider that increased mobility might foster social dumping in the ATM Sector. SINCTA is not against the



	increased mobility between Member States, but urges EASA to conduct a proper Social Impact assessment on the increased ATCO mobility at European level. Unfortunately, EASA shows in this NPA 2021-08 that the only study that supports such amendments must have been an Economic Impact assessment at Initial Training Organisations' level.
response	<p><i>Noted</i></p> <p>EASA is not proposing to lower the basic training standards. All changes in the initial training content are individually justified in Sub-NPAs B-G. The review is in line with the request for changes that had been proposed by users.</p>

comment	269	comment by: SINCTA
	<p><i>"Considering that this proposal would not have major impacts and/or controversial items, a brief analysis of the main benefits and drawbacks has been included in this section and no detailed impact assessment (IA) has been performed, in accordance with the proportionality principle."</i></p> <p>SINCTA does not agree with the EASA statement that the current NPA 2021-8 has no major impacts and/or controversial items. As one can read in SINCTA's comments, many proposals may have major impacts, and many more are controversial items. Therefore, a detailed impact assessment shall be performed, with a proper PSO representativity in such study.</p>	
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #255.</p>	

Article 3 Provision of air traffic control services
--

p. 18

comment	251	comment by: French DGAC
	<p>FRANCE MAIN COMMENT</p> <p>P. 20, Article 3</p> <p>Based on article 3 (3) of regulation 2015/340, France currently issues European ATCO licences to air traffic services.</p> <p>France is alarmed that the possibility of issuing European ATCO licences to military air traffic controllers providing general air traffic services disappears from article 3(3) of Regulation 2015/340. It will create a serious administrative burden for France that currently issues European ATCO licences to military personnel, as France would subsequently need to convert them back into national licences, and to reinstate a national regulatory and oversight framework, for no safety benefit.</p>	



response

Furthermore, giving up European licences for military air traffic controllers is contrary to the goal of the NPA, that is enhancing mobility options.

In addition, in our views, it is not acceptable to call into question a practice that has been authorised by European regulations for many years.

Therefore, France considers that it is imperative that article 3 (3) is maintained in regulation 2015/340.

Accepted

Article 3(3) is proposed to be kept in its current form.

Article 4 Definitions

p. 19

comment

75

comment by: CANSO

Article 4 Definitions

Concerning the word “evaluation”:

- (a) -It seems to be introduced in the draft regulation with different meanings. One clear definition is needed which can be applied on the whole document.
- -Today the word “evaluation” is already used in the regulation - GM1 Art 4(6) Definitions – ED Decision 2015/010/R): *The formative evaluation of practical skills during training is a form of coaching and should not be considered as an assessment.*

Avoid a conflict of the new definition with what already exists.

Keep the GM concerning “formative evaluation”, as it is used not only in our ANSP, but it’s a general pedagogic term.

We would either suggest to search for another “plain English” word that could cover the needs (eg “determination of “(so to replace “evaluation”), or use the word “evaluation” in a very broad sense that also includes the “formative evaluation”. A formative evaluation has got nothing to do with an assessment.

Additionally the definition should be correctly applicable to the whole document.

For your info, skeyes defined “formative evaluation” as: *a teaching and feedback session aimed at helping the trainee in their learning process. The instructor should*



	<i>be teaching and the feedback should serve to: motivate trainees; identify strengths and weaknesses and promote learning. A formative evaluation should be factual in content and based on the practical observations of the session. It is not considered as an assessment.</i>
response	<i>Noted</i>
	Please refer to the response provided to comment #129.

comment	129	comment by: <i>skeyes</i>
	<p>Concerning the word “evaluation”:</p> <ul style="list-style-type: none"> - It seems to be introduced in the draft regulation with different meanings. One clear definition is needed which can be applied on the whole document. - Today the word “evaluation” is already used in the regulation - GM1 Art 4(6) Definitions – ED Decision 2015/010/R): The formative evaluation of practical skills during training is a form of coaching and should not be considered as an assessment. Avoid a conflict of the new definition with what already exists. <p>Keep the GM concerning “formative evaluation”, as it is used not only in our ANSP, but it’s a general pedagogic term.</p> <p>We would either suggest to search for another “plain English” word that could cover the needs (eg “determination of “(so to replace “evaluation”), or use the word “evaluation” in a very broad sense that also includes the “formative evaluation”. A formative evaluation has got nothing to do with an assessment.</p> <p>Additionally the definition should be correctly applicable to the whole document.</p> <p>For your info, skeyes defined “formative evaluation” as: a teaching and feedback session aimed at helping the trainee in their learning process. The instructor should be teaching and the feedback should serve to: motivate trainees; identify strengths and weaknesses and promote learning. A formative evaluation should be factual in content and based on the practical observations of the session. It is not considered as an assessment.</p>	
response	<i>Noted</i>	
	The term evaluation is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.	

comment	223	comment by: <i>CAA Norway</i>
---------	-----	-------------------------------



	<p>AMC1 ATCO.B.025 (a)(3) sectors and/or positions. Sector is defined, position is not defined.</p> <p>To establish a common understanding of the term position/working position, we suggest to add a new definition for <u>position (or working position)</u>:</p> <p>Position/working position(s) in this context should be</p> <ul style="list-style-type: none"> -a physical location/position in an ATS environment -described for the unit and/or sector and forming part of a unit endorsement -roles and tasks for duties are clearly established -described in the unit competence scheme <p>A common understanding will enhance the foundation for registration of minimum working hours for a particular unit endorsement.</p>
response	<p>Noted</p>
	<p>As this comment relates to the provision of remote ATS, EASA invites CAA Norway to comment on the forthcoming NPA on Remote Aerodrome ATS (RMT.0624).</p>

Article 7 Transitional provisions	p. 22
--	-------

comment	<p>22 comment by: <i>ENAIRE</i></p> <p>Article 7. Question 3. Keep Article 7(1). Although register must be kept for 5 years, we consider this paragraph is useful considering some requirements for the ATCO that can be used to demonstrate compliance with the necessary requirements and that those should be considered valid, such as the experience of a previous rating (ATCO.C.045 c) 1, ATCO.C.055 a).</p>
response	<p><i>Noted</i></p>

comment	<p>44 comment by: <i>Civil Aviation Authority the Netherlands</i></p> <p>Question 3:</p> <p>Art 7.1 should remain in force. As long as an STDI endorsement is a licence endorsement, a licence issued in accordance with (EU) 805/2011 can be used for the application and issue of an (EU) 2015/340 licence with the STDI endorsement entered on this licence.</p> <p>Regulation (EU) 2018/1139 article 52 speaks about ‘instructor certificate’ and not about ‘instructor endorsement’. And Annex VIII 4.7.3. says:</p>
---------	--



response	<p>Instructors on practical skills shall also be or <u>have been entitled</u> to act as an air traffic controller.</p> <p>Have been entitled means that you don't need to have an ATCO licence anymore. But the STDI definition in article 4 (new 29 old 27) of the (EU) 2015/340 states that the STDI endorsement is an authorisation entered on and forming part of a licence. So as long as an STDI is considered to be a licence endorsement, article 7.1 of Regulation (EU) 2015/340 is needed.</p> <p>Suggested resolution: Keep the STDI endorsement as licence endorsement if the (former) ATCO holds a (EU) 2015/340 licence, but accept an STDI certificate for those former ATCOs who are not in the possession of a (EU) 2015/340 licence but can prove that they have been entitled to act as an air traffic controller.</p>
	<p><i>Noted.</i></p>
	<p>In order to exercise the STDI privileges, a licence and associated STDI endorsement issued in accordance with Regulation (EU) 2015/340 is required. Article 7.1 stipulates which licences are deemed to be issued in accordance with Regulation (EU) 2015/340.</p>

comment	<p>55</p> <p style="text-align: right;">comment by: <i>CANSO</i></p> <p>Question 3 Art 7.1 should stay in force. As long as a STDI endorsement is a licence endorsement a licence issued in accordance with (EU) 805/2011 can be used for the application and issue of an (EU) 2015/340 licence with the STDI endorsement entered on this licence.</p> <p>Regulation (EU) 2018/1139 article 52 speaks about 'instructor certificate' and not about 'instructor endorsement'. And Annex VIII 4.7.3. says: Instructors on practical skills shall also be or <u>have been entitled</u> to act as an air traffic controller. Have been entitled means that you don't need to have an ATCO licence anymore. But the STDI definition in article 4 (new 29 old 27) of the (EU) 2015/340 says that the STDI endorsement is an authorisation entered on and forming part of a licence. So as long as a STDI is considered to be a licence endorsement, article 7.1 of Regulation (EU) 2015/340 is needed.</p> <p>Suggested Resolution Keep the STDI endorsement as licence endorsement if the (former) ATCO holds a (EU) 2015/340 licence, but accept a STDI certificate for those former ATCOs who are not in the possession of a (EU) 2015/340 licence but can prove that they have been entitled to act as an air traffic controller.</p>
response	<p><i>Noted</i></p>

Please refer to the response provided to comment #44.

comment

148

comment by: *CANSO*

Article 7 GM1 : Air traffic controllers who have obtained the Aerodrome Control Visual (ADV)rating at an aerodrome that will publish instrument approach and departure procedures,or air traffic controllers moving to an aerodrome with published instrument approach and departure procedures, should undergo a specific rating training in a certified initial training organisation to acquire competence equivalent to Aerodrome Control (ADC)rating. For such air traffic controllers, the licence will contain the ADC rating after the successful completion of the specific rating training.

Ok with GM1 on article 7

response

Noted

comment

149

comment by: *CANSO*

Article 7 : Holders of the Aerodrome Control Visual (ADV) rating, who do not hold an Aerodrome Control Instrument (ADI)rating, shall continue to be authorised to provide air traffic control service to aerodrome traffic at an aerodrome that has no published instrument approach or departure procedures, provided that the validity of such rating is maintained.

CANSO is thankful of that article which must remain in final version.

response

Noted

comment

157

comment by: *AESA/DSANA*

Article 7 Transitional provisions
Question 3

COMMENT

According to Regulation (EU) N 340/2015, records shall be kept for 10 years and not 5 years as described in the question 3. At this moment, we are still receiving requests to exchange licences issued in accordance with Directive 2006/23/EC and Regulation (EU) N° 805/2011. So, from our poin of view, article 7 paragraph should not be deleted.

JUSTIFICATION

ATCO.AR.B.015 c): with regard to personnel licences, records shall be kept for a minimum period of 10 years



response

Noted

comment

158

comment by: AESA/DSANA

Article 7 Transitional provisions

COMMENT

For holders of the ADV rating, can the ADV rating be maintained indefinitely or does it have a period in which it should be removed?

JUSTIFICATION

It is not clear in Article 7.2 "Holders of the Aerodrome Control Visual (ADV) rating, who do not hold an Aerodrome Control Instrument (ADI) rating, shall continue to be authorised to provide air traffic control service to aerodrome traffic at an aerodrome that has no published instrument approach or departure procedures, provided that the validity of such rating is maintained."

response

Noted

The ADV rating can be maintained indefinitely for the licence holders that maintain the validity of the rating. For those licence holders that also hold an ADI rating, the ADV/ADI should be replaced by an ADC rating within the defined time frame. After the transitional period, the ADV rating will no longer be issued.

comment

159

comment by: AESA/DSANA

Article 7 Transitional provisions

COMMENT

Why is the "GM1 Article 7 (2) Transitional provisions" a GM and not an AMC?

JUSTIFICATION

This GM seems to be a standard, not just guidance material

response

Accepted.

The GM1 to Article 7(2) will become an AMC.

comment

202

comment by: DSNA/SDRH

Article 7 GM1 :

Ok with GM1 on article 7

response

Noted

comment	203	comment by: <i>DSNA/SDRH</i>
	DSNA is thankful of that article which MUST remain in final version.	
response	<i>Noted</i>	

comment	235	comment by: <i>French DGAC</i>
	<p>P. 24, Art. 7, new (2), phrase "... who do not hold an Aerodrome Control Instrument (ADI) rating..."</p> <p>In France holders of an ADV rating also hold an ADI rating as part of their initial training, but some do not exercise the ADI privileges and therefore the validity of their ADI rating is not necessarily maintained. We suggest the following amendment:</p> <p><i>"2. Holders of the Aerodrome Control Visual (ADV) rating, who do not hold an Aerodrome Control Instrument (ADI) rating, <u>or who hold an Aerodrome Control Instrument (ADI) rating whose validity is not maintained</u>, shall continue to be authorised to provide air traffic control service to aerodrome traffic at an aerodrome that has no published instrument approach or departure procedures, provided that the validity of such rating is maintained."</i></p>	
response	<i>Not accepted.</i>	
	This article is about the privileges of the ADV holder. There is no added value by the introduction of the proposal.	

comment	236	comment by: <i>French DGAC</i>
	<p>P. 24 GM1 Article 7(2) Transitional provisions</p> <p>Is the training mentioned here submitted to the requirements related to a full initial training, including for example examinations and assessments?</p>	
response	<i>Accepted</i>	
	A new sentence is added to explain that the specific rating training should address the differences between ADV and ADC.	



comment	237	comment by: <i>French DGAC</i>
	<p>P. 24, EASA Question no 3 :</p> <p>We consider that Article 7 (1) can be deleted.</p>	
response	<i>Noted</i>	

comment	277	comment by: <i>GATE Aviation Training</i>
	<p>Article 7 (1) can be deleted. We believe that all ATCOs in Europe have been reissued the licence under 340/2015 already. If not, there will be enough time to do so before the date of applicability of the updated regulation.</p>	
response	<i>Noted</i>	

comment	287	comment by: <i>Finnish Transport and Communications Agency</i>
	<p>Finnish Transport and Communications Agency has the following comment on Question 3 (Transitional provisions): Nationally the records are kept for longer period, and it should be noted that there could be cases where a person who has held a license based on Regulation 805/2011 but has stopped exercising the use of license before the applicability of EU 340/2015, would want to start exercising their license again. Of course it is to be taken into account that refresh training is needed, but could this old license then be exchanged to a license based on a new regulation if the transitional provision is removed from the regulation? We consider that different options to recognize licenses should not be blocked.</p>	
response	<i>Noted</i>	

comment	290	comment by: <i>Danish Civil Aviation and Railway Authority</i>
	<p>As it could be relevant still to recognise a license that is issued in accordance with 805/2011, we support keeping the article 7(1). In DCARA records are kept longer than 5 years.</p>	
response	<i>Noted</i>	

**Article 8 Replacement of licences, adaptations Conversion and inclusion of privileges ,
training courses and unit competence schemes**

p. 23



comment	10	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	Article 8 5.: we welcome the integration of TCL in APS and ACS.	
response	<i>Noted</i>	

comment	11	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	<p>Article 8 6. "SRA <u>may</u> be included in the privileges of APS rating": Generally we support this. However, who is to decide the inclusion? DFS suggests to add "on demand of the ANSP". Anyway, the SRA is no longer subject to the objectives. So, if there was a negative decision to integrate SRA, there should be possibility to teach that during unit training (proposal for GM).</p>	
response	<i>Noted</i>	
	<p>Training for SRA can be performed during unit training. AMC1 ATCO.D.055(b)(6) DURATION OF UNIT ENDORSEMENT COURSES refers to ICAO Annex 1 where some requirements for SRA training are included.</p> <p>Based on other received comments, the proposal to remove the SRA rating endorsement is however withdrawn.</p>	

comment	12	comment by: <i>DFS Deutsche Flugsicherung GmbH</i>
	<p>GM1 Article 8: We support that TCL now has clear correlation to any surveillance rating.</p>	
response	<i>Noted</i>	

comment	23	comment by: <i>ENAIRE</i>
	<p>Article 8.6. "SRA <u>may</u> be included in the privileges of APS rating": Proposal for a GM to indicate to train SRA objectives, if applicable, within unit training.</p>	
response	<i>Noted</i>	
	Please refer to the response provided to comment #11.	



comment	45	comment by: <i>CANSO</i>
	Article 8 5.: we welcome the integration of TCL in APS and ACS.	
response	<i>Noted</i>	

comment	46	comment by: <i>CANSO</i>
	<p>Article 8 6. "SRA <u>may</u> be included in the privileges of APS rating": Generally we support this. However, who is to decide the inclusion? DFS suggests to add "on demand of the ANSP". Anyway, the SRA is no longer subject to the objectives. So, if there was a negative decision to integrate SRA, there should be possibility to teach that during unit training (proposal for GM).</p> <p>CANSO suggests to add "on demand of the ANSP".</p> <p>Proposal for a GM to indicate to train SRA objectives, if applicable, within unit training.</p>	
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #11.</p>	

comment	47	comment by: <i>CANSO</i>
	<p>GM1 Article 8: We support that TCL now has clear correlation to any surveillance rating.</p>	
response	<i>Noted</i>	

comment	64	comment by: <i>CANSO</i>
	<p>Article 8.</p> <p>Article 8 6. "SRA <u>may</u> be included in the privileges of APS rating"</p> <p>Proposal for a GM to indicate to train SRA objectives, if applicable, within unit training.</p>	



response

Noted

Please refer to the response provided to comment #11.

comment

76

comment by: *CANSO*

Article 8 Conversion and inclusion of privileges

The competent authorities shall convert the privileges of holders of the Aerodrome Control

Instrument (ADI) rating issued before dd.mm.yyyy (date of applicability) into the privileges of the Aerodrome Control (ADC) rating upon revalidation or renewal of the unit endorsement, but no later than dd.mm.yyyy (date of applicability + 3 years).

The privileges of the Air Control (AIR), Ground Movement Control (GMC) and Tower Control (TWR) rating endorsements issued before dd.mm.yyyy (date of entry applicability) are included endorsement, in accordance with ATCO.B.020(b), upon revalidation or renewal of the unit endorsement, but no later than dd.mm.yyyy (date of applicability + 3 years).

The competent authorities shall convert the privileges of holders of the Ground Movement Surveillance (GMS) rating endorsement issued before dd.mm.yyyy (date of applicability) into the privileges of the Aerodrome Control Surveillance (SUR) rating endorsement upon revalidation or renewal of the unit endorsement, but no later than dd.mm.yyyy (date of applicability + 3 years).

The competent authorities shall convert the privileges of holders of the Aerodrome Radar or renewal of the unit endorsement, but no later than dd.mm.yyyy (date applicability + 3 years).

The privileges of the Terminal Control (TCL) rating endorsement issued before dd.mm.yyyy (date of applicability) are included in the privileges of the Approach Control Surveillance (APS) rating and Area Control Surveillance (ACS) rating.

The privileges of the Surveillance Radar Approach (SRA) rating endorsement may be included in the privileges of an Approach Control Surveillance (APS) rating

It will be very confusing in the future for CA, TO and ANSPs not having followed the transition history. Will there be both the new and the old ratings on the first page of the licence which represent the ratings and endorsements? F.e. ADI, ADV and ADC or has the first page to be changed/re-issued?

response

Partially accepted

The text in APPENDIX 1 to Annex II, Format of the licence, item IX, will be amended and additional GM will be provided to Article 8. When converting the privileges, the competent authority should include, in item IX of the licence, the ADC rating with the date of first issue of the ADI rating, and the SUR rating endorsement with the date of first issue of the RAD rating endorsement. At the same time the ADI rating and the RAD rating endorsement should be removed. The ADV rating should be removed from item IX, except for those ATCOs that hold a valid unit endorsement attached to the ADV rating.



GMC, AIR, TWR and GMS rating endorsements should be removed from item IX at the time of conversion of ADI to ADC. The TCL rating endorsement should be removed from item IX upon revalidation or renewal of the unit endorsement, but no later than dd.mm.yyyy (date of applicability + 3 years).

comment	130	comment by: <i>skeyes</i>
	It will be very confusing in the future for CA, TO and ANSPs not having followed the transition history. Will there be both the new and the old ratings on the first page of the licence which represent the ratings and endorsements? F.e. ADI, ADV and ADC or has the first page to be changed/re-issued?	
response	<i>Partially accepted</i>	
	Please refer to the response provided to comment #76.	

comment	160	comment by: <i>AESA/DSANA</i>
	Article 8 Conversion and inclusion of privileges	
	COMMENT The privileges of holders of the GMS and RAD rating endorsements shall be converted into the privileges of the SUR rating endorsement, how will this process be?	
	JUSTIFICATION The privileges of holders of GMS are very different from the privileges of holders of RAD.	
response	<i>Partially accepted</i>	
	Please see the responses provided to comments # 226 and #76.	

comment	161	comment by: <i>AESA/DSANA</i>
	Article 8 Conversion and inclusion of privileges	
	COMMENT For SRA, why it is indicated: "The privileges of the Surveillance Radar Approach (SRA) rating endorsement may be included in the privileges of an Approach Control Surveillance (APS) rating" whereas for AIR, GMC and TWR it is used "are included in" ADC, and for TCL it is also used "are included in"?	
	JUSTIFICATION	



response	<p>Different interpretation of the different requisites</p> <p><i>Noted</i></p> <p>Based on the received comments ,the proposal to remove the SRA rating endorsement has been withdrawn and the text will be changed accordingly.</p> <p>The difference was that the initial training for former ADI, now ADC, includes training for TWR and thus also for AIR and GMC. It can therefore be stated that the privileges are included in the ADC rating privileges, whereas the training for SRA is not included in the initial training for the APS rating and the privileges can therefore be included only in case training for SRA has been completed. AMC1 ATCO.D.055(b)(6) DURATION OF UNIT ENDORSEMENT COURSES refers to ICAO Annex 1 where some requirements for SRA training are included.</p>
comment	<p>162 comment by: AESA/DSANA</p> <p>Article 8 Conversion and inclusion of privileges</p> <p>COMMENT</p> <p>Further guidance on how to adapt to new rating framework would be much appreciated. Detailed examples or even a workshop for this specific matter will be much appreciated, as a way to standardise the implementation of the new rating framework.</p> <p>JUSTIFICATION</p> <p>How the dates of first issue for the ratings should be managed in case of conversion to new ratings?. For example, in case of adapting old rating endorsements (ADI + ADV) with different dates of first issue into a new rating (ADC). What the date of first issue should be for ADC rating?</p>
response	<p><i>Partially accepted</i></p> <p>Please refer to the response provided to comment #76.</p>
comment	<p>205 comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</p> <p>GM1 Article 4(32) Definitions ICAO LOCATION INDICATOR, Page 23</p> <p>Currently remote tower centers (RTC) use the location indicator of the airport for which the service is provided, should this to be changed? This GM can be interpreted so that an RTC should now be named for example ESSR/ESNQ (for ATS ESNQ, provided from RTC ESSR) instead of as today where it simply says “ESNQ”.</p>
response	<p><i>Noted</i></p>



Using the location indicator of the RTC in the unit endorsement (ESSR/ESNQ) could be appropriate if the unit training plan is established for the RTC (please refer to GM1 ATCO.D.055(a) Unit training plan, UNIT TRAINING PLAN FOR A REMOTE TOWER CENTRE).
 The establishment of unit endorsements for remote aerodrome ATS will be addressed under upcoming NPAs for rulemaking tasks RMT.0624 (remote aerodrome ATS) and RMT.0668 (ATCO).

comment 206 comment by: *Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)*

Question 3 With reference to Article 7(1), Page 24
 Sweden has ceased converting certificates issued under (EU) 805/2011, we therefore consider that this paragraph can be removed.

response *Noted*

comment 238 comment by: *French DGAC*

P. 27 GM1 Article 8 Adaptation of privileges - ADAPTATION OF RATINGS AND RATING ENDORSEMENTS - Table

As we mentioned above, this table illustrates that the nuance of the GMS or RAD privileges is lost due to merging both endorsement rating. We can see that a result, the combination of ADC/SUR for example will convey no information on the privileges detained by the ATCO.

response *Partially accepted*

Please refer to the response provided to comment #226.

comment 272 comment by: *GATE Aviation Training*

· GM1 Article 8(3) Adaptation of privileges:
 Typo – TWT instead of TWR

response *Accepted*

Typo will be corrected.



comment	<p>13 comment by: <i>DFS Deutsche Flugsicherung GmbH</i></p> <p>ATCO.A.010 (b) When it comes to revalidation of STDI or ASE, who is responsible? According to ATCO.A.005 the application for revalidation shall be submitted to the competent authority which issued that licence. This differentiation from point (a) does not seem to make sense, since the refresher training and revalidation is subject to the ANSP (and the CA) where the STDI/ASE exercises the privileges. We suggest to delete point b) and have these cases also covered under (a).</p>
response	<p><i>Noted</i></p> <p>ATCO.A.005 remains valid and the competent authority that issued the licence remains responsible for the revalidation of the STDI/assessor endorsement. ATCO.OR.C.010(f) requires training organisations to ensure that practical instructors and assessors successfully complete refresher training in order to revalidate the respective endorsement but it does not require the training organisation in question necessarily to arrange that refresher training. This could be up to the contractual agreement between the training organisation and the instructor/assessor.</p> <p>The competent authority that issued the licence should revalidate the instructor/assessor endorsement upon receipt of a certificate on successful completion of the refresher training.</p> <p>Point (a) has been amended to indicate that the change of competent authority is required for the exercise of the unit endorsement privileges.</p>

comment	<p>24 comment by: <i>ENAIRE</i></p> <p>ATCO.A.010 (b) Notwithstanding point (a), a change of the competent authority is not required when only synthetic training device instructor or assessor privileges, or privileges of a student air traffic controller licence, are exercised. Comment: When it comes to revalidation of STDI or ASESSOR: According to ATCO.A.005 the application for revalidation shall be submitted to the competent authority which issued that licence. This differentiation from point (a) does not seem to make sense, since the refresher training and revalidation is subject to the ANSP where the STDI/ASESSOR exercises the privileges. We suggest to delete point b) and have these cases also covered under (a).</p>
response	<p><i>Noted</i></p> <p>Please refer to the response provided to comment #13.</p>

comment

25

comment by: ENAIRE

ATCO.A.010 (b)

Notwithstanding point (a), a change of the competent authority is not required when only synthetic training device instructor or assessor privileges, or privileges of a **student air traffic controller licence**, are exercised.

Comment: When it comes to revalidation of SATCO, how is it possibly for an ANSP to have the information of the contents of initial training? If: ATCO.D.010.(e) *Basic and/or rating training may be complemented with subjects, topics and subtopics that are additional or specific to the Functional Airspace Block (FAB) or to the national environment.*

Seems to be optional.

Maybe is considered to change for initial training and consider that *Functional Airspace Block (FAB) or to the national environment*, will be already included in unit training.

Also, according ATCO.AR.D.003 Change of competent authority (a) Upon receiving a licence holder's request for a change of competent authority, the receiving competent authority shall, without undue delay, request the competent authority of the licence holder to transfer, without undue delay all of the following: (1) a **verification of the licence;**

For an ANSP that is receiving the SATCO is necessary from national Supervising Authority the verification of the license, as ANSP does not have relation with the transferring competent authority.

Suggested resolution: FAB and national environment should be considered is part of unit training. If not, could be necessary to convert licence of SATCO in orden NA and ANSP have all the relevant information.

Apart from that, we suggest to delete point b) and have these cases also covered under (a).

response

Noted

Student air traffic controller licences are not revalidated.

If the (student) air traffic controller has received training specific to the Functional Airspace Block (FAB) or to the national environment in the licence issuing Member State before change of competent authority, this should be irrelevant to the receiving Member State because the training is additional, supplementing the initial training that the mutual recognition is based on.

Basically, training that is specific to the Functional Airspace Block or to the national environment should be part of the unit training. However, ATCO.D.010(e) gives a possibility to provide this training as part of initial training, as it may be easier for the training organisations to provide this kind of training to a larger group of students at the same time.

To ensure that all trainees receive this training, ATCO.D.060(f) sets a requirement to include training specific to the FAB or to the national environment in the unit endorsement course for trainee (student) ATCOs whose licence has been issued by another Member State.



If there is any additional need, the ANSP/TO can always ask their competent authority to verify the licence information with the issuing competent authority.

Please also see the answer provided to comment #13.

comment 42 comment by: *Civil Aviation Authority the Netherlands*

ATCO.A.010

What in case an ATCO from a Member State (without STDI privileges) joins another Member State to start as an STDI (first issue of STDI endorsement). Not clear how this should be handled?

Proposal:

Accept an STDI certificate for those foreign ATCOs for whom no exchange of licence is performed.

response *Noted*

The ATCO could, after successful completion of the STDI training, apply for an STDI endorsement to the competent authority that issued the licence. He or she could also apply for change of competent authority and issue of the STDI endorsement by the new competent authority, if the intention is to use the privileges in the other (new) Member State.

comment 43 comment by: *Civil Aviation Authority the Netherlands*

ATCO.A.010(b)

If the licence holder has an ATCO licence (so not a Student ATCO licence), is undergoing unit training considered as exercising the privileges as a student ATCO licence? In that case a change of CA should also not be required until the issue of the new unit endorsement! One may conclude this reading the rationale (and paragraph 2.4.2 'Why and what'), but the rule itself is not that clear.

Explain in GM that the rule is applicable to holders of both Student ATCO Licences and ATCO licences.



response

Accepted

The conclusion is correct. This should be clear by reading ATCO.A.010(b) and ATCO.B.005(b) but for clarification new GM will be added.

In addition, point (a) of ATCO.A.010 has been amended to indicate that the change of competent authority is required for the exercise of the unit endorsement privileges.

comment

48

comment by: *CANSO*

ATCO.A.010 (b)

When it comes to revalidation of STDI or ASE, who is responsible? According to ATCO.A.005 the application for revalidation shall be submitted to the competent authority which issued that licence.

This differentiation from point (a) does not seem to make sense, since the refresher training and revalidation is subject to the ANSP (and the CA) where the STDI/ASE exercises the privileges.

We suggest to delete point b) and have these cases also covered under (a).

response

Noted

Please refer to the response provided to comment #13.

comment

66

comment by: *CANSO*

ATCO.A.010 (b)

Notwithstanding point (a), a change of the competent authority is not required when only synthetic training device instructor or assessor privileges, or privileges of a **student air traffic controller licence**, are exercised.

ATCO.A.010 (b)

When it comes to revalidation of SATCO, how is it possible for an ANSP to have the information of the contents of initial training? If: ATCO.D.010.(e) *Basic and/or rating training may be complemented with subjects, topics and subtopics that are additional or specific to the Functional Airspace Block (FAB) or to the national environment.*

Seems to be optional.

Maybe is considered to change for initial training and consider that *Functional Airspace Block (FAB) or to the national environment*, will be already included in unit training.

Also, according ATCO.AR.D.003 Change of competent authority (a) Upon receiving a licence holder's request for a change of competent authority, the receiving



	<p>competent authority shall, without undue delay, request the competent authority of the licence holder to transfer, without undue delay all of the following: (1) a verification of the licence;</p> <p>For an ANSP that is receiving the SATCO is necessary from national Supervising Authority the verification of the license, as ANSP does not have relation with the transferring competent authority.</p> <p>FAB and national environment should be considered is part of unit training. If not, could be necessary to convert licence of SATCO in orden NA and ANSP have all the relevant information.</p> <p>Apart from that, we suggest to delete point b) and have these cases also covered under (a).</p>
response	<p><i>Noted</i></p>
	<p>Please refer to the response provided to comment #25.</p>
comment	<p>163 comment by: AESA/DSANA</p> <p>ATCO.A.010 Change of competent authority</p> <p>COMMENT The title of ATCO.A.010 and ATCO.AR.D.003 will be the same?</p>
response	<p><i>Accepted</i></p>
	<p>The title of ATCO.A.010 will be changed to 'Application for change of competent authority' to clarify.</p>
comment	<p>240 comment by: French DGAC</p> <p>P. 30 ATCO.A.010 Change of competent authority (a)</p> <p>Can EASA please confirm that a new licence will indeed still be issued in the process of a change of authority, as was the case with the exchange of licence process?</p> <p>Besides, the new wording of ATCO.A.010 makes it less clear why this provision is in Annex I Part ATCO, instead of Annex II Part ATCO.AR, when its scope is the competent authority.</p> <p>We suggest transferring it to Part ATCO.AR, and possibly simply mentioning the possibility of exchanging a licence in Part ATCO.</p>
response	<p><i>Noted</i></p>



The requirement to exchange the licence (i.e. issuance of a new licence) is included in the authority requirements in ATCO.AR.D.003.

Annex I (Part ATCO) contains the requirements applicable from the perspective of the licence holder to request for a change of competent authority. ATCO.A.010 makes reference to ATCO.AR.D.003 in Annex II (Part ATCO.AR), which in turn contains the respective authority requirements to handle the request of the licence holder appropriately. The title of ATCO.A.010 will be changed to 'Application for change of competent authority' to make it clearer.

comment

241

comment by: *French DGAC*

P. 30 ATCO.A.010 Change of competent authority (b)

The wording is unclear. Are the assessor privileges that can be exercised without a change of competent authority limited to synthetic training device assessor privileges (STDI)?

Or should we understand that the phrase means: "...synthetic training device instructor on the one hand, or assessor on the other hand, privileges..."

response

Accepted

The wording has been amended to clarify that the exercise of the STDI or assessor privileges without a change of the competent authority is limited to the cases where privileges are exercised in a synthetic training device environment. Please also refer to the response provided to comment #291.

comment

291

comment by: *Danish Civil Aviation and Railway Authority*

Could the interpretation of ATCO.A.010 be more clarified by reading?

If the licence holder is to exercise the privileges of [a unit endorsement] [(further specifications?)] [for] the licence in a Member State for which the competent authority is not the one

Rationale: The text would then indicate the enhanced mobility for instructors and assessors, and explicitly indicate that an exchange is only necessary for exercising the privileges of a unit endorsement.

response

Accepted

The text in point (a) of ATCO.A.010 is amended as suggested by the commentator to refer to unit endorsement privileges. Please also refer to the response provided to comment #241.



ANNEX I (PART ATCO)

p. 28

comment	239	comment by: <i>French DGAC</i>
	It seems necessary to allow an entry into force 6 months after publication, because of IT developments necessary for the issuance or revalidation of the new ratings, rating endorsements and unit endorsements.	
response	<i>Noted</i>	
	Article 8 provides for a transitional period of up to 3 years.	

GM1 ATCO.A.015(b) Exercise of the privileges of licences and provisional inability

p. 30

comment	9	comment by: <i>Croatian Civil Aviation Agency</i>
	The only comment is to take into account that there might be different reasons for provisional inability. This GM is based on medical reasons. As it is now written, for any reason (doubt about being able to safely exercise the privileges of the licence), i.e. safety issues, doubt of supervisor or any other reason which is not medically connected, the provisional inability should remain applicable until a medical review by an AME takes place.	
	Please consider to change text to be applicable when medical reasons apply.	
response	<i>Partially accepted</i>	
	Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.	
comment	27	comment by: <i>ENAIRE</i>
	GM1 ATCO.A.015(b), (c) <i>Provisional inability should only cover short periods of time with the aim of allowing the affected ATCO to consult the AME regarding the doubts about being able to safely exercise the privileges of the licence.</i> <i>The provisional inability should only remain applicable until a medical review by an AME takes place.</i>	



	<p>We welcome this point, but we miss more clarification about the process between AME REVIEW considering there are no doubts and Medical authority to validate again MEDICAL conditions. ¿which is the consequence for ATCO meanwhile, continues with Incapacity due administrative reasons? That could affect the requirements for revalidation (i.e: noat able to be assessed with live traffic on time for revalidation and losing unit endorsement.</p> <p>It would be necessary to include a paragraph or a line to insist that in order not to affect ATCO and his license, the administrative processes of the authority will be carried out with agility. Delay could be directly linked to the competence of the ATCOs.</p> <p>Suggested resolution: Consider to include relation with ATCO.AR or ATCO.MED in order to minimise the period of time related with this medical reviews and dilatory administrative processes.</p>
<p>response</p>	<p><i>Partially accepted</i></p>
	<p>Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p> <p>Further alignment between Part.MED and ATCO.MED will be achieved by RMT.0424 starting in 2023.</p>
<p>comment</p>	<p>41 comment by: <i>Civil Aviation Authority the Netherlands</i></p> <p>GM1 ATCO.A.015(a)</p> <p>When exercising assessor privileges for the purpose of issue or renewal of a unit endorsement, a valid medical should also not be required if an OJTI with valid medical certificate is present for ensuring supervision on the working position.</p> <p>New proposal: MEDICAL CERTIFICATE The medical certificate is not required when exercising instructor or assessor privileges in a synthetic training device environment. A valid medical certificate should also not be required when exercising assessor privileges during OJT if an OJTI with valid medical certificate is present for ensuring supervision on the working position.</p>
<p>response</p>	<p><i>Not accepted</i></p>
	<p>This proposal was already discussed during the preparation of the NPA, but the suggestion was not supported by the group of focal points for the reason of altering the allocated responsibilities and increasing the risks within the operational environment.</p>



comment	58	comment by: CANSO
	<p>GM1 ATCO.A.015(a) When exercising assessor privileges for the purpose of issue or renewal of a unit endorsement, a valid medical should also not be required if an OJTI with valid medical certificate is present for ensuring supervision on the working position.</p> <p>Suggested Resolution</p> <p>New proposal: MEDICAL CERTIFICATE The medical certificate is not required when exercising instructor or assessor privileges in a synthetic training device environment. A valid medical certificate should also not be required when exercising assessor privileges during OJT if an OJTI with valid medical certificate is present for ensuring supervision on the working position.</p>	
response	<p><i>Not accepted</i></p> <p>Please refer to the response provided to comment #41.</p>	

comment	67	comment by: CANSO
	<p>GM1 ATCO.A.015(b), (c)</p> <p>Provisional inability should only cover short periods of time with the aim of allowing the affected ATCO to consult the AME regarding the doubts about being able to safely exercise the privileges of the licence. The provisional inability should only remain applicable until a medical review by an AME takes place.</p> <p>We welcome this point, but we miss more clarification about the process between AME REVIEW considering there are no doubts and Medical authority to validate again MEDICAL conditions. Which is the consequence for ATCO meanwhile, continues with Incapacity due administrative reasons? That could affect the requirements for revalidation (i.e: not able to be assessed with live traffic on time for revalidation and losing unit endorsement).</p> <p>It would be necessary to include a paragraph or a line to insist that in order not to affect ATCO and his license, the administrative processes of the authority will be carried out with agility. Delay could be directly linked to the competence of the ATCOs Consider to include relation with ATCO.AR or ATCO.MED in order to minimise the period of time related with this medical reviews and dilatory administrative processes</p> <p>Consider to include relation with ATCO.AR or ATCO.MED in order to minimise the period of time related with this medical reviews and dilatory administrative processes</p>	



response *Partially accepted*

Please refer to the response provided to comment #27.

comment

121

comment by: *German NSA (BAF)*

Comment on GM1 ATCO.A.015(b), (c) Exercise of the privileges of licenses and provisional inability (page 33):

This could be interpreted differently within member states. When is it necessary to consult an AME? Is it necessary to consult an AME in case of a regular flu or cold?

response

Partially accepted

Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.

comment

133

comment by: *skeyes*

Provisional inability is about the doubt that arises concerning the ability to safely exercise the privileges of the licence (ATCO .A.015 (b))

This is not reflected in the GM1 ATCO.A.015 (b)

This part only refers to

(a) psycho active substance abuse

(b) medical issues

(c) not meeting the requirements of the UCS. These points describe the situation after the doubt. When the doubt has been confirmed and the ATCO is declared inapt. What with the (sudden) doubt that arises on safely exercising the privileges? This is not retaken in the GM.

There is a need for an elaborated process:

to confirm the provisional inability, in that case the status changes from “doubt” into “inability”.

To be allowed to exercise the privileges of the license (become “apt”) again;

These processes need to guarantee fair treatment.

In case of a medical doubt, reference should be made to Part-MED.

Point (a) needs further clarification, (proven) abuse of psycho active substances does not imply a doubt, but rather an inability.

What is meant with point (c)?



	<p>The way it is represented suggests that only when not exercising the privileges of the licence for more than 90 calendar days, not having the required numbers of hours over the 12 preceding months or not being assessed as competent is a provisional inability situation.</p> <p>Point (c) should be clarified</p> <p>The ability and required objective processes and procedures for the ATCO, colleague, management to raise a doubt on the competences in relation to the obligatory competency framework should continue to exist.</p>
response	<p><i>Partially accepted</i></p>
	<p>Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p> <p>Regarding point(1)(c), the attention is drawn to the fact that it refers to all competence-related requirements set out in the unit competence scheme as a potential example of grounds for doubting the ability to safely exercise the privileges of the licence. Examples in this context are not exhaustive. The relevant procedures shall be elaborated according to ATCO.A.015(d).</p>

comment	<p>134</p> <p style="text-align: right;">comment by: <i>skeyes</i></p>
	<p>GM1 ATCO.A.015 (b), (c) Applicability of provisional inability</p> <p>We support the idea that the ATCO for whom a doubt on the ability of safely exercising the privileges of the licence arises, has the obligation to seek the advice of the AME.</p> <p>The determination of a maximum period is also relevant.</p> <p>Confirm that advice from AME should be sought for cases of Provisional Inability which are of non-medical nature e.g. not meeting the requirements from the unit competence scheme?</p> <p>We understand from the way it is drafted today that the provisional inability ends when the AME revalidates the medical licence. This seems correct for provisional inability situations solely linked to medical doubts, but if the provisional inability is linked to UCS requirements; the AME should not be able to end this. There is no guarantee that the ATCO is able to safely exercises the privileges of his licence.</p> <p>There should be a competency assessment to ensure the doubt does no longer exist. This should be done in a described process to allow for fair treatment and to safeguard at all time ATC.</p> <p>Unless due to the duration of the period or the circumstance of being inapt to exercise the privileges of the license, the requirements from the UCS become applicable.</p>



	<p>Suggestion: "Provisional inability should only remain applicable until a medical review by an AME takes place" should be <u>rephrased</u> as:</p> <p>"Provisional inability <u>regarding the medical</u> status should only remain applicable until a medical review by an AME takes place"</p> <p>Also, the regulation should impose that:</p> <p>Notwithstanding the revalidation of the medical certificate, a competency assessment process to terminate the provisional inability in relation to the competency framework (able to safely exercise the privileges of the license), if applicable, should be obligatory.</p>
response	<p><i>Partially accepted</i></p> <p>Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p>
comment	<p>146 comment by: <i>CANSO</i></p> <p>GM1 ATCO.A.015 (b) The case of provisional inability due to something else than medical factors seems to have disappear on GM1 ATCO A.015 (b). We need to get a clear définition and need to write that it can be recovered by someonelese than an AME if it's not medical.</p>
response	<p><i>Partially accepted</i></p> <p>Please refer to the response provided to comment #200.</p>
comment	<p>164 comment by: <i>AESA/DSANA</i></p> <p>GM1 ATCO.A.015(b), (c) Exercise of the privileges of licenses and provisional inability</p> <p>COMMENT "Provisional inability should only cover short periods of time...". We suggest defining more in detail the meaning of short periods of time or defining a maximum period of time, for example.</p> <p>JUSTIFICATION Many discussions will raise with ANSPs in order to define what to consider as short periods of time.</p>
response	<p><i>Partially accepted</i></p>

Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.

comment

165

comment by: AESA/DSANA

GM1 ATCO.A.015(b), (c) Exercise of the privileges of licenses and provisional inability

COMMENT

It is mandatory to pass a medical exam to finish the provisional inability? It is not necessary for the cases detailed in GM1 ATCO.A.015 b) (b)-(c)

JUSTIFICATION

There are cases of provisional inability not derived of medical causes: not meeting all the competence-related requirements set out in the unit competence scheme or other issues identified by the ANSP related with SMS

response

Partially accepted

Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.

comment

200

comment by: DSNA/SDRH

The case of provisional inability due to something else than medical factors seems to have disappear on GM1 ATCO A.015 (b). We need to get a clear définition and need to write that it can be recovered by someone else than an AME if it's not medical.

response

Partially accepted

Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.

comment

300

comment by: FOCA Switzerland

NPA (a, b, c, d, e, f, g)	Reference (Chapter and page)	Text NPA	Proposal FOCA	Justification

2021-08	GM1 ATCO.A.015(b), (c) Exercise of the privileges of licenses and provisional inability	APPLICABILITY OF PROVISIONAL INABILITY Provisional inability should only cover short periods of time with the aim of allowing the affected ATCO to consult the AME regarding the doubts about being able to safely exercise the privileges of the licence. The provisional inability should only remain applicable until a medical review by an AME takes place.	The scope should not be limited to medical issues and the visit with the AME. There are other areas that could lead to provisional inability, such as deterioration of: - Language proficiency - Skill - Knowledge	According to the definition in article 4 'provisional inability' means a temporary state in which the licence holder is prevented from exercising the privileges of the licence when ratings, endorsements and his/her his or her medical certificate are valid; Therefore, to limit provisional inability to a medical issue does not cover the full scope of the definition.
response	<i>Partially accepted</i>			
	Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.			

ATCO.A.015 Exercise of the privileges of licences and provisional inability p. 30

comment	26	comment by: <i>ENAIRE</i>
response	GM1 ATCO.A.015(a): We welcome this GM. <i>Noted</i>	



comment 77

comment by: CANSO

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

(a)

The exercise of the privileges granted by a licence shall be dependent on the ratings and rating endorsements, validity of the ratings, unit and licence endorsements, and, where applicable, of the medical certificate.

(b)

Licence holders shall not exercise the privileges of their licence when having doubts of being able to safely exercise the privileges of the licence and shall in such cases immediately notify the relevant air navigation service provider of the provisional inability to exercise the privileges of their licence.

(c)

Air navigation service providers may declare the provisional inability of the licence holder if they become aware of any doubt concerning the ability of the licence holder to safely exercise the privileges of the licence.

...

(d)

Air navigation service providers shall develop and implement objective, transparent and non-discriminatory procedures to enable licence holders declaring provisional inability to exercise the privileges of their licence in accordance with point (b), to declare the provisional inability of the licence holder in accordance with point (c), ~~to manage the operational impact of provisional inability cases~~ and to inform the competent authority as defined in that procedure.

Provisional inability is about the doubt that arises concerning the ability to safely exercise the privileges of the licence (ATCO .A.015 (b))

This is not reflected in the GM1 ATCO.A.015 (b)

This part only refers to

(a) psycho active substance abuse

(b) medical issues

(c) not meeting the requirements of the UCS. These points describe the situation after the doubt. When the doubt has been confirmed and the ATCO is declared inapt. What with the (sudden) doubt that arises on safely exercising the privileges? This is not retaken in the GM.

Point (a) needs further clarification, (proven) abuse of psycho active substances does not imply a doubt, but rather an inability.

There is a need for an elaborated process:

1. (1) to confirm the provisional inability, in that case the status changes from "doubt" into "inability".

	<p>2. (2) To be allowed to exercise the privileges of the license (become “apt”) again;</p> <p>These processes need to guarantee fair treatment.</p> <p>In case of a medical doubt, reference should be made to Part-MED.</p> <p>What is meant with point (c)? The way it is represented suggests that only when not exercising the privileges of the licence for more than 90 calendar days, not having the required numbers of hours over the 12 preceding months or not being assessed as competent is a provisional inability situation.</p> <p>Point (c) should be clarified The ability and required objective processes and procedures for the ATCO, colleague, management to raise a doubt on the competences in relation to the obligatory competency framework should continue to exist.</p>
response	<p><i>Partially accepted</i></p>
	<p>Instead of proposing new material and based on the comments received, the existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p> <p>Regarding point(1)(c), the attention is drawn to the fact that it refers to all competence-related requirements set out in the unit competence scheme as a potential example of grounds for doubting the ability to safely exercise the privileges of the licence. Examples in this context are not exhaustive. The relevant procedures shall be elaborated according to ATCO.A.015(d).</p>

comment	<p>123 comment by: <i>German NSA (BAF)</i></p>
	<p>Comment on GM1 ATCO.A.015(a) Exercise of the privileges of licences and provisional inability (page 32):</p> <p>In general, this is a reasonable addition but it must also be implemented in the regulatory text, i.e. ATCO.A.015 (a) needs to be rephrased, as “where applicable” (ATCO.A.015 (a)) cannot be defined through GM only.</p> <p>The new ATCO.A.015 (a) including the GM however are in contradiction to ATCO.MED.A.030 Medical certificates: „(a) Applicants for and holders of an air traffic controller licence, or student air traffic controller licence, shall hold a class 3 medical certificate.“ As STDI/ASS etc. are license endorsements, one needs to hold a license to gain these privileges but would still be hindered to exercise them based on the requirement of holding a medical certificate.</p>
response	<p><i>Accepted</i></p>



Text in ATCO.A.015 and ATCO.MED.A.030 changed.

comment	132	comment by: <i>skeyes</i>
	<p>Provisional inability is about the doubt that arises concerning the ability to safely exercise the privileges of the licence (ATCO .A.015 (b))</p> <p>This is not reflected in the GM1 ATCO.A.015 (b)</p>	
response	<i>Noted</i>	
	<p>The existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p>	

comment	204	comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i>
	<p>GM1 ATCO.A.010 Change of competent authority, Page 30 Use of “shall” in a GM.</p>	
response	<i>Accepted</i>	

comment	253	comment by: <i>BCAA</i>
	<p>The definition of provisional inability is not amended in this NPA, leaving different interpretations possible. The additional guidance material GM1 ATCO.A.015(b),(c) states that provisional inability should only cover short periods of time and only until a medical review takes place. As this is only on the level of guidance material, ANSPs are not obliged to adhere. Preferably the definition of provisional inability is to be rewritten more strictly to have only one fixed interpretation.</p>	
response	<i>Noted</i>	
	<p>The flexibility is needed for operational reasons.</p> <p>The existing GM has been amended to provide more clarity on the duration and on the handling of the provisional inability cases related to medical reasons by providing examples.</p>	



ATCO.B.001 Student air traffic controller licence

p. 32

comment 14 comment by: *DFS Deutsche Flugsicherung GmbH*

ATCO.B.001 (d)
 "... may only start on-the-job training after an assessment..."
 The Rationale box below "GM1 ATCO.B.005(e)" clearly explains that any learning phase between issue of student licence and OJT (e.g. theoretical, transitional training and pre-OJT) is not meant to be the starting point.
 DFS suggests to keep this clarification as given in the rationale with a related GM.

response *Accepted*

New GM has been introduced containing a modified text of the rationale.

comment 29 comment by: *ENAIRE*

The Rationale box below "GM1 ATCO.B.005(e)" explains that a student licence is not needed for transitional phase. What happened with pre-OJT?
 ENAIRE suggest clarifying if the APC shall be realised before OJT or PRE-OJT.

response *Accepted*

It is recognised that this was not clearly reflected in the rationale, but the issue is explained in further detail in the amended provisions on prerequisites of unit training (ATCO.D.050). New GM has been introduced containing a modified text of the rationale.

comment 49 comment by: *CANSO*

ATCO.B.001 (d)
 "... may only start on-the-job training after an assessment..."
 The Rationale box below "GM1 ATCO.B.005(e)" clearly explains that any learning phase between issue of student licence and OJT (e.g. theoretical, transitional training and pre-OJT) is not meant to be the starting point.
 CANSO suggests to keep this clarification as given in the rationale with a related GM

response *Accepted*

Please refer to the response provided to comment #14.



comment	<p style="text-align: right;">comment by: <i>CANSO</i></p> <p>69</p> <p>ATCO.B.001 Student air traffic controller licence 32 The Rationale box below "GM1 ATCO.B.005(e)" explains that a student licence is not needed for transitional phase. What happened with pre-OJT? CANSO suggest clarifying if the APC shall be realised before OJT or PRE-OJT. Clarify if the APC shall be realised before OJT or PRE-OJT.</p> <p>Clarify if the APC shall be realised before OJT or PRE-OJT</p>
response	<p><i>Accepted</i></p> <p>Please refer to the response provided to comment #29.</p>

comment	<p style="text-align: right;">comment by: <i>SMATSA</i></p> <p>153</p> <p>∅ Rationale — ATCO.B.001, ATCO.B.005 and associated GM and ATCO.D.050</p> <p>It is not clear where has been clarified that a student ATCO licence is required for on-the-job training and not necessarily for the transitional phase of unit training. According to ATCO.D.005 transitional training phase is mandatory part of unit training.</p> <p>In proposal of ATCO.D.050 (a) it is said that unit training may only be started by persons who have successfully completed initial training relevant to the rating and, if applicable, rating endorsement. Outcome of successfully completed initial training is student air traffic controller licence. In proposal of ATCO.D.050 (b) it is said that the on-the-job training phase of unit training may only be started by persons who are holders of a student air traffic controller licence or an air traffic controller licence with the appropriate rating and, if applicable, rating endorsement.</p> <p>According to ATCO.D.050 (a) person need to have student air traffic controller licence before starting unit training (transitional and OJT phase). According to ATCO.D.050 (b) person need to have student air traffic controller licence before starting on-the-job training phase of unit training. ATCO.D.050 (a) and ATCO.D.050 (b) stand in contradiction to each other. Taking into account above said we propose that prerequisites for unit training remain unchanged.</p>
response	<p><i>Noted</i></p> <p>ATCO.B.001(a) states that holders of a student air traffic controller licence are authorised to provide air traffic control services under the supervision of an on-the-job training instructor. As the student air traffic controllers are not providing any services under transitional and pre-on-the-job training, it should be clear that the</p>



student air traffic controller licence is required for the on-the-job training phase. This has been further clarified in the amended ATCO.D.050.

While it is true that the outcome of successfully completed initial training is a student air traffic controller licence, the administration related to the licence issue may take some time. The purpose of amended ATCO.D.050 (a) is to allow a person who has successfully completed the initial training to start unit training (transitional and pre-on-the-job training) while waiting for the licence to be issued.

comment	<p>166</p> <p style="text-align: right;">comment by: AESA/DSANA</p> <p>ATCO.B.001 Student air traffic controller licence ATCO.B.005 Air traffic controller licence ATCO.B.010 Air traffic controller ratings</p> <p>COMMENT There are different meanings for “assessment” in Article 4: Definitions and in GM1 ATCO.B.001 (d), GM1 ATCO.B.005 (e), GM1 ATCO.B.010 (b). It is used "evaluation" in these GMs, it would be better to use "assessment" and "examination"</p> <p>JUSTIFICATION ‘assessment’ means an evaluation of the practical skills leading 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; ‘examination’ means a formalised test evaluating the person's knowledge and understanding; GM1 ATCO.B.001(d), GM1 ATCO.B.005(e) and GM1 ATCO.B.010 (b) "Student air traffic controller licence ASSESSMENT OF PREVIOUS COMPETENCE: The assessment of previous competence should include an evaluation of the practical skills demonstrated by the person being assessed as well as an evaluation of the person’s knowledge and understanding."</p>
response	<p><i>Accepted</i></p> <hr/> <p>Wording in the GM has been changed.</p>

comment	<p>216</p> <p style="text-align: right;">comment by: ENAC DGAC</p> <p>As in France the ATCOs are delivered the ADV, ADI, APP, APS, ACP and ACS ratings, they cannot start an on-the-job training in the rating within 1 year after the issue. We suggest to extend this duration to 2 years after the issue of the rating.</p>
response	<p><i>Not accepted</i></p>



1 year was considered an appropriate time by the group of experts taking into account that the erosion of skills is likely to happen within a fairly short period of time as no routine has yet been accumulated by the students. There is no change proposed in regard the time, which is also currently 1 year.

comment	<p>278</p> <p style="text-align: right;">comment by: <i>GATE Aviation Training</i></p> <p>Why in point b(2) the time is stated in month – 12 months and in d) in years – 1 year? Exercising the privileges of the student licences is now related only to OJT. What if TT and Pre-OJT are longer than 1 year? In such a case, if the OJT is not started within 1 year due to long TT and Pre-OJT there should be an assessment of previous competence moreover performed by TO certified to provide initial training although the person is in other phase of unit training? Same applies for ATCO.B. 005 (e).</p>
response	<p><i>Noted</i></p> <p>The 12-month interval shall be used in some cases to avoid possible misinterpretation of a calendar year.</p> <p>The duration of transitional and pre-on-the-job training is highly unlikely to be more than 1 year. EASA is not aware of any such case.</p>

SUBPART B - LICENCES, RATINGS AND ENDORSEMENTS	p. 32
---	-------

comment	<p>221</p> <p style="text-align: right;">comment by: <i>CAA Norway</i></p> <p>Its proposed in the the NPA that previous ratings and endorsements are kept and marked with (*).</p> <p>Would it be beneficial to set a time limit for record keeping in the licences for previous ratings and endorsements that no longer exists and/or validation have expired?</p> <p>This will be information that CA may issue based on requests. In general, and to avoid unnecessary outdated information, licences should only have valid ratings and endorsements.</p>
response	<p><i>Partially accepted</i></p> <p>Please refer to the response provided to comment #76.</p>

ATCO.B.005 Air traffic controller licence	p. 33
--	-------



comment 15 comment by: *DFS Deutsche Flugsicherung GmbH*

ATCO.B.005 (e)
 "... may only start on-the-job training after an assessment..."
 The Rationale box below "GM1 ATCO.B.005(e)" clearly explains that any learning phase between issue of ATCO rating and OJT (e.g. theoretical, transitional training and pre-OJT) is not meant to be the starting point.
 DFS suggests to keep this clarification as given in the rationale with a related GM.

response *Accepted*

Please refer to the response provided to comment #14.

comment 28 comment by: *ENAIRE*

GM1 ATCO.B.005(e)
*The assessment of previous competence should include an evaluation of the practical skills demonstrated by the person being assessed as well as an **evaluation of the person's knowledge and understanding.***

According The Rationale box below "GM1 ATCO.B.005(e)", this new GM indicates that includes "examination of theoretical knowledge"; ... *assessment of previous competence clarifies that the word 'assessment' is used here in its general meaning thus also including examination of theoretical knowledge.*

But according definitions it could be understood wit that GM that is possible simply evaluate practical knowledge and understanding:

Article 4. Definitions, point 6. "assessment' means an evaluation of the practical skills leading 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

We request clarify the accurate intention of the GM (practical assessment and/or theoretical examination?). How to understand in this point the terms assessment/evaluation may be interpreted differently, always generates confusion?

Suggested resolution: Clarify in GM a bit more the aim: if only examination is enough is it needed an assessor? For instance, add to the text something more clear: practical or/and theoretical, if that is the case.

response *Accepted*

Please refer to the response provided to comment #166.

comment 30 comment by: *ENAIRE*

response	<p>The Rationale box below "GM1 ATCO.B.005(e)" explains that a student licence is not needed for transitional phase. What happened with pre-OJT? ENAIRE suggest clarifying if the APC shall be realised before OJT or PRE-OJT.</p>
	<p><i>Noted</i></p>
	<p>Please refer to the response provided to comment #29.</p>

comment	<p>31 comment by: ENAIRE</p> <p>ATCO.B.005 (e) Air traffic controller licence This point has not been modified but we suggest a clarification: <i>The holder of an air traffic controller licence who has not started exercising the privileges of any rating within one 1 year from the date of its issue may only start unit on-the-job training in that rating after an assessment of his/her his or her previous competence</i></p> <p>'Any' may cause confusion. Some ATCOS may have exercised other different ratings in their previous unit endorsements, and we understand the aim is that APC is needed if he/she has not exercised that rating he/she is going to start OJT phase (new unit training). We suggest change 'any' for 'a': <i>The holder of an air traffic controller licence who has not started exercising the privileges of any 'a' rating within one 1 year from the date of its issue may only start unit on-the-job training in that rating after an assessment of his/her his or her previous competence.</i></p>
response	<p><i>Accepted</i></p> <p>Text will be changed: 'any' will be changed to 'a'.</p>

comment	<p>68 comment by: CANSO</p> <p>GM1 ATCO.B.005(e) <i>The assessment of previous competence should include an evaluation of the practical skills demonstrated by the person being assessed as well as an evaluation of the person's knowledge and understanding.</i> According The Rationale box below "GM1 ATCO.B.005(e)" This new GM indicates that includes "examination of theoretical knowledge"; ... <i>assessment of previous competence clarifies that the word 'assessment' is used here in its general meaning thus also including examination of theoretical knowledge.</i></p> <p>But according definitions it could be understood with that GM that is possible simply evaluate practical knowledge and understanding: Article 4. Definitions, point 6. "assessment" means an evaluation of the practical skills leading to the issue of the licence, rating and/or endorsement(s) and their</p>
---------	--

revalidation and/or renewal, **including behaviour and the practical application of knowledge and understanding** being demonstrated by the person being assessed

We request clarify the accurate intention of the GM (practical assessment and/or theoretical examination?). How to understand in this point the terms assessment/evaluation may be interpreted differently, always generates confusion?

Clarify in GM a bit more the aim: if only examination is enough is it needed an assessor? For instance, add to the text something more clear: practical or/and theoretical, if that is the case.

response *Accepted*

Please refer to the response provided to comment #166.

comment **31** comment by:

The Rationale box below "GM1 ATCO.B.005(e)" explains that a student licence is not needed for transitional phase. What happened with pre-OJT?
CANSO suggest clarifying if the APC shall be realised before OJT or PRE-OJT.

Clarify if the APC shall be realised before OJT or PRE-OJT

response *Accepted*

Please refer to the response provided to comment #29.

comment **71** comment by: CANSO

ATCO.B.005 (b)

This point has not been modified but we suggest a clarification:
*The holder of an air traffic controller licence who has not started exercising the privileges of **any** rating within one 1 year from the date of its issue may only start unit on-the-job training in that rating after an assessment of his/her his or her previous competence*

Any may cause confusion. Some ATCOS may have exercised other different ratings in their previous unit endorsements, and we understand the aim is that APC is needed if he/she has not exercised that rating he/she is going to start OJT phase (new unit training).

We suggest change any for "a"

Isn't it clearer?
*The holder of an air traffic controller licence who has not started exercising the privileges of **any** "a" rating within one 1 year from the date of its issue may only start*



	<i>unit on-the-job training in that rating after an assessment of his/her his or her previous competence</i>
response	Accepted Text will be changed.

comment	147 comment by: <i>CANSO</i>
	<p>GM1 ATCO.B.005(e) Air traffic controller licence ASSESSMENT OF PREVIOUS COMPETENCE</p> <p>The assessment of previous competence should include an evaluation of the practical skills demonstrated by the person being assessed as well as an evaluation of the person’s knowledge and understanding.</p> <p>We are about to encounter a shortage of ATCO in the future. This GM will imply a great need of ATCO both for DSNA and ENAC to be enforced. DSNA is already offering a training to refresh previous competence which takes place in ENAC and is well appreciated by trainers and trainees. It is often used as we have ATCOs that move from one unit to another with different ratings. We do intend to keep it and reenforce it but we will have difficulties evaluating it. While COVID, when we had difficulties sending our ATCOs to the ENAC school, some of our units did that training and itw as obvious everony needs it. As far as 373 is concerned, we have taken into account that this GM doesn’t add any benefits to security nor any better effects on unit training. The previous competence are indeed tested when the ATCO is taking his tests in the actual unit training of its own and that is compulsory for his licence. Another test in the ATO doesn’t add anything to training and is costly in human ressources.</p>

response	Noted The requirement is not new. The new GM explains what the required assessment should include.
----------	---

comment	154 comment by: <i>SMATSA</i>
	<p>Ø Proposal for change ATCO.B.005 (e) define the holder of an air traffic controller licence who has not started exercising the privileges of any rating within 1 year from the date of its issue may only start on-the-job training in that rating after assessment of previous competence (the word unit in proposal is deleted). Proposal for change ATCO.B.010 (b) define the holder of a rating who has interrupted exercising the privileges associated with that rating for a period of 4 four or more immediately preceding consecutive years may only start unit on-the-job training in that rating after assessment of previous competence (the word unit in proposal is also deleted).</p>



	<p>The existing regulation requirements recognize two or three phases of unit training after assessment of previous competence and depending on results of competence assessment (transition, pre-OJT training if applicable, and OJT). Deleting word unit and replacing with on-the-job in these proposals may increase misunderstanding and ambiguity because there is lack of clarity about the starting point of unit training which certainly is not on-the-job training in all situations. Taking into account above we propose to remain existing solution with words unit training unchanged.</p>
response	<p><i>Not accepted</i></p>
	<p>The purpose is to clarify that the requirement refers to the start of the on-the-job training as this is also the phase for which a student ATCO licence is required. Please also see the proposed amendment of ATCO.D.050.</p>

comment	<p>201 comment by: <i>DSNA/SDRH</i></p>
	<p>GM1 ATCO.B.005(e) Air traffic controller licence ASSESSMENT OF PREVIOUS COMPETENCE :</p> <p>We are about to encounter a shortage of ATCO in the future. This GM will imply a great need of ATCO both for DSNA and ENAC to be enforced. DSNA is already offering a training to refresh previous competence which takes place in ENAC and is well appreciated by trainers and trainees. It is often used as we have ATCOs that move from one unit to another with different ratings. We do intend to keep it and reenforce it but we will have difficulties evaluating it. While COVID, when we had difficulties sending our ATCOs to the ENAC school, some of our units did that training and it was obvious everyone needs it. As far as 373 is concerned, we have taken into account that this GM doesn't add any benefits to security nor any better effects on unit training. The previous competence are indeed tested when the ATCO is taking his tests in the actual unit training of its own and that is compulsory for his licence. Another test in the ATO doesn't add anything to training and is costly in human resources.</p>
response	<p><i>Noted</i></p>
	<p>Please refer to the response provided to comment #147.</p>

ATCO.B.010 Air traffic controller ratings

p. 34

comment	<p>32 comment by: <i>ENAIRE</i></p>
	<p>The Rationale box below "GM1 ATCO.B.005(e)" explains that a student licence is not needed for transitional phase. What happened with pre-OJT? ENAIRE suggest clarifying if the APC shall be realised before OJT or PRE-OJT.</p>



response	Accepted
	Please refer to the response provided to comment #29.

comment	33	comment by: ENAIRE
	<p>Rationale — ATCO.B.010 and GM to ATCO.B.010 <i>In ATCO.B.010(b), it has also been pointed out that an assessment of previous competence is to be conducted by an initial training organisation. This is to align with similar provisions in ATCO.B.001(d) and ATCO.B.005(e).</i></p> <p>To think about; if an ATCO has exercised a rating more than 4 years ago, and the unit training includes rating, why can't be kept as previously? The unit training organisation also has the knowledge and practice about that rating.</p> <p>Suggested resolution: Consider not to change this APC by an Initial Training or be possible for both (unit training and initial training organisation).</p>	

response	Accepted
	The text will not be amended with 'initial'. EASA agrees that there is no reason to limit the providers to only initial training organisations.

comment	73	comment by: CANSO
	<p>Rationale — ATCO.B.010 and GM to ATCO.B.010 <i>In ATCO.B.010(b), it has also been pointed out that an assessment of previous competence is to be conducted by an initial training organisation. This is to align with similar provisions in ATCO.B.001(d) and ATCO.B.005(e).</i></p> <p>To think about; if an ATCO has exercised a rating more than 4 years ago, and the unit training includes rating...¿why can't be kept as previously? The unit training organisation also has the knowledge and practice about that rating.</p> <p>Consider not to change this APC by an Initial Training or be possible for both (unit training and initial training organisation).</p>	

response	Accepted
	Please refer to the response provided to comment #33.

comment	122	comment by: German NSA (BAF)
	<p>Comment on GM1 ATCO.B.010(a)(2);(3) Air traffic controller ratings (page 37):</p>	



response	<p>Can "transiting" be interpreted as being equivalent to the ACS rating? If surveillance coverage is not available entirely to the GND (e.g. due to terrain), does this require an APP rating?</p>
	<p><i>Noted</i></p>
	<p>Area control can be considered as provision of ATC to transiting aircraft. However, provision of ATC to transiting aircraft is also mentioned in the privileges of the approach control ratings.</p> <p>An APP rating is required for provision of approach control service in controlled airspace (usually not extending to GND) without the use of surveillance equipment. If there are small areas that do not have surveillance coverage, the question should in the first hand be handled from the point of view of service provision in this airspace (please refer to ATS.TR.155), which after the possible need for an APP rating could be evaluated.</p>
comment	<p>155 comment by: SMATSA</p> <p>Ø GM1 ATCO.B.010(a)(2);(3) and GM1 ATCO.B.010(a)(4);(5) proposals for change deal with refresher training for surveillance fall-back situations. Would you please clarify if this specific training related to the surveillance fall-back include practical refresher training on dedicated STD (i.e. fall-back STD)?</p>
response	<p><i>Noted</i></p>
	<p>There is no requirement on a dedicated fall-back STD.</p>
comment	<p>208 comment by: Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</p> <p>ATCO.B.001 (d) Student air traffic controller licence, page 34 Sweden in general supports that transition training can be started without a student-ATCO license, however this is only acceptable if the transition training does not include working live traffic. A student working live traffic should only do so when in possession of a valid student license and the associated medical, language and radio qualifications. Some units may include live traffic work during their transition training and the regulation does not say that there may be no live traffic portion as part of transition training. We suggest that this is clarified to ensure that nobody works live traffic without holding a student license.</p>
response	<p><i>Noted</i></p>

Training in a live traffic situation is by definition on-the-job training, whereas transitional training is designed primarily to impart knowledge and understanding, i.e. it is theoretical. Please see ATCO.D.005.

comment 279 comment by: GATE Aviation Training

In para (b) unit training should be kept and not replaced by OJT as the assessment of previous competence should indicate how the entire unit training should be designed based on the previous knowledge and skills.

response *Not accepted*

There are no provisions preventing the assessment of previous competence before the entire unit training. It could be appropriate and even necessary from the point of view of the unit training organisation. However, from the point of view of safety, it is the on-the-job training phase that is relevant and that needs to be regulated.

comment 301 comment by: FOCA Switzerland

NPA (a, b, c, d, e, f, g)	Reference (Chapter and page)	Text NPA	Proposal FOCA	Justification
2021-08 a	ATCO.B.010 (a) (1) Vs. Appendix 1 to Annex II field IX and abbreviations	Incorporation of rating ADV in rating ADC Vs. <i>Ratings and rating endorsements that are not in use anymore but have been issued before dd.mm.yyyy (date of application) will be marked with an * and maintained for tracking purposes.</i>	FOCA suggests to: - either mark previous competences with an * and keep the abbreviations of previous competences in the regulation; - OR delete all references to the previous competences (i.e. the * and abbreviation), considering the	Generally FOCA supports the NPA with the reduction of ratings and rating endorsements resp. their inclusion in other ratings / rating endorsements. Consistently, the text for ADV has been removed from ATCO.B.010 However, to keep ADV and ADI in the appendix 1 to annex II field IX with an *, as well as in the



2021-08 a	ATCO.B.010 (a) (2) Vs. Appendix 1 to Annex II field IX and abbreviations	Evolution of rating ADI to rating ADC Vs. <i>Ratings and rating endorsements that are not in use anymore but have been issued before dd.mm.yyyy (date of application) will be marked with an * and maintained for tracking purposes.</i>	fact that NSA has complete history in their licensing tool for all ATCo.	abbreviation list, creates an incoherence in the regulation, an administrative burden and consequently also a licence that depicts more than the current competencies of the ATCO.
-----------	--	--	--	--

response *Partially accepted*

Please refer to the response provided to comment #76.

ATCO.B.015 Rating endorsements

p. 36

comment 16

comment by: *DFS Deutsche Flugsicherung GmbH*

ATCO.B.015 (a)
DFS clearly welcomes the simplified presentation of the ADC rating.

The rationale box below AMC1 ATCO.B.015(a) in its last sentence refers to an AMC that will refer to ICAO Annex 1 provisions. We hope to have that AMC soon (for cases where the APS rating privileges include SRA duties).

response *Noted*

AMC1 ATCO.D.055(b)(6) is already included in the NPA.

comment 51

comment by: *CANSO*

ATCO.B.015 (a)



	DFS clearly welcomes the simplified presentation of the ADC rating.
	The rationale box below AMC1 ATCO.B.015(a) in its last sentence refers to an AMC that will refer to ICAO Annex 1 provisions. We hope to have that AMC soon (for cases where the APS rating privileges include SRA duties).
response	<i>Noted</i>
	Please refer to the response provided to comment #16.

comment	79	comment by: <i>CANSO</i>
	<p>ATCO.B.015 Rating endorsements</p> <p>(a) The Aerodrome Control Instrument (ADI) (ADC) rating shall may bear at least one of the following endorsements:</p> <p>(1) the Aerodrome Control Surveillance (SUR) endorsement, indicating that the licence holder is competent to provide aerodrome control with the help of surveillance systems.</p> <p>the Air Control (AIR) endorsement, indicating that the licence holder is competent to provide air control to traffic flying in the vicinity of an aerodrome and on the runway;</p> <p>the Ground Movement Control (GMC) endorsement, indicating that the licence holder is competent to provide ground movement control;</p> <p>the Tower Control (TWR) endorsement, indicating that the licence holder is competent to provide aerodrome control service. The TWR endorsement includes the privileges of the AIR and GMC endorsements;</p> <p>the Ground Movement Surveillance (GMS) endorsement, granted in addition to the Ground Movement Control endorsement or Tower Control endorsement, indicating that the licence holder is competent to provide ground movement control with the help of aerodrome surface movement guidance systems;</p> <p>the Aerodrome Radar Control (RAD) endorsement, granted in addition to the Air Control endorsement or Tower Control endorsement, indicating that the licence holder is competent to provide aerodrome control with the help of surveillance radar equipment.</p> <p>The Approach Control Surveillance (APS) rating may bear one or more of the following endorsements:</p> <p>the Precision Approach Radar (PAR) endorsement, indicating that the licence holder is competent to provide ground-controlled precision approaches with the use of precision approach radar equipment to aircraft on the final approach to the runway;</p> <p>the Surveillance Radar Approach (SRA) endorsement, indicating that the licence holder is competent to provide ground-controlled non-precision approaches with the use of surveillance equipment to aircraft on the final approach to the runway;</p> <p>the Terminal Control (TCL) endorsement, indicating that the licence holder is competent to provide air traffic control services with the use of any surveillance equipment to aircraft operating in a specified terminal area and/or adjacent sectors.</p>	

response	<p>The Area Control Procedural (ACP) rating may bear the Oceanic Control (OCN) endorsement, indicating that the holder of the licence is competent to provide air traffic control services to aircraft operating in an Oceanic Control Area.</p> <p>The Area Control Surveillance (ACS) rating may bear one of the following endorsements:</p> <p>the Terminal Control (TCL) endorsement, indicating that the licence holder is competent to provide air traffic control services with the use of any surveillance equipment to aircraft operating in a specified terminal area and/or adjacent sectors;</p> <p>the Oceanic Control (OCN) endorsement, indicating that the licence holder is competent to provide air traffic control services to aircraft operating in an Oceanic Control Area.</p> <p>AMC1 ATCO.B.015(a) Air traffic controller rating endorsements</p> <p>AERODROME CONTROL SURVEILLANCE ENDORSEMENT PRIVILEGES</p> <p>The Aerodrome Control Surveillance (SUR) endorsement indicates that the holder has the skills to use ATS surveillance systems in the aerodrome control service for the functions described in Annex IV to Commission Regulation (EU) 2017/373 (ATM/ANS)13, ATS.TR.155(a) and ATS.TR.245.</p> <p>GM1 ATCO.B.015(a)(3) Air traffic controller rating endorsements</p> <p>TOWER CONTROL ENDORSEMENT PRIVILEGES</p> <p>Where aerodrome control is provided from one operational position, this shall be indicated in the ATC licence by the issue of a Tower Control (TWR) endorsement to the Aerodrome Control Instrument rating. Aerodrome control may either be one operational position or be divided between two operational positions, Ground Movement Control (GMC) and Air Control (AIR). Consequently, the TWR endorsement entitles the holder of that rating endorsement to either provide aerodrome control from one working position or to provide AIR or GMC separately.</p> <p><i>Noted</i></p> <p>There is no comment inserted, as such no reaction needed.</p>
----------	---

comment	<p>80 comment by: CANSO</p> <p>ATCO.B.015</p> <p>Rationale – ATCO.B.015 and AMC and GM to ATCO.B.015</p> <p>The reference to ICAO with light adaptations for training and maintaining competence for the SRA endorsement is superfluous. The SRA endorsement does no longer exist and becomes a procedure which is dependent on the unit specifications.</p> <p>Like other procedures specific for a certain unit, the training and maintaining competency requirements should be defined by the respective TO and those responsible for the UCS and no longer a European obligation. Just like all other</p>
---------	--



response

<p>procedures which don't receive any special treatment in EU Law, such as TCL, simultaneous dependent and independent approaches etc...</p> <p>The regulation should not contain any detailed training and maintaining competency requirements on SRA.</p> <p>It should be an obligation to describe such things in the ANSP's unit competence scheme and unit endorsement courses.</p>
<p><i>Not accepted</i></p>
<p>Training requirements for SRA are defined by ICAO whereas nothing similar exists for TCL, parallel approaches, etc. EASA is not aware of any Member State that would have filed a difference to the ICAO requirements on SRA training. Despite some findings raised in this area during the standardisation visits, the assumption has thus been that the Member States comply with the requirement. The findings raised and the proposals received from some stakeholders have shown that there are difficulties to perform the required amount of SRAs with life traffic, which is why EASA proposes that part of these approaches could be performed using a simulator. A similar proposal has been made to ICAO.</p>

comment

135

comment by: *skeyes*

Rationale – ATCO.B.015 and AMC and GM to ATCO.B.015

The reference to ICAO with light adaptations for training and maintaining competence for the SRA endorsement is superfluous. The SRA endorsement does no longer exist and becomes a procedure which is dependent on the unit specifications.

Like other procedures specific for a certain unit, the training and maintaining competency requirements should be defined by the respective TO and those responsible for the UCS and no longer a European obligation. Just like all other procedures which don't receive any special treatment in EU Law, such as TCL, simultaneous dependent and independent approaches etc...

Suggestion:

The regulation should not contain any detailed training and maintaining competency requirements on SRA.

It should be an obligation to describe such things in the ANSP's unit competence scheme and unit endorsement courses.

response

<p><i>Not accepted</i></p>
<p>Please refer to the response provided to comment #80.</p>



comment

183

comment by: UK CAA

Paragraph No: ATCO.B.015 Rating endorsements, paragraph (b) (2)**Comment:**

The amendment deletes the SRA rating endorsement. We believe the SRA rating endorsement should be retained.

Justification:

The NPA proposes the removal of SRA endorsement but the following 'Rationale – ATCO.B.015 and AMC & GM to ATCO.B.015 states 'that:

The SRA rating endorsement is proposed to be removed. However, there will be an AMC referring to ICAO Annex 1 provisions and setting training requirements for cases where the APS rating privileges include SRA duties.

It is therefore unclear what the status of an SRA qualification is. If it is intended that SRA is to be a unit endorsement, then we believe the rating endorsement should be retained as there cannot be a unit endorsement for a rating or rating endorsement that does not exist.

If it is intended that the SRA requires specific additional training as part of the APS rating training, then in effect it is a rating endorsement.

ATCO.D.050 Prerequisites of unit training states that '*unit training can only be started by persons who have successfully completed initial training relevant to the rating and, if applicable, rating' endorsement.*

Proposed Text: Retain current text:

the Surveillance Radar Approach (SRA) endorsement, indicating that the licence holder is competent to provide ground-controlled non-precision approaches with the use of surveillance equipment to aircraft on the final approach to the runway.

response

Accepted

SRA rating endorsements will be retained.

comment

184

comment by: UK CAA

Paragraph No: ATCO.B.015 Rating endorsements, paragraph (b) (3) and (d) (1)**Comment:**

The amendment deletes the TCL rating endorsement. We believe the TCL rating endorsement should be retained.



Justification:
 The NPA proposes the removal of TCL endorsement but the following ‘Rationale – ATCO.B.015 and AMC & GM to ATCO.B.015 states ‘that:

The TCL rating endorsement, attached to either the APS or the ACS rating, is proposed to be removed. In accordance with the standardisation feedback, the use of this rating endorsement is unit-specific, and it does not therefore make sense to have it as a mutually recognised rating endorsement. If there is a need to specifically indicate the TCL privileges, this can be done by inclusion of the TCL in the unit endorsement (see GM1 ATCO.B.020(a)).

This recognises the fact that the TCL rating endorsement is still to be used at some units and should be included as a unit endorsement at those units. It not possible to have a unit endorsement for a rating or rating endorsement that does not exist.

ATCO.D.050 Prerequisites of unit training states that ‘unit training can only be started by persons who have successfully completed initial training relevant to the rating and, if applicable, rating’ endorsement.

Proposed Text: Retain current text:
 the Terminal Control (TCL) endorsement, indicating that the licence holder is competent to provide air traffic control services with the use of any surveillance equipment to aircraft operating in a specified terminal area and/or adjacent sectors

response *Not accepted*

A terminal control function can continue to be performed. When the function is related to a specific sector or working position, TCL could be inserted as unit endorsement, not rating endorsement. To avoid confusion, the GM that was referred to in the NPA explanatory note has been deleted.

comment 271 comment by: GATE Aviation Training

· ATCO.B.015 (d):
 Different font of letters

response *Accepted*

comment 302 comment by: FOCA Switzerland

NPA (a, b, c, d, e, f, g)	Reference (Chapter and page)	Text NPA	Proposal FOCA	Justification



2021-08 a	ATCO.B.015 (a) Vs. Appendix 1 to Annex II field IX and abbreviations	Incorporation of rating endorsements TWR, GMC and AIR in rating ADC Vs. <i>Ratings and rating endorsements that are not in use anymore but have been issued before dd.mm.yyyy (date of application) will be marked with an * and maintained for tracking purposes.</i>	FOCA suggests to: - either mark previous competences with an * and keep the abbreviations of previous competences in the regulation; - OR delete all references to the previous competences (i.e. * and abbreviation), considering the fact that NSA has complete history in their licensing tool for all ATCo.	Generally FOCA supports the NPA with the reduction of ratings and rating endorsements resp. their inclusion in other ratings / rating endorsements. However, to keep TWR, GMC, AIR, GMS, RAD, SRA and TCL in the appendix 1 to annex II field IX with an *, as well as in the abbreviation list, creates an incoherence in the regulation, an administrative burden and consequently also a licence that depicts more than the current competencies of the ATCO.
2021-08 a	ATCO.B.015 (a) Vs. Appendix 1 to Annex II field IX and abbreviations	Incorporation of rating endorsements GMS and RAD in new rating endorsement SUR Vs. <i>Ratings and rating endorsements that are not in use anymore but have been issued before dd.mm.yyyy (date of application) will be marked with an * and maintained for tracking purposes.</i>	Additionally, with regards SRA and TCL becoming integral part of APS, it is unclear whether these subjects should be additionally trained in the rating training, considering that today specific courses have been defined during unit training leading to these rating endorsements.	
2021-08 a	ATCO.B.015 (b) Vs. Appendix 1 to Annex II field	Incorporation of rating endorsements SRA and TCL in rating APS Vs		



	IX and abbreviations	<p><i>Ratings and rating endorsements that are not in use anymore but have been issued before dd.mm.yyyy (date of application) will be marked with an * and maintained for tracking purposes.</i></p>		
response	<p><i>Partially accepted</i></p> <p>The references to previous competencies will be removed. Please see the response provided to comment #76.</p> <p>As for SRA, the proposal to remove the rating endorsement has been withdrawn. Training for SRA may be provided as part of either initial or unit training as before. A new AMC will clarify that training for the possible provision of terminal control should be part of the unit training.</p>			

AMC1 ATCO.B.015(a) Air traffic controller rating endorsements	p. 37
--	-------

comment

135 ❖

comment by: *skeyes*

Rationale – ATCO.B.015 and AMC and GM to ATCO.B.015

The reference to ICAO with light adaptations for training and maintaining competence for the SRA endorsement is superfluous. The SRA endorsement does no longer exist and becomes a procedure which is dependent on the unit specifications.

Like other procedures specific for a certain unit, the training and maintaining competency requirements should be defined by the respective TO and those responsible for the UCS and no longer a European obligation. Just like all other procedures which don't receive any special treatment in EU Law, such as TCL, simultaneous dependent and independent approaches etc...

Suggestion:



	<p>The regulation should not contain any detailed training and maintaining competency requirements on SRA.</p> <p>It should be an obligation to describe such things in the ANSP’s unit competence scheme and unit endorsement courses.</p>
response	<p>Not accepted</p> <p>Please refer to the response provided to comment #80.</p>

comment	<p>209 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p>
	<p>GM1 ATCO.B.010(a)(2);(3) Air traffic controller ratings, Page 37</p> <p>Sweden supports the clarification that an APP or ACP rating is not required to deal with contingency and fallback operation, but we see a need for more clarification as to what constitutes an acceptable fallback or contingency scenario. Can for example a planned maintenance closure of a radar be included? If so for how long? Is it acceptable that an APS only rated ATCO work without a radar for a planned closure of an hour? Of a day? Of a week?</p> <p>Leaving the scope of “fallback” and “contingency” open for interpretation opens a risk that different member states and ANSPs have very different interpretations of the requirement, which can lead to detrimental differences in flight safety between different member states, as well as impede free movement (because some states will still require APP/ACP and some will not).</p> <p>This interpretation should be made using an AMC to ensure interpretation is consistent between member states.</p>
response	<p><i>Partially accepted</i></p> <hr/> <p>GM1 ATCO.B.010(a)(2);(3) has been updated to further clarify.</p>

comment	<p>210 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p>
	<p>GM1 ATCO.B.010(a)(4);(5) Air traffic controller ratings, Page 37</p> <p>Sweden supports the clarification that an APP or ACP rating is not required to deal with contingency and fallback operation, but we see a need for more clarification as to what constitutes an acceptable fallback or contingency scenario. Can for example a planned maintenance closure of a radar be included? If so for how long? Is it acceptable that an APS only rated ATCO work without a radar for a planned closure of an hour? Of a day? Of a week?</p>



	<p>Leaving the scope of “fallback” and “contingency” open for interpretation opens a risk that different member states and ANSPs have very different interpretations of the requirement, which can lead to detrimental differences in flight safety between different member states, as well as impede free movement (because some states will still require APP/ACP and some will not).</p> <p>This interpretation should be made using an AMC to ensure interpretation is consistent between member states.</p>
response	<p><i>Partially accepted</i></p>
	<p>GM1 ATCO.B.010(a)(4);(5) has been updated to further clarify.</p>

<p>ATCO.B.020 Unit endorsements</p>	<p>p. 38</p>
--	--------------

comment	<p>5 comment by: <i>cbarbas</i></p>
	<p>ATCO.B.020(a) Unit endorsements</p> <p>Given the timeframe of the present NPA, it could be useful to include some clarifications on the unit endorsement privileges when providing remote services in multiple mode of operation. Thus, the unit endorsement for the provision of multiple operation mode services to a group of airports would include all the less complex derived scenarios: multiple mode of operation for any combination of the grouped airports, and single operation mode for each of those airports.</p> <p>In this way, the process of the implementations of the multiple mode of operations, expected in the near future, can be eased, avoiding duplications of items included in the unit, conversion and refresher training courses. Furthermore, it would ensure flexibility in the staffing and rostering of air traffic controllers in remote tower services, in line with the objectives of the present NPA. All this without reducing neither training nor competence requirements.</p> <p>If not done, current "AMC1 ATCO.B.020(a) Unit endorsements" can be understood to require a different unit endorsement for each of the aerodromes where multiple mode of operations is provided. And, besides the administrative burden due to the management of the duplicated unit endorsements, according to “GM4 ATCO.D.060(c) Unit endorsement course” and “GM1 ATCO.D.085 Conversion training”, a number of common items could be required in the different courses for each unit endorsement: communication procedures, human factors, standard procedures, etc.</p> <p>Thus, current "AMC1 ATCO.B.020(a) Unit endorsements" could be amended to clarify the multiple mode of operation as follows:</p> <p>"When aerodrome control service is provided from a ‘remote tower’ (defined in EASA ‘Guidance Material on remote aerodrome air traffic services’ — Issue 21), each</p>



aerodrome for which the service is provided in single mode of operation should constitute its own unit endorsement.

When remote services in multiple mode of operation is provided, the aggrupation of all the different aerodromes attended simultaneously from one remote tower module (RTM) (defined in the EASA 'Guidance Material on remote aerodrome air traffic services' — Issue 2) should constitute its own unit endorsement.

A unit endorsement for the remote service provision in multiple mode of operation for a group of aerodromes should also authorise the license holder to provide air traffic control services in single or multiple mode of operation for any combination of the aerodromes included in that unit endorsement.

Example: a unit endorsement for the remote service provision in multiple mode of operation for aerodromes A + B + C should also authorise the license holder to provide air traffic control services in multiple mode of operation for any combination of the three aerodromes: A+B, A+C or B+C.

Likewise, this same unit endorsement (A + B + C) should also authorise the license holder to provide air traffic control services in single mode of operation for each of the three aerodromes: A, B and C

Example: Given three aerodromes (X, Y and Z), when providing remote services in multiple mode of operation for aerodromes X + Y, and X + Z, two different unit endorsements should be required, unless a common unit endorsement to provide remote services in multiple mode of operation for aerodromes X + Y + Z is hold."

response *Noted*

The establishment of unit endorsements for remote aerodrome ATS will be addressed under upcoming NPAs for rulemaking tasks RMT.0624 (remote aerodrome ATS) and RMT.0668 (ATCO).

comment 39 comment by: *Civil Aviation Authority the Netherlands*

Page 39

GM1 ATCO.B.020(c)

GM is not clear. See the comments on ATCO.B.020(c)

New proposal:

ISSUE OF A UNIT ENDORSEMENT TO A HOLDER OF A TEMPORARY OJTI AUTHORISATION

It is recognised that completion of a unit endorsement course in accordance with the requirements set out in Part ATCO, Subpart D, Section 3 as regards the on-the-job training phase may not be possible in cases of establishment of a new ATC unit or sector, new rating or rating endorsement put into operation at an ATC unit or reopening of a temporary ATC unit.

response *Not accepted*

The issue of the temporary OJTI authorisation and of the unit endorsement could happen simultaneously.

Please also refer to the answer in comment #40.

comment **40** comment by: *Civil Aviation Authority the Netherlands*

Page 38

ATCO.B.020(c)

Proposal is not clear. Completion of the unit endorsement course at a new unit (by means of an alternative way of OJT, like fully at simulator) is possible for applicants/trainees due to the fact that an OJTI has a temporary permission. This is what in the Netherlands LVNL had to deal with with during the ATCO training at Lelystad.

The issue of a unit endorsement to an OJTI with a temporary OJTI permission is a problem as explained in the rationale. In our opinion the latter should be clearly regulated. The experience as ATCO/OJTI at another unit supplemented with the preparatory work (like simulator training in the new procedures etc. (ATCO.C.010(b)(3)) to provide OJT at the new unit should be sufficient to issue the unit endorsement to this OJTI.

The rationale explains exactly this issue, but it is not clearly written in the rule and GM.

Make the rule more clear. Is the rule only related to the issue of a unit endorsement for OJTIs with a temporary permission?

New proposal:
Notwithstanding 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 **to an applicant holding a temporary OJTI authorisation for that unit.**

response *Partially accepted*

Text is proposed to be clarified to require that the temporary OJTI authorisation in question must be for the same unit.

Please also refer to the answer in comment #39.

comment **53** comment by: *CANSO*



	<p>ATCO.C.020 (e) wording, since only one requirement is left: "if the requirements of ATCO.C.015(a) are is not met...."</p> <p>"if the requirements of ATCO.C.015(a) are <u>is</u> not met...."</p>
response	<p><i>Accepted</i></p>
	<p>Text will be changed.</p>

comment	<p>57 comment by: <i>CANSO</i></p> <p>ATCO.B.020(c) Proposal is not clear. Completion of the unit endorsement course at a new unit (by means of an alternative way of OJT, like fully at simulator) is possible for applicants/trainees due to the fact that an OJTI has a temporary permission. This is what LVNL had to face with during the ATCO training at Lelystad.</p> <p>The issue of an unit endorsement to an OJTI with a temporary OJTI permission is a problem as explained in the rationale. In our opinion the latter should be clearly regulated. The experience as ATCO/OJTI at another unit supplemented with the preparatory work (like simulator training in the new procedures etc. (ATCO.C.010(b)(3)) to provide OJT at the new unit should be sufficient to issue the unit endorsement to this OJTI.</p> <p>The rational explains exactly this issue, but it is not clearly written in the rule and GM.</p> <p>Suggested Resolution Make the rule more clear. Is the rule only related to the issue of an unit endorsement for OJTIs with a temporary permission?</p> <p>New proposal: Notwithstanding 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 to an applicant holding a temporary OJTI authorisation for that unit.</p>
response	<p><i>Partially accepted</i></p> <p>Please refer to the response provided to comment #40.</p>

comment	<p>167 comment by: <i>AESA/DSANA</i></p> <p>ATCO.B.20 Unit endorsements</p> <p>COMMENT</p>
---------	---



response	<p>There are still references in the NPA to the requirement of exchange the licence when this concept has been replaced by Change of Competent Authority.</p> <p>JUSTIFICATION If exchange of licence is removed and changed by Change of Competent Authority, then all references to exchange of licence should be replaced by Change of Competent Authority in the NPA.</p> <p><i>Partially accepted</i></p> <p>The terminology will be aligned where suitable taking into consideration that exchange of licence is an action that follows the change of competent authority.</p>
comment	<p>207 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>ATCO.B.015 Rating endorsements, Page 38 When the RAD and GMS endorsements are joined it could lead to longer initial training. In Sweden only two airports have GMS but all airports have RAD. If this change means that every ATCO now has to do the equivalent of the GMS endorsement training times (and therefore costs) would increase.</p> <p>response <i>Noted</i></p> <p>The proposal to join former GMS and RAD rating endorsements has been withdrawn. New AMC is proposed to be introduced stating that the training for provision of ground movement control with the help of aerodrome surface movement guidance systems should be included in the unit endorsement course. There is no need to train the ATCOs for provision of ground movement control with the help of aerodrome surface movement guidance systems if they do not provide this service.</p>
comment	<p>242 comment by: <i>French DGAC</i></p> <p>P. 40 ATCO.B.020</p> <p>After renumbering the paragraphs in ATCO.B.020, further adjustments are necessary:</p> <ul style="list-style-type: none"> • ATCO.B.025(a)(1), "<i>the validity of the unit endorsement(s) in accordance with ATCO.B.020(e) ATCO.B.020(c) "</i>; • ATCO.B.025(a)(3), "<i>...shall not exceed 12 months, for the purpose of ATCO.B.020(g)(1) ATCO.B.020(i)(1)...</i>" • ATCO.AR.E.005 (b) : "<i>...the unit endorsement course established in accordance with ATCO.B.020(b) and (c) ATCO.B.020(b) and (e)...</i>"



response	<i>Accepted</i>	
	References will be changed.	
comment	243	comment by: <i>French DGAC</i>
	P 40 ATCO.B.020 (c)	
	We welcome the amendment that eliminates the requirement of an on-the-job training phase when the unit endorsement is issued in connection with the issue of a temporary OJTI authorisation.	
response	<i>Noted</i>	
comment	244	comment by: <i>French DGAC</i>
	P 40 ATCO.B.020 (d)	
	As mentioned above, in France unit endorsement are coded with 2-letter codes. Multiplying the limitations to be indicated on unit endorsement will be less and less readable and will imply development costs.	
response	<i>Noted</i>	
	It has been recognised in the explanatory note that some updates in the licensing software may be required.	

AMC1 ATCO.B.020(e g) Unit endorsements	p. 39
---	-------

comment	60	comment by: <i>CANSO</i>
	GM1 ATCO.B.020(c) GM is not clear. See the LVNL comments on ATCO.B.020(c)	
	New proposal:	
	ISSUE OF A UNIT ENDORSEMENT TO A HOLDER OF A TEMPORARY OJTI AUTHORISATION	
	It is recognised that completion of a unit endorsement course in accordance with the requirements set out in Part ATCO, Subpart D, Section 3 as regards the on-the-job training phase may not be possible in cases of establishment of a new ATC unit or sector, new rating or rating endorsement put into operation at an ATC unit or reopening of a temporary ATC unit.	



response *Not accepted*

Please refer to the response provided to comment #39.

AMC1 ATCO.B.020(d) Unit endorsements

p. 39

comment 245

comment by: *French DGAC*

P 41 AMC1 ATCO.B.020(d) Unit endorsements

As mentioned above, in France unit endorsement are coded with 2-letter codes. Multiplying the limitations to be indicated on unit endorsement will be less and less readable and will imply development costs.

response *Noted*

Please refer to the response provided to comment #244.

ATCO.B.025 Unit competence scheme

p. 41

comment 136

comment by: *skeyes*

The purpose of the adding a minimum number of approaches is unclear. So, an ATCO working in a tower, approach or terminal area environment must no longer be performing a number of hours but could be considered competent by guiding a number of approaches?

If it is required to mention special procedures towards maintaining competency of SRA

Delete under ATCO.B.025 (a) (3): "or the minimum number of approaches" and publish GM2 as an AMC.

No special treatment SRA

Suggestion to delete all references to SRA from the Regulation

E.g. ATCO.B.025 (a) (3): remove "or the minimum number of approaches" and remove its GM2

response *Partially accepted*



The minimum number of approaches relates only to PAR and SRA duties. ATCO.B.025(a)(3) has been updated to indicate clearly this option. This makes the GM superfluous.

As for SRA, the rating endorsement is retained, and the references are therefore needed.

comment 145 comment by: *CANSO*

ATCO B025
Please define « sector ». Are we talking about sectors define in NM ? About groups of sectors regarding the training plan and the unit training ?

response *Noted*

The purpose is to refer to ‘sectors’ as defined by the ATS unit. This is an existing term in the Regulation. The commentator is asked to provide further clarification on the experienced interpretation difficulties, if any.

comment 168 comment by: *AESA/DSANA*

ATCO.B.25 Unit Competence scheme

COMMENT
Bad reference in ATCO.B.025 (a) (3). Where it says: ATCO.B.020 (g)(1), it should say ATCO.B.020(i)(1), according to the change in ATCO.B.020

response *Accepted*

Reference will be updated.

comment 199 comment by: *DSNA/SDRH*

Please define « sector ». Are we talking about sectors define in NM ? About groups of sectors regarding the training plan and the unit training ?

response *Noted*

Please refer to the response provided to comment #145.



comment

81

comment by: *CANSO***ATCO.B.025 Unit competence scheme**

(a) ...

(3) the minimum number of hours or the minimum number of approaches for exercising the privileges of the unit endorsement within a defined period of time, which shall not exceed 12 months, for the purpose of ATCO.B.020(g)(1). For on-the-job training instructors exercising the privileges of the OJT endorsement, the time spent instructing shall be counted for the maximum of 50 % of the hours required for revalidation of the unit endorsement;

...

AMC1 ATCO.B.025(a)(3) Unit competence scheme**MINIMUM NUMBER OF HOURS**

The minimum number of hours should be defined in a manner which ensures that the privileges are exercised in all sectors and/or positions covered by the unit endorsement.

GM2 ATCO.B.025(a)(3) Unit competence scheme**MINIMUM NUMBER OF HOURS**

At the units where Surveillance Radar Approach (SRA) is used, the minimum number of hours for exercising the SRA privileges as part of the APS rating privileges may be substituted by a number of surveillance radar approaches.

The purpose of the adding a minimum number of approaches is unclear. So, an ATCO working in a tower, approach or terminal area environment must no longer be performing a number of hours but could be considered competent by guiding a number of approaches? see also remark under "5"

If it is required to mention special procedures towards maintaining competency of SRA

Delete under ATCO.B.025 (a) (3): "or the minimum number of approaches" and publish GM2 as an AMC.

Suggestion:

No special treatment SRA

Delete all references to SRA from the Regulation

E.g. ATCO.B.025 (a) (3): remove "or the minimum number of approaches" and remove its GM2

response

Partially accepted

Please refer to the response provided to comment #136.

comment

124

comment by: *German NSA (BAF)*

response	<p>Comment on GM2 ATCO.B.025(a)(3) Unit competence scheme (page 44):</p> <p>The written text should be adapted. It must be clear that "approaches" refers to SRA and PAR, otherwise it would be legally acceptable to define a unit endorsement in APS based on a number of approaches.</p> <p><i>Partially accepted</i></p> <p>Please refer to the response provided to comment #136.</p>
comment	<p>136 ❖ comment by: <i>skeyes</i></p> <p>The purpose of the adding a minimum number of approaches is unclear. So, an ATCO working in a tower, approach or terminal area environment must no longer be performing a number of hours but could be considered competent by guiding a number of approaches?</p> <p>If it is required to mention special procedures towards maintaining competency of SRA</p> <p>Delete under ATCO.B.025 (a) (3): "or the minimum number of approaches" and publish GM2 as an AMC.</p> <p>No special treatment SRA Suggestion to delete all references to SRA from the Regulation E.g. ATCO.B.025 (a) (3): remove "or the minimum number of approaches" and remove its GM2</p>
response	<p><i>Partially accepted</i></p> <p>The minimum number of approaches relates only to PAR and SRA duties. ATCO.B.025(a)(3) has been updated to indicate clearly this option. This makes the GM superfluous.</p> <p>As for SRA, the rating endorsement is retained, and the references are therefore needed.</p>
comment	<p>217 comment by: <i>Fintraffic Air Navigation Services</i></p> <p>Proposed new text: MINIMUM NUMBER OF HOURS The minimum number of hours should be defined in a manner which ensures that the privileges are exercised in all sectors and/or positions covered by the unit endorsement, unless all the sectors and/or positions reach a high level of harmonization. If minimum number of hours is not defined for all sectors and/or positions, a safety assessment should be made by the ANSP</p>

	<p>Rationale:</p> <p>The AMC should allow the ANSP the right to consider their particular circumstances when defining how much in detail the minimum number of hours is defined. In units where tasks, equipment and environments across all sectors/sector combinations and/or positions have been harmonized to high level, defining minimum number of hours will bring no added value with regard to safety. On the contrary, it will lead to a less dynamic use of staff and thus airspace in all units, where there are more sectors and/or positions. This is contrary to the long term objective of increasing ATCO mobility and efficiency of airspace use.</p>
response	<i>Partially accepted</i>
	AMC1 ATCO.B.025(a)(3) will be removed. Instead, current GM1 ATCO.B.025(a)(3) will be elevated to AMC and amended.

AMC4 ATCO.B.040 Assessment of language proficiency

p. 43

comment	250	comment by: <i>French DGAC</i>
	<p>P. 45 ATCO.B.040 Assessment of language proficiency</p> <p>This amendment raises the difficulty of identifying whether an ATCO Language certificate issued in a different Member State is legit, in the absence of a common European list of approved language assessment bodies.</p> <p>Since EASA is circulating a draft “Best intervention strategy – Language proficiency Assessment and Oversight”, we wish this amendment were adjourned until after the outcome of the linguistic works.</p>	
response	<i>Not accepted</i>	
	<p>The competent authority receiving the application for a language endorsement will in any case have to exchange information with the competent authority that approved the assessment method to ensure that a language certificate issued in another Member State is valid. Alignment between air crew and air traffic controller requirements.</p>	

comment	273	comment by: <i>GATE Aviation Training</i>
	<ul style="list-style-type: none"> · <u>ATCO.B.040:</u> (3) the appeals procedure 	

response	<i>Accepted</i>
	's' deleted.

ATCO.B.040 Assessment of language proficiency	p. 43
--	-------

comment	254	comment by: <i>BCAA</i>
	<p>The proposed amendment of ATCO.B.040 states that the demonstration of language proficiency shall be done through a method of assessment approved by ANY competent authority ...</p> <p>The fact that the approval of any EU competent authority is sufficient, gives the local competent authority less leverage, therefore it will have to accept a certificate even if the LAB might be considered questionable. A big difference in quality or level of LABs exists and this opens the door for ATCOs to go to the LAB which has the easiest assessment. More specific requirements for LABs, ELP assessments and LAB oversight would be useful before allowing the approval of ANY competent authority.</p>	
response	<i>Noted</i>	
	<p>This amendment is to align with the air crew domain and to reduce the administrative burden of competent authorities. Concerns about the acceptability of the approval of the assessment method by another competent authority will be channelled into the follow-up of the Best Intervention Strategy (BIS) on 'Language Proficiency Assessment and Oversight'.</p>	

ATCO.C.015 Application for on-the-job training instructor endorsement	p. 44
--	-------

comment	34	comment by: <i>ENAIRE</i>
	<p>Rationale — ATCO.C.015 and ATCO.C.020 We agree. Welcome this modification.</p>	
response	<i>Noted</i>	

SUBPART C - REQUIREMENTS FOR INSTRUCTORS AND ASSESSORS	p. 44
---	-------



comment

299

comment by: BCAA

Regarding ATCO.C.010 (b)(2)

"Holders of an OJTI endorsement shall only exercise the privileges of the endorsement if they have exercised for an immediately preceding period of at least six months the privilege of the valid unit endorsement, in which instruction will be given;"

The way the requirement is written, it can be interpreted that having performed ATC under the unit endorsement only once, e.g. 5 months before acting as OJTI, is sufficient to comply to this requirement. Whereas the more common understanding might be to have the ATCO performing ATC during the whole period of the preceding 6 months, should comply to the minimum operational hours within this period.

response

Noted

The OJTI/ STDI requirements review is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340. However, ATCO.C.010(b)(2) is just a part of the set of conditions to be fulfilled by the OJTI in order to exercise the privileges of OJTI.

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

p. 45

comment

8

comment by: Croatian Civil Aviation Agency

It is not clear what is meant by point (e) when requesting to comply with the ATCO.C.040(b) and (c).

I propose to change the point (e) as follows:

(e) If the requirements of ATCO.C.015(a) and (b) are not met, the OJTI endorsement may be exchanged for an STDI endorsement, with the date of validity of OJTI endorsement.

Rationale:

There cannot be applicable both ATCO.C.040(b) and (c), because the only one procedure shall be followed, either the revalidation or renewal.

There is no connection with the renewal or revalidation of STDI endorsement during the exchange procedure. The validity date of OJTI then becomes the validity date of STDI.

When the time comes, the renewal or revalidation of STDI shall be done in accordance with ATCO.C.040 (b) or (c).

For example:



	<p>Today I exchange the OJTI into STDI. The validity of OJTI is 12.02.2023. The exchanged STDI will be then valid until 12.02.2023. Why should I need to comply with the renewal AND revalidation requirements at this moment, and why both? Maybe the refresher training is planned in 2022 year, and is completely correct, because the refresher training shall be completed during the validity of STDI (or OJTI)endorsement.</p>
response	<p><i>Noted</i></p>
	<p>The OJTI/ STDI requirements review is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.</p>

comment	<p>17 comment by: <i>DFS Deutsche Flugsicherung GmbH</i></p>
	<p>ATCO.C.020 (e) wording, since only one requirement is left: "if the requirements of ATCO.C.015(a) are <u>is</u> not met...."</p>
response	<p><i>Accepted</i></p>
	<p>Wording changed.</p>

ATCO.C.030 Synthetic training device instructor (STDI) privileges	p. 45
--	-------

comment	<p>18 comment by: <i>DFS Deutsche Flugsicherung GmbH</i></p>
	<p>GM1 ATCO.C.030(c)(3) wording: there is only one aerodrome control rating now "Some of the skills required for the two different aerodrome control ratings,...."</p>
response	<p><i>Accepted</i></p>
	<p>Wording changed.</p>

comment	<p>54 comment by: <i>CANSO</i></p>
	<p>GM1 ATCO.C.030(c)(3)</p>



	wording: there is only one aerodrome control rating now
	"Some of the skills required for the two different aerodrome control ratings ⁵⁷ ,....."
response	<i>Accepted</i>
	Please refer to the response provided to comment #18.

ATCO.C.040 Validity of synthetic training device instructor endorsement	p. 47
--	-------

comment	280	comment by: <i>GATE Aviation Training</i>
	<p>The STDI endorsement may be revalidated by successfully completing refresher training on practical instructional skills and on current operational practices during its validity period.</p> <p>GATE Aviation Training suggests that STDIs and Assessors that work only in STD environment should not be trained on current operational practices but on current ATC regulations. Operational practices might differ from ANSP to ANSP and also unit to unit anyhow.</p> <p>Definition of current operational practices should be added.</p>	
response	<i>Noted</i>	
	<p>The validity of the OJTI/ STDI endorsements are currently under discussion and the comment will be considered at the next amendment cycle of Regulation (EU) 2015/340.</p>	

ATCO.C.060 Validity of assessor endorsement	p. 49
--	-------

comment	281	comment by: <i>GATE Aviation Training</i>
	<p><u>GM1 ATCO.C.060 (a) Validity of assessor endorsement</u></p> <p>1. Dedicated or continuous assessment of assessment skills or operational practices? In case the assessor has been assessed as ATCO in the ATCO refresher training can this be considered as verification of current operational practices also for revalidation of the assessor endorsement? Can this assessment happen any time during the 3 years of the validity of the assessor endorsement?</p> <p>2. What does peer assessment mean? There is no definition.</p> <p>3. Definition of demonstration?</p>	



response

Noted

The assessor validity is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.

comment

282

comment by: *GATE Aviation Training*GM1 ATCO.C.060 (b) Validity of assessor endorsement

Current operational practices may be refreshed by transitional and pre-on-the-job training.

Does this mean to take part in the entire TT or Pre-OJT training? Would the ATCO refresher training be also sufficient? This should apply for assessors assessing TT and Pre-OJT training, not for assessors assessing initial training only.

response

Noted

The assessor validity is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.

ATCO.D.010 Composition of initial training

p. 50

comment

174

comment by: *AESA/DSANA*

ATCO.D.010 Composition of initial training

COMMENT

It would be helpful to establish a maximum number of hours per day in training, both theoretical and practical.

JUSTIFICATION

Training design should take into account that students may be tiring if they are too many hours in class.

response

Not accepted

Establishing the maximum number of hours per day in training would create a too rigid environment at European level and is not in line with the aim of the regulatory framework.



ATCO.D.040 Rating training performance objectives

p. 52

comment	169	comment by: AESA/DSANA
	ATCO.D.040 Rating training performance objectives	
	COMMENT Mistake: c) In addition to point (b), rating training performance objectives for the Aerodrome Aerodrome Control (ADC) rating shall ensure that applicants:	
response	<i>Accepted</i>	
	Text amended.	

AMC1 ATCO.D.045(c)(4) Composition of unit training

p. 53

comment	175	comment by: AESA/DSANA
	ATCO.D.045 Composition of unit training	
	COMMENT It would be helpful to establish a maximum number of hours per day in training, both theoretical and practical.	
	JUSTIFICATION Training design should take into account that students may be tiring if they are too many hours in class.	
response	<i>Not accepted</i>	
	Please refer to the response provided to comment #174.	

AMC1 ATCO.D.055(b)(6) Unit training plan

p. 54

comment	38	comment by: Civil Aviation Authority the Netherlands
	Page 56	
	AMC1 ATCO.D.055(b)(6) Unit training plan.	

	<p>This AMC should not only be applicable for SRA. Due to COVID it was proven that simulators are a worthwhile tool to substitute parts of the OJT period. Therefore simulators which do comply with the requirements of AMC1 ATCO.OR.C.015(b) under (c) should be allowed to partly substitute the minimum OJT time as well. GM1 ATCO.D.005(a)(2)(ii) under (b) should be adapted accordingly.</p> <p>New proposal: (b) Notwithstanding point (a), the minimum duration of the on-the-job training instruction for the surveillance radar approach duties may be partly substituted by utilising a simulator compliant to AMC1 ATCO.OR.C.015(b) under (c), if approved by the competent authority.</p>
response	<p><i>Noted</i></p>
	<p>The use of synthetic training devices is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.</p>
	<p>61 comment by: <i>CANSO</i></p> <p>AMC1 ATCO.D.050(b)(6)</p> <p>This AMC should not only be applicable for SRA. Due to COVID it has proven that simulators are a worthwhile tool to substitute parts of the OJT period. Therefore simulators which do comply with the requirements of AMC1 ATCO.OR.C.015(b) under (c) should be allowed to partly substitute the minimum OJT time as well. GM1 ATCO.D.005(a)(2)(ii) under (b) should be adapted accordingly.</p> <p>New proposal: (b) Notwithstanding point (a), the minimum duration of the on-the-job training instruction for the surveillance radar approach duties may be partly substituted by utilising a simulator compliant to AMC1 ATCO.OR.C.015(b) under (c), if approved by the competent authority.</p>
response	<p><i>Noted</i></p>
	<p>Please refer to the response provided to comment #38.</p>
comment	<p>125 comment by: <i>German NSA (BAF)</i></p> <p>Comment on AMC1 ATCO.D.055(b)(6) Unit training plan (page 56):</p> <p>The word "simulator" cannot be used as only STDs are defined in the regulatory text. I.e. reference to STDs according to ATCO.OR.C.015 (b) should be made here. If deemed necessary (at this stage) AMC material could be created that refers to</p>

	"Simulator" (vs. PTT) as defined in AMC1 ATCO.OR.C.015 or the AMC material under ATCO.OR.C.015 should be updated accordingly. Possible aspects that could be explained further: What conditions need to be met for using the Simulator? What kind of Simulator needs to be used? Is there a timely restriction for using the simulator (maximum Hours)?
response	<i>Not accepted</i>
	'Simulator' is defined in Article 4(25). The use of synthetic training devices is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.

comment	170 comment by: AESA/DSANA
	AMC1 ATCO.D.055(b)(6) Unit training plan COMMENT (b) Only in this case can the simulator be used instead of on-the-job training instruction? And in the other ratings? According to GM1 ATCO.D.005(a)(2)(ii)-(b), we are using in specific cases hours in simulator counting towards the minimum duration of OJT. JUSTIFICATION AMC1 ATCO.D.055(b)(6) Notwithstanding point (a), the minimum duration of the on-the-job training instruction for the surveillance radar approach duties may be partly substituted by utilising a simulator, if approved by the competent authority. GM1 ATCO.D.005(a)(2)(ii) ON THE JOB TRAINING (b) Hours accumulated using these training tools and methods during this phase cannot be counted towards the minimum duration of on-the-job training established in accordance with AMC1 ATCO.D.055(b)(6), with the exception of training for procedures unlikely to be encountered in the operational environment during the training.
response	<i>Noted</i>
	The use of synthetic training devices is a task that is currently under discussion and will be dealt with at the next amendment cycle of Regulation (EU) 2015/340.

APPENDIX 2 OF TO ANNEX I - BASIC TRAINING

p. 55

comment	37 comment by: Civil Aviation Authority the Netherlands
---------	--

response	<p>On Page 57, in the new text:</p> <p>What is meant by 'rating in another category'? ADC and APP are different categories. Is it confirmed that when a qualified tower controller (ADC unit endorsement) is undergoing APP unit training, the OJT duration for APP (or other category) may be reduced? For example, Netherlands' provider LVNL has a very limited procedural approach control operation (low traffic volumes) and it has proven that qualified tower controllers do not need 180 hours or 3 months (whichever is greater) of OJT to be able to provide procedural approach control in a safe and efficient way.</p> <p>Please clarify 'another category'.</p> <p><i>Partially accepted</i></p> <p>'Rating in another category' removed from the text.</p>
comment	<p>62 comment by: <i>CANSO</i></p> <p>GM1 ATCO.D.055(b)(7)</p> <p>What is meant by 'rating in another category'? ADC and APP are different categories. Is it confirmed that when a qualified tower controller (ADC unit endorsement) is undergoing APP unit training, the OJT duration for APP (or other category) may be reduced? LVNL has a very limited procedural approach control operation (low traffic volumes) and it has proven that qualified tower controllers do not need 180 hours or 3 months (whichever is greater) of OJT to be able to provide procedural approach control in a safe and efficient way.</p> <p>Clarify 'another category'</p>
response	<p><i>Partially accepted</i></p> <p>Please refer to the response provided for comment #37.</p>
comment	<p>211 comment by: <i>Swedish Transport Agency, Civil Aviation Department (Transportstyrelsen, Luftfartsavdelningen)</i></p> <p>AMC1 ATCO.D.055(b)(6) Unit training plan, Page 56</p> <p>Sweden supports the option of using simulators in the SRA training.</p>
response	<p><i>Noted</i></p>

comment

137

comment by: *skeyes*

Until now the Belgian CAA is the competent authority for the licenses, rating and endorsements and they are not the CA for medical certificates.

The required competences for the assessment of issuing, suspending or the revocation of a license or a medical certificate are of different classification. They have both a completely different role and responsibility.

The medical certificate should be done by a competent authority wherein only AME participate. This to guarantee the correct expertise is in place.

Suggestion:

Describe the medical CA (AMS) for issuing, suspending and revocation of the medical certificate in the part MED

The responsibilities of the tasks of the CA should be listed based on the defined CAs in article 6 (1) and (3) of the Cover Regulation.

response

Noted

Article 5 of the of Regulation (EU) 2015/340 states that Member States shall nominate or establish one or more competent authority(ies) with allocated responsibilities for the certification and oversight of persons and organisations subject to this Regulation. This includes medical certification. In terms of competence of the competent authority to perform medical-related tasks, ATCO.AR.F.001 explains that ARA.MED.120 'Medical assessors' of Regulation (EU) No 1178/2011 (the Aircrew Regulation) is applicable for the relevant competent authority for Regulation (EU) 2015/340. ARA.MED.120 requires the competent authority to appoint medical assessor(s) that are licensed and qualified in medicine and have specific knowledge and experience in aviation medicine.

comment

150

comment by: *German NSA (BAF)*

Comment on ATCO.AR.A.010 Tasks of the competent authorities (8h) *the approval of training courses, training plans and unit competence schemes, as well as assessment methods*" (page 104):

It is not clearly defined how "course" and "plan" are to be understood. Therefore the following phrase is recommended: "the approval of training, unit competence schemes as well as assessment methods".

response

Not accepted

'Training plans' and 'training courses' are used in ATCO.AR.A.010 with reference to the specific requirements to approve initial and unit training plans, and unit endorsement, refresher, conversion, practical instructor and assessor training courses.

comment

171

comment by: AESA/DSANA

ATCO.AR.A.010 Tasks of the competent authorities

COMMENT

We suggest adding an additional task regarding facilitating the mutual recognition of the approval of the assessment method for the demonstration of language proficiency.

JUSTIFICATION

See paragraph "2.4.5 Align with other EU regulations and ICAO SARPs, correct errors and improve clarity": "Besides, EASA has received several queries from the competent authorities on the recognition of approval of method of assessment of language proficiency, which have led to following the approach already taken in the Aircrew Regulation. This shall clarify the intent of the rule, being that a certificate demonstrating the language proficiency of the applicant should be mutually recognised if the method of assessment is approved by any (other) competent authority."

response

Accepted

Text in ATCO.AR.A.010 will be modified to include facilitation of the mutual recognition of the approval of the assessment method for the demonstration of language proficiency.

comment

176

comment by: AESA/DSANA

ATCO.AR.A.010 Tasks of the competent authorities

COMMENT

There are still references in the NPA to the requirement of exchange the licence when this concept has been replaced by change the Competent Authority.

JUSTIFICATION

If exchange of licence is removed and changed by Change of Competent Authority, then all references to exchange of licence should be replaced by Change of Competent Authority in the NPA.

response

Partially accepted

Please refer to the response on comment #167.

ATCO.AR.A.020 Information to the Agency p. 103

comment	127	comment by: <i>German NSA (BAF)</i>	<p>Comment on ATCO.AR.A.020 (a) "...its delegated and implementing acts within 30 days from the manifestation of such problems." (page 105):</p> <p>The Timeframe is reasonable. However it would be helpful to have GM on the definition of "manifestation".</p>
response	<p><i>Partially accepted</i></p>		
	<p>The text is amended to promote clarity and thus, avoiding introduction of new GM on manifestation.</p>		

SUBPART D - ISSUE, REVALIDATION, RENEWAL, SUSPENSION AND REVOCATION OF LICENCES, RATINGS, ENDORSEMENTS AND AUTHORISATIONS p. 110

comment	292	comment by: <i>Danish Civil Aviation and Railway Authority</i>	<p>GM1 ATCO.AR.D.001(a) <u>APPLICATION FORM</u> FOR THE ISSUE, REVALIDATION AND RENEWAL OF LICENCES, RATINGS AND ENDORSEMENTS</p> <p>Should >ADV< be included in an application form for future licence to be issued?</p>
response	<p><i>Noted</i></p>		
	<p>No new ADV ratings will be issued in the future, but 'ADV' is included in the application form for the purposes of revalidation of a unit endorsement associated with an existing ADV rating.</p>		

ATCO.AR.D.003 Change of competent authority p. 113

comment	82	comment by: <i>CANSO</i>	<p>ATCO.AR.D.003 Change of competent authority</p>
---------	----	--------------------------	---



Upon receiving a licence holder's request for a change of competent authority, the receiving competent authority shall, without undue delay, request the competent authority of the licence holder to transfer, without undue delay all of the following: a verification of the licence; copies of the licence holder's medical records kept by that competent authority. The relevant medical history of the applicant, verified and signed or electronically authenticated by the medical assessor.

...

AMC1 ATCO.AR.D.003(a) (2) Change of competent authority

TRANSFER OF MEDICAL FILES

When transferring the summary of the applicant's relevant medical history and copies of medical records to the receiving competent authority, the transferring competent authority should include at least all of the following:

copies of:

the most recent aero-medical report containing the detailed results of the aero-medical examinations and assessments that are required for a class 3 medical certificate;

the application form, examination form, and medical certificate issued;

3) the most recent electrocardiogram (ECG), ophthalmological and ear-nose-throat (ENT), including audiometry, examination reports, as applicable for class 3 medical certification;

(4) the initial medical examination or the supporting documents for the last medical-file alternative;

(5) the mental health assessment, as applicable for a class 3 medical certificate; and

(6) any other relevant medical documentation; and

(b) the 'Summary of medical history' form of AMC1 ATCO.AR.D(a)(2), filled in and signed or electronically authenticated by the medical assessor.

O Only the medical certificate must be handed over. Afterwards the new medical competent authority (see previous remark) may, after the explicit approval of the ATCO concerned, exchange the medical history with the previous medical competent authority. This to allow for privacy in medical dossiers and to ascertain medical information stays within the required field of expertise. If this personal privacy is not guaranteed it would give issues with the GDPR obligations.

\

Suggestion: Leave out the obligation to exchange medical information between competent authorities. Only the exchange of the medical certificate is required. Leave open the possibility to the ATCO to allow for medical dossiers exchange between AME, AMC or AMS.

The responsibilities for the change of Competent Authority should be listed based on the defined CAs in article 6 (1) and (3) of the Cover Regulation.

Add: "without prejudice to provisions laid down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and to the applicable national legislation on medical information sharing."



response *Not accepted*

Please refer to the response provided to comment #139.

comment 139

comment by: *skeyes*

Only the medical certificate must be handed over. Afterwards the new medical competent authority (see previous remark) may, after the explicit approval of the ATCO concerned, exchange the medical history with the previous medical competent authority . This to allow for privacy in medical dossiers and to ascertain medical information stays within the required field of expertise. If this personal privacy is not guaranteed it would give issues with the GPDR obligations.

Suggestion:

Leave out the obligation to exchange medical information between competent authorities.

Only the exchange of the medical certificate is required. Leave open the possibility to the ATCO to allow for medical dossiers exchange between AME, AMC or AMS. The responsibilities for the change of Competent Authority should be listed based on the defined CAs in article 6 (1) and (3) of the Cover Regulation.

Add: "without prejudice to provisions laid down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and to the applicable national legislation on medical information sharing."

response *Not accepted*

Medical confidentiality in accordance with ATCO.MED.A.015 is required at all times. The exchange/handover of medical documents is done from the medical assessor of one competent authority to the medical assessor of the other competent authority, thus ensuring medical confidentiality.

comment 172

comment by: *AESA/DSANA*

ATCO.AR.D.003 Change of competent authority

COMMENT

"...(b) The transferring competent authority shall keep the licence holder's original licensing and medical records". Please, we suggest clarifying the period this records shall be kept. Further clarification is needed.

JUSTIFICATION

In order to have a common implementation of this requirement, the period this records shall be kept should be defined.

response *Not accepted*



The period for record-keeping is defined in ATCO.AR.B.015.

comment

246

comment by: *French DGAC*

P. 115 ATCO.AR.D.003 (a) (2)

Although we acknowledge the importance of medical confidentiality, in the current state of our electronic equipment, we cannot guarantee the confidentiality of the medical records electronic transmission between Member States.

We also understand that the repository that is under construction will not include a possibility of attaching medical records for a safe transmission. We suggest deleting the provision, or amending it in the following way:

“(a) (2) ... The medical records shall be transferred in a confidential manner in accordance with point ATCO.MED.A.015 of Annex IV (Part-ATCO.MED) as far as practicable...”

response

Not accepted

In accordance with ATCO.MED.A.015, medical confidentiality is required at all times when dealing with medical files of ATCOs. The exchange/handover of medical documents is done from the medical assessor of one competent authority to the medical assessor of the other competent authority, thus ensuring medical confidentiality. There are tools available that would ensure confidential exchange of such information; for example, confidential mail, encrypted e-mail, etc.

comment

293

comment by: *Danish Civil Aviation and Railway Authority*

In regard of following the process of handling the physical licence between the issuing CA, the text opens for interpretations and misunderstandings. To prevent such, it could be recommended to rewrite the text for a better clarification of the content.

(b) The transferring competent authority shall keep the licence holder’s original licensing and medical records.

Comment to (b):

It is understood as the transferring CA shall keep the licence holder’s original licensing data and medical records, not the physical licence, at least at this step of the transferring process.

(e) The receiving competent Until such a notification is received, the transferring competent authority remains responsible for the licence and the medical certificate originally issued to that licence holder.

Comment to (e):



response	<p>The meaning of "the transferring competent authority <u>remains responsible</u> for the licence" seems unclear. What is the transferring CA responsible of? Further, is the receiving CA to keep the previously physical licence surrendered by the holder, or shall it be sent to the transferring CA?</p>
	<p><i>Noted</i></p>
	<p>The understanding that the transferring CA shall keep the licence holder’s original licensing data and medical records, not the physical licence is correct. Point (b) mentions data and records but not the licence, so it should be clear.</p> <p>To remain responsible for the licence means that the transferring competent authority is the competent authority for the licence holder until receiving the notification on licence and medical certificate exchange as well as surrender of the old licence and medical certificate from the new competent authority.</p> <p>It is up to the competent authorities concerned to agree on whether there is a need to send the surrendered licence to the transferring CA.</p>

<p>AMC1 ATCO.AR.D.003(a)(2) Change of competent authority</p>	<p>p. 114</p>
--	---------------

comment	<p>139 ❖ comment by: <i>skeyes</i></p> <p>Only the medical certificate must be handed over. Afterwards the new medical competent authority (see previous remark) may, after the explicit approval of the ATCO concerned, exchange the medical history with the previous medical competent authority . This to allow for privacy in medical dossiers and to ascertain medical information stays within the required field of expertise. If this personal privacy is not guaranteed it would give issues with the GPDR obligations.</p> <p>Suggestion: Leave out the obligation to exchange medical information between competent authorities.</p> <p>Only the exchange of the medical certificate is required. Leave open the possibility to the ATCO to allow for medical dossiers exchange between AME, AMC or AMS. The responsibilities for the change of Competent Authority should be listed based on the defined CAs in article 6 (1) and (3) of the Cover Regulation.</p> <p>Add: “without prejudice to provisions laid down in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 and to the applicable national legislation on medical information sharing.”</p>
response	<p><i>Not accepted</i></p> <p>Medical confidentiality in accordance with ATCO.MED.A.015 is required at all times. The exchange/handover of medical documents is done from the medical assessor of</p>



one competent authority to the medical assessor of the other competent authority, thus ensuring medical confidentiality.

AMC2 ATCO.AR.D.003(a)(2) Change of competent authority

p. 115

comment

212

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

ATCO.AR.D.003 Change of competent authority, Page 115

Sweden supports this change.

response

Noted

comment

247

comment by: *French DGAC*

P. 117 AMC2 ATCO.AR.D.003(a)(2)

Most of the medical items required in this AMC should be easy for us to provide. However, we cannot guarantee that item n° 9 "Initial medical certificate – Date of issue – Date of examination - Type (European Class 3, Part ATCO.MED, or National)" will be available, as the national authority record keeping in France might not include medical records before 2008.

We suggest making this item 9 a recommended but optional item.

response

Partially accepted

The text has been amended to allow for an alternative when the initial medical certificate is not available.

ATCO.AR.D.005 Revocation and suspension of licences, ratings and endorsements

p. 116

comment

128

comment by: *German NSA (BAF)*

Comment on ATCO.OR.D.005(d) Revocation and suspension of licences, ratings and endorsements (page 118 and 119):

The "licence holder" and the "air navigation service provider" should change places as the licence is the professional qualification of an individual.

response

Accepted



The text is amended.

comment

173

comment by: AESA/DSANA

ATCO.AR.D.005. Revocation and suspension of licences, ratings and endorsements

COMMENT

No definition for revocation and suspension of licences, ratings and endorsements is included in the NPA.

JUSTIFICATION

A definition of suspension or revocation was not found in any other related regulation at EU Level. In order to have a standardised understanding across EU, a definition for revocation and suspension of licences, ratings and endorsements would be welcomed.

response

Noted

It is acknowledged that as such no definitions on ‘suspension’ or ‘revocation’ are provided in this Regulation.

However, it should be highlighted that the commented provision ATCO.AR.D.005 ‘Revocation and suspension of licences, ratings and endorsements’ provides enough details on the actions in the subject to be performed.

In addition, the Agency takes due consideration of the comment and invites the commentator to consider whether a more detailed rulemaking proposal on the issue would be possible.

comment

248

comment by: French DGAC

P. 119 ATCO.AR.D.005 (d)

The correction of the reference in (d) is not in line with the proposed amendment of ATCO.AR.A.010 in the same NPA.

The correction should be:

“(d) In cases of suspension.....the procedures established in ATCO.AR.A.010 (m)”

response

Accepted

The text is amended.



ATCO.AR.E.001 Application and c C ertification procedure for training organisations and issue of certificate

p. 118

comment 286

comment by: GATE Aviation Training

GM1 ATCO.AR.E.001(e)

Remarks in the attachment to the ATCO training organisation certificates may, as appropriate, be related to:

(c) contracts, agreements, or other arrangements between the training organisation and a third party and which concern the training(s)

GATE welcomes this GM which we believe is necessary as it will give clarification on some issues which, in our understanding, are managed in different ways by authorities. However, to support standardisation, we still see the need for further clarification on the following issues:

What details of the specific agreement with the ATC provider should be mentioned in the remarks in the attachment to the certificate?

There are cases that the ATC provider requires that the TO that should provide the continuation training has to prove first that it has the capability to provide such a training and that it is approved for it by CA. Can the CA in such a case mark in the TO's certificate that the TO has obtained the privilege to provide and conduct Continuation Training and make a remark directly in the certificate that the privilege is limited to cases when a specific agreement with the ATC provider is concluded, and the ATC provider is not an approved TO for such a training itself?

In the light of the above GATE Aviation Training also suggest the following change of ATCO.OR.B.010 should be:

(b) In order to ensure the applicablethe privilege to provide unit and/or continuation training.....

response *Partially accepted*

It should be highlighted that the 'guidance material (GM)' is non-binding material that helps to illustrate the meaning of a requirement and is used to support the interpretation of Regulation in question.

Considering this, the intent of the commented GM is to provide examples of possible remarks in the attachment to the ATCO TO certificate and not to provide an exhaustive list thereof.

On the other hand, the remarks are on a case-by-case basis and thus, the understanding of the commentator is correct.

The commentator is right in the sense that point (c) of this GM provides examples linked to ATCO.OR.B.010(b)(2).

As regards the comment on ATCO.OR.B.010(b), the proposal is accepted.



AMC1 ATCO.AR.E.001(b) Application and certification procedure for training organisations

p. 119

comment

294

comment by: *Danish Civil Aviation and Railway Authority*

GM1 ATCO.AR.E.001(e) Certification procedure for training organisations and issue of certificate

Comment:

Item (c) *contracts, agreements or other arrangements between the training organisation and a third party and which concern the training(s)*; can be supported and is seen in relation with a needed clarification within ATCO.OR.B.010, (b)(2). In the latter, it is the impression that there are some different interpretations in the EU on, if it is possible for an initial training organisation to obtain endorsements or remarks on their certificate, to be continuously allowed to engage in continuation training for an ANSP.

This question should be further clarified in the ATCO regulation.

response

Noted

It should be highlighted that the 'guidance material (GM)' is non-binding material developed by the Agency that helps to illustrate the meaning of a requirement and is used to support the interpretation of Regulation in question.

Considering this, the intent of the commented GM is to provide examples of possible remarks in the attachment to the ATCO TO certificate. The commentator is right in the sense that point (c) of this GM is providing examples linked to ATCO.OR.B.010(b)(2).

AMC1 ATCO.AR.E.010(a) Changes to the training organisations

p. 120

comment

7

comment by: *Croatian Civil Aviation Agency*

The proposal is to remove the point (a)(3).

Rationale:

Not all training organisations are also the service provider. So it might be very "ticklish" to notify the service provider about any change (especially related to management system) of the training organisation which has no connection with the service provider. For example, we have one training organisation which is certified for Basic Training and STD1 course, and one training organisation which is the same



	<p>company as service provider. We shouldn't share any information about any company (training organisation) with other organisations if there is not clear justification to do that. (Data protection law). We should do anything to prevent additional administration and especially any potential lawsuits which might occur on this topic.</p> <p>Another important thing is that the training organisations providing unit and continuation training (and other trainings, if applicable) usually have the same management system within their organisation so it is unnecessary to notify the service provider as they should have in place and fully operative management system and coordination between these two organisations holding two different certificates (SP and ATCOTO). So service provider which is also ATCO TO is always notified and gets written approval/rejection about any change approval request from competent authority.</p> <p>It is internal thing of the training organisation and if necessary service provider, so competent authority shouldn't share any information about any organisation under their responsibility if there is no justification and legal support for that.</p> <p>It is requested from service providers and training organisations to have clearly defined lines of responsibilities, defined processes and procedures and other management system requirements implemented. So, according to that, there should be clear coordination activities established between them without additional notification from competent authority for the changes which are well known in their company and of course of the change results.</p>
response	<i>Partially accepted</i>
	<p>The Agency takes the comment into consideration. The text should read '(3) notify the training organisation of its approval/rejection without delay.'</p>

comment	274	comment by: <i>GATE Aviation Training</i>
	<p><u>AMC1 ATCO.AR.E.010(a):</u> (3) notify the service provider training organisation of its approval/rejection without delay</p>	
response	<i>Accepted</i>	
	Text changed.	



comment	<p>284</p> <p style="text-align: right;">comment by: <i>GATE Aviation Training</i></p> <p><u>AMC1 ATCO.AR.E.015 (b)</u> (1) providing training in a way which introduces a significant risk to flight safety GATE Aviation Training would recommend giving examples of ways which introduce a significant risk to flight safety in the GM, especially for initial training. In our opinion this definition is very broad. Compared to point 1, points 2-5 are very specific.</p>
response	<p><i>Noted</i></p> <p>The Agency takes due consideration of the comment.</p> <p>The commentator is also kindly invited to consider whether a more detailed rulemaking proposal on the issue would be possible.</p>

AMC1 ATCO.AR.E.015(d)(2) Findings and corrective actions	p. 122
---	--------

comment	<p>249</p> <p style="text-align: right;">comment by: <i>French DGAC</i></p> <p>P 124 AMC1 ATCO.AR.E.015(d)(2) We approve the flexibility that will be provided by deleting this AMC</p>
response	<p><i>Noted</i></p>

APPENDIX 1 OF TO ANNEX II	p. 123
----------------------------------	--------

comment	<p>303</p> <p style="text-align: right;">comment by: <i>FOCA Switzerland</i></p>													
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">NPA (a, b, c, d, e, f, g)</th> <th style="text-align: left;">Reference (Chapter and page)</th> <th style="text-align: left;">Text NPA</th> <th style="text-align: left;">Proposal FOCA</th> <th style="text-align: left;">Justification</th> </tr> </thead> <tbody> <tr> <td style="vertical-align: top;">2021-08 a</td> <td style="vertical-align: top;">Appendix 1 to Annex II (a)(2)</td> <td style="vertical-align: top;">(XII) ratings and endorsements with expiry date (unchanged in this NPA)</td> <td style="vertical-align: top;">Add explanation for field XIIa (unit endorsements) Requirement to fill seal/stamp of the competent authority or</td> <td style="vertical-align: top;">Switzerland had received a finding during the standardization inspection in this regard and had to</td> </tr> </tbody> </table>	NPA (a, b, c, d, e, f, g)	Reference (Chapter and page)	Text NPA	Proposal FOCA	Justification	2021-08 a	Appendix 1 to Annex II (a)(2)	(XII) ratings and endorsements with expiry date (unchanged in this NPA)	Add explanation for field XIIa (unit endorsements) Requirement to fill seal/stamp of the competent authority or	Switzerland had received a finding during the standardization inspection in this regard and had to			
NPA (a, b, c, d, e, f, g)	Reference (Chapter and page)	Text NPA	Proposal FOCA	Justification										
2021-08 a	Appendix 1 to Annex II (a)(2)	(XII) ratings and endorsements with expiry date (unchanged in this NPA)	Add explanation for field XIIa (unit endorsements) Requirement to fill seal/stamp of the competent authority or	Switzerland had received a finding during the standardization inspection in this regard and had to										



			<p>signature of assessor in field XIIIa is still missing in the regulation.</p> <p>Add field XIIIa to the list of variable items with following proposed explanation: unit endorsement(s) with associated rating and, where applicable, rating endorsements. Validation of the unit endorsement is required providing seal/stamp of the competent authority or signature of the assessor.</p>	<p>adapt the licence tool in order to print the seal/stamp in field XIIIa on the licence.</p>
response	<p><i>Partially accepted</i></p>			
<p>GM will be provided to illustrate when signature/stamp of the authority or licence number and signature of the assessor are required in item XIIIa of the licence.</p>				

ATCO.OR.B.030 Findings	p. 129
-------------------------------	--------

comment

6

comment by: *Croatian Civil Aviation Agency*

Regarding the point (b) of this requirement I propose a change in text as follows:
 (b) define a corrective action plan that meets the **acceptance** by the competent authority; and

Also I propose that the word non-compliance is used instead non-conformance because non-compliance is used in Part-ATCO.AR (see ATCO.AR.E.015)

Rationale:

In requirement ATCO.AR.E.015(d)(2)(ii) is clearly stated that the corrective action plan has to be accepted and not approved.



	<p>There is the big difference in our State (and from my experience in other EU Member States) between acceptance and approval. Acceptance can be given by e-mail and any kind of letter. Approval means the legal act has to be given followed by the formal request (application). So it is very important to be transparent in terminology used in Regulation and AMC&GM, because simple word change complicates a lot and requests a lot of unnecessary administration by Competent Authority, and I don't think that it is the purpose of regulations, but the opposite - to reduce the administration burden within EU Member States.</p>
response	<p><i>Accepted</i></p>
	<p>During the rule development, a significant number of stakeholders requested the Agency to align as much as possible the provisions related to ATCO TO with the existing ones relevant to ATM/ANS providers unless there is a sector-specific reason for them to be different. The Agency agreed that in many cases the ATCO TO is also ATM/ANS provider. However, the Agency does acknowledge the rationale and accepts the proposals.</p>

<p>SUBPART C - MANAGEMENT OF AIR TRAFFIC CONTROLLER TRAINING</p>	<p>p. 129</p>
---	---------------

comment	<p>285 comment by: <i>GATE Aviation Training</i></p> <p><u>ATCO.OR.C.020 (c) Record keeping</u> GATE Aviation Training suggests decreasing the period down to 2 years: from issuance of the student ATCO licence for person undertaking the training - for instructor and assessor that ceased to perform a function in the initial training.</p>
response	<p><i>Noted</i></p> <p>The commented provision is not subject to this proposal and thus, the Agency takes note of the comment. The commentator is also kindly invited to consider whether a more detailed justification for the proposed issue would be possible.</p>

<p>ATCO.OR.C.010 Personnel requirements</p>	<p>p. 130</p>
--	---------------

comment	<p>151 comment by: <i>German NSA (BAF)</i></p> <p>Comment on ATCO.OR.C.010 Personnel requirements(d) <i>Training organisations shall maintain a record of theoretical instructors with their relevant professional qualifications, including demonstration of adequate knowledge and experience,</i></p>
---------	---



	<p><i>instructional techniques assessment and subjects they are entitled to teach (page 132):</i></p> <p>Is ther any guidance about how the demonstration of knowledge is structured or are there any guidelines in general?</p>
response	<p><i>Noted</i></p>
	<p>No guidance has been considered necessary.</p>

ATCO.MED.A.020 Decrease in medical fitness	p. 132
---	--------

comment	<p>152 comment by: <i>German NSA (BAF)</i></p> <p>Comment on ATCO.MED.A.020 Decrease in medical fitness (5) <i>are aware of being pregant;</i>(page 135):</p> <p>What does "aware of being pregnant" mean? Are there any guidelines? Is it necessary that the pregnancy is confirmed by an official medical entity e.g. an AME?</p>
response	<p><i>Noted</i></p> <p>The responsibility for the self-declaration in this case, also in accordance with ATCO.MED.060, belongs to the licence holder. The licence holders can become aware of being pregnant by home pregnancy tests or visit to the gynaecologist.</p>

PART ATCO.MED MEDICAL REQUIREMENTS FOR AIR TRAFFIC CONTROLLERS	p. 132
---	--------

comment	<p>296 comment by: <i>Danish Civil Aviation and Railway Authority</i></p> <p>Even if not in this NPA, we would like to comment on a general issue in PART.ATCO.MED, subpart C, ATCO.MED.C.025.</p> <p>With reference to (EU) 1178/2011, Annex IV, PART.MED.D.030, a requirement for renewal of the medical is missing in (EU) 2015/340. This issue has been raised with EASA previously.</p>
response	<p><i>Noted</i></p> <p>The difference stems from the fact that Part-MED was updated in 2019. Further alignment between Part-MED and Part ATCO.MED will be achieved by RMT.0424 starting in 2023.</p>



AMC2 ATCO.D.010(a) Composition of initial training

p. 143

comment 36 comment by: *Civil Aviation Authority the Netherlands*

On page 148:

In the explanation of the abbreviation FPL it should be 'Filed Flight Plan' instead of 'Field Flight Plan'

response *Accepted*

Text corrected.

comment 63 comment by: *CANSO*

'Field' Flight Plan should be Filed Flight Plan

response *Accepted*

Please refer to the response provided for comment #36.

comment 218 comment by: *Fintraffic Air Navigation Services*

Proposed text:
FPL Flight Plan or **Filed** flight plan

Rationale:
Correction of spelling error

response *Accepted*

Please refer to the response provided for comment #36.

comment 219 comment by: *Fintraffic Air Navigation Services*

Request for clarification regarding the term TRA "Temporary Reserved Airspace (ICAO)"

Rationale:



response	According to Skybrary and “EUROCONTROL (2010) EUROCONTROL Guidelines, The ASM Handbook, Airspace Management Handbook for Application of the Concept of the Flexible Use of Airspace, Ed. 3.0” TRA is defined as “Temporary Reserved Area ”
	<i>Accepted</i>
	Text complemented to include Temporary Reserved Area.

7. Quality of the document	p. 155
-----------------------------------	--------

comment	297	comment by: <i>French DGAC</i>
	<p>P. 157 Quality of the NPA</p> <p>7.1. The regulatory proposal is of technically good/high quality Fully agree / Agree / Neutral / Disagree / Strongly disagree</p> <p>France considers that the regulatory proposal is correct, however the questions raised by article 3 related to licences for military personnel taint the quality of the proposal.</p> <p>7.2. The text is clear, readable and understandable Fully agree / Agree / Neutral / Disagree / Strongly disagree</p> <p>7.3. The regulatory proposal is well justified Fully agree / Agree / Neutral / Disagree / Strongly disagree</p> <p>The proposal does not demonstrate the simplification value of the new system for air navigation services; furthermore, controllers’ competences will be harder to oversee.</p> <p>7.4. The regulatory proposal is fit for purpose (capable of achieving the objectives set) Fully agree / Agree / Neutral / Disagree / Strongly disagree Cf commentaire precedent Cf previous comment.</p> <p>7.5. The impact assessment (IA), as well as its qualitative and quantitative data, is of high quality Fully agree / Agree / Neutral / Disagree / Strongly disagree</p> <p>No impact assessment is included in the NPA</p> <p>7.6. The regulatory proposal applies the ‘better regulation’ principles Fully agree / Agree / Neutral / Disagree / Strongly disagree</p> <p>7.7. Any other comments on the quality of this NPA (please specify) /</p>	
response	<i>Noted</i>	



3. Attachments

 [20211007 ATCEUC Comments to EASA NPA 2021_8 final.pdf](#)

Attachment #1 to comment [#255](#)

 [FOCA comments - Stellungnahme SI zu NPA 2021-08.pdf](#)

Attachment #2 to comment [#304](#)

