



Answers to pre-notified questions

QUESTION/COMMENT	RESPONSE
Questions about training and human factor for ATCO/AFISO (list under construction)	-
Question about the obligation of having a light gun on the remote aerodrome	It is an obligation according to ICAO Annex 14 Volume 1, Ch. 5.1.3 and its use is described in ICAO Annex 2 as well as PANS-ATM (and in SERA). A procedural solution achieving an equivalent level of safety could also be acceptable, but in such case, the time aspect needs to be considered (the necessity to provide visual signals in a timely manner).
Question for SESAR : what should be the next focus of R&D in RTO	This topic was covered by the SESAR-presentation.
Questions about the training for ATSEP (list under construction)	-
Questions about the training for NSA inspectors (list under construction)	-
For Business Aviation the main interest of Remote Tower is to upgrade service from AFIS to ATC ones. Do you think that the proposed requirements are adapted to airports with limited traffic?	Yes. The material (guidelines/GM/AMC) are generic and applicable for all aerodromes provided with ATS (ATC or AFIS)
Guidelines chapter 6.4. Is there any security assessment methodology ANSP could apply to possible impact on cybersecurity issues? What are the actors (AD, MET, other?) who should be covered by such assessment?	For the time being, the only reference EASA is able to provide with regard to security assessment methodologies is the ongoing work of EUROCAE WG-72, subgroup ED-205. The EUROCAE ED-205 is expected for publication later this year. In reference to Commission Implementing Regulation (EU) No 1035/2011, Annex II, recital 3.2.1(c), all human resources affected by the change of the functional system shall be addressed by the safety assessment/SMS.
Guidelines chapter 12.3 Are operational effects for OH-AFIS to be identified by AFIS providers? (there are operational effects identified for OH-ATC, see 12.2)	Appendix 2 (ATC) and 3 (AFIS) are only collecting information available in the SESAR Safety Assessment Reports. In those documents there were no Operational effects developed for AFIS (as was done for ATC).



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<p>Guidelines chapter 12.4 What is the purpose, from the oversight of SESAR division between basic and advanced features? - basic means "at least"? - advanced – "nice to have"?</p>	<p>The division between 'basic' and 'advanced' features was used in SESAR as a method to try to find out the minimum equipage level needed for the various operational context/environments tested. The purpose in the guideline document is simply to provide an understanding of the SESAR results. The mandatory equipment/functions as well as "nice to have" functions needs to be determined in the safety assessment of each particular implementation, taking into account the local conditions.</p>
<p>I'm mostly in favour of the proposed NPA and would like to show support for EASA in general. Background information about the questions can be read up in my comments (Organisation: GdF – German Trade Union). If there is time, my questions would be:</p>	<p>Noted, EASA appreciate the expressed support for the NPA.</p>
<p>Guidelines chapter 2 Why the use of the word "external" and not a specific word like "optical"? (<i>Concerning the definition for 'Direct visual observation'</i>)</p>	<p>Agreed that the word 'optical' could potentially seem more appropriate than 'external'. As this has been also provided as a comment to the NPA, the proposed amendment will be assessed by EASA following the end of the NPA consultation.</p>
<p>Guidelines chapter 2 Why would ICAO 4444 8.10.2.3 not be applicable for identification in a remote tower? (<i>Concerning the definition for 'Identify/identification'</i>)</p>	<p>ICAO 4444 8.10.2.3 would be applicable in a remote tower in the same way as in a conventional tower for ATS Surveillance systems. However, the visual presentation / visual presentation system is not considered an ATS Surveillance System (see guidelines ch 6.6), therefore ICAO 4444 8.10.2.3 is not applicable to the visual presentation as such.</p>
<p>Guidelines chapter 2 Why does aircraft movement not include taxiing? (<i>Concerning the definition for 'Aircraft movement'</i>)</p>	<p>The definition of aircraft movement in the guideline doc ("Aircraft movement' means an aircraft take-off or landing at an aerodrome") was chosen in order to stress the most critical phases/situation of simultaneous traffic across aerodromes in 'multiple mode of operation'. Another option would be to define aircraft movement, for the purpose of this document, as "an aircraft take-off, landing or taxiing at an aerodrome as well as an aircraft flying in the area of responsibility." This would encompass all "aircraft movements" under the responsibility of the ATCO/AFISO at any one time. As this has been also provided as a comment to the NPA, it will be assessed by EASA following the end of the NPA consultation.</p>



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Guidelines chapter 5.2.5. Why does EASA think that ATCOs “look out the windows” instead of “maintain a continuous watch on flight operations”? (<i>Concerning the text in the first sentence of Ch 5.2.5: "...enabling the ATCO/AFISO to increase the time spent for 'looking out the windows'".</i>)	"Looking out the windows" is a prerequisite for being able to maintain continuous watch by visual observation. So the text is not meant to have the meaning/understanding as "instead of", it's just a way to describe it in different words. Compare with an aircraft cockpit head-up display, for which the effect is an increased time that the pilot can "look out through the windows" instead of looking down on the instruments. The same effect is what is desired here, but for the ATCO/AFISO.
Guidelines chapter 5.14.1.2. Why shouldn't taxiways be named differently?	This could potentially be a good idea. As this has been also provided as a comment to the NPA, the proposal will be assessed for inclusion by EASA following the end of the NPA consultation.
Related to camera (frame rate): What is the opinion of the group to what should be the minimum requirement for framerate (optical/mechanical)? (ref. ED240)	The recommendation from the RMG is presented in Ch. 5.2.4.3 of the Guidelines doc. <i>"The appropriate video update rate should be determined by the safety assessment taking into account the operational context in order to ensure an adequate presentation of moving objects to the ATCO/AFISO and assessing whether there is an operational need to see flashing/rotating objects, e.g. flashing lights."</i> As a support to this statement, a reference is given to the SESAR validation results as well as a reference to EUROCAE ED-240, where more information on this aspect can be found.
Chapter 4.1.1. of the guidelines document puts emphasis on the fact that traffic density will drive requirements for visual presentation. While traffic density certainly is a factor to behold, shouldn't traffic mix be a much more decisive factor?	Indeed, traffic mix would also be a factor for consideration, as partly indicated by Ch. 4.3.2. The person raising this question is invited to provide a comment in the same spirit as part of the NPA consultation.
Further regarding this point, it is noticed that in the text traffic mix and complexity are used synonymously (ch 4.1.4). Isn't there a difference between the two? Perhaps a definition in the beginning of the document will help?	Please provide this as a comment as part of the NPA consultation and a thoroughly review of the different expressions used throughout the document will be performed, with a view to streamline and clarify the expressions.
In Guidelines chapter 6.4 security vulnerabilities are directly linked to an impact on safety. While this is the case, looking at security only via a safety assessment only covers part of the problem. Shouldn't the wider impact be assessed through a dedicated security assessment?	The intention with chapter 6.4 is to highlight the need to perform a security risk analysis in the larger/full scope of Cyber Security. The results should be fed into the Safety Assessment. If the text could be understood differently, please provide a comment on this within the NPA consultation.



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<p>Guidelines chapter 7.2.2: Where is the relation with a typical remote issue? Shouldn't all aerodrome facilities comply with these requirements?</p>	<p>Indeed, all aerodromes are meant to have procedures in place for the safeguarding of the aerodrome. Typically, the term safeguarding refers to the protection of the aerodrome from man-made obstacles and human activities around the aerodrome, in order to prevent the aerodrome from becoming either unusable or affected (e.g. wildlife concentration, misleading lights, dazzling surfaces, interference with CNS facilities etc.).</p> <p>The intent of this paragraph however, is twofold:</p> <ul style="list-style-type: none">- on the one hand to draw the attention to the fact that the implementation of remote aerodrome ATS is associated with new type of facilities/equipment that need to be protected from various activities, within and outside the aerodrome, (e.g. cameras, sensors), and which need to be incorporated into the existing ("traditional") safeguarding activities of an aerodrome; and- to provide guidance as to the areas that attention should be given. <p>In other words, the paragraph does not introduce new requirements, but provides guidance for the implementation of existing provisions.</p>



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<p>From our experience (SESAR LSD 2.5), in particular in multiple remote tower set-ups, it proved to be beneficial that an ATCO is supported by an assistant for local communication activities as well as planning activities or to have an extra pair of eyes for the second airport. Even in single remote set-ups, an airport may need to have more than one controller available. Has the role of an assistant or second controller deliberately been avoided in this document? Or were there no substantial recommendations for task distribution among several controller roles?</p>	<p>The "assistant" role is not defined within the EU ATM/ANS regulatory framework, nor within ICAO provisions. Such a role, acting as a support to the ATCO in duty (the latter holding a valid ATCO license including the appropriate rating and unit endorsement(s) and therefore entitled to provide ATS), may however be defined at local level, including task and responsibility descriptions and the appropriate training scheme for the defined duties. Even though such a role is not described within the proposed guideline document (or else within the EU ATM/ANS regulatory framework), the possibility to define such a role at local level is not ruled out.</p> <p>Please note though that the possible support of a second controller (ATCO/AFISO) is mentioned briefly in ch. 5.14.1.1.</p> <p>Please also note that an assistant, not holding a valid ATCO license or the needed rating/unit endorsements, would not be entitled, nor allowed, to perform any ATC tasks.</p>