



Explanatory Note to Decision 2020/020/R

Acceptable Means of Compliance and Guidance Material to Part-PERS

Update of the initial-training objectives for air traffic safety electronics personnel

RELATED NPA 2020-04 AP — RMT.0719

EXECUTIVE SUMMARY

The objective of this Decision is to maintain a high and uniform level of safety by updating the acceptable means of compliance (AMC) and guidance material (GM) for the initial training of air traffic safety electronics personnel (ATSEP). This is achieved by regularly harmonising the training scheme and competence assessment for ATSEP with the evolving EU regulatory framework, state of the art, and recognised best practices in aviation.

This Decision amends the AMC and GM to Subpart A of Annex XIII (Part-PERS) to Commission Implementing Regulation (EU) 2017/373. More precisely, it updates the training objectives for ATSEP basic and qualification training syllabi and, therefore, improves the initial training content. It also introduces editorial and structural changes, provides updates of regulatory references, and makes improvements to AMC and GM that are not directly related to training objectives.

The amendments are expected to maintain safety and support providers of air traffic management/air navigation services (ATM/ANS) in developing, updating, and harmonising with EU rules their training syllabi.

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|-------------------------------|--|------------------------------|----------------------|
| Action area: | Regular update of ATM/ANS rules | | |
| Related rules: | Regulation (EU) 2017/373 and AMC&GM to Part-PERS | | |
| Affected stakeholders: | ATM/ANS providers, EASA Member States, competent authorities | | |
| Driver: | Efficiency/proportionality | Rulemaking group: | No, but expert group |
| Impact assessment: | No | Rulemaking Procedure: | Accelerated |

● EASA special rulemaking procedure milestones

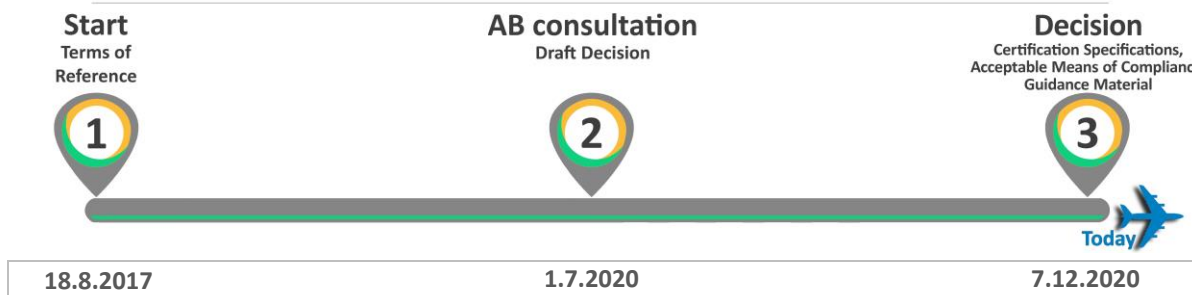


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1. About this Decision

The European Union Aviation Safety Agency (EASA) developed ED Decision 2020/020/R in line with Regulation (EU) 2018/1139¹ ('Basic Regulation') and the Rulemaking Procedure².

This rulemaking activity is included in the [European Plan for Aviation Safety \(EPAS\) 2020-2024](#) under rulemaking task (RMT).0719. The scope and timescales of the task were defined in the related Terms of Reference³.

The draft text of this Decision has been developed by EASA based on the input of an air traffic safety electronics personnel (ATSEP) expert group. EASA consulted the draft text of this Decision with its Advisory Bodies (ABs) through Notice of Proposed Amendment (NPA) 2020-04 **AP**⁴. During the AB consultation, 65 comments were received from all the interested AB parties, including industry, national aviation authorities (NAAs), air navigation service providers (ANSPs), and social partners. Prior to the AB consultation, EASA performed a focused consultation on the draft text of this Decision with the affected ATSEP stakeholders by holding a series of technical meetings in 2019 and 2020.

EASA reviewed the comments received during the AB consultation with the support of the ATSEP expert group. The comments received and EASA's responses to them are summarised under Section 2.4 below.

The final text of this Decision with the acceptable means of compliance (AMC) and guidance material (GM) has been developed by EASA based on the input of the ATSEP expert group and of the focused consultation.

The major milestones of this rulemaking activity are presented on the title page.

¹ Regulation (EU) 2018/1139 of the European Parliament and of the Council of 4 July 2018 on common rules in the field of civil aviation and establishing a European Union Aviation Safety Agency, and amending Regulations (EC) No 2111/2005, (EC) No 1008/2008, (EU) No 996/2010, (EU) No 376/2014 and Directives 2014/30/EU and 2014/53/EU of the European Parliament and of the Council, and repealing Regulations (EC) No 552/2004 and (EC) No 216/2008 of the European Parliament and of the Council and Council Regulation (EEC) No 3922/91 (OJ L 212, 22.8.2018, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1535612134845&uri=CELEX:32018R1139>).

² EASA is bound to follow a structured rulemaking process as required by Article 115(1) of Regulation (EU) 2018/1139. Such a process has been adopted by the EASA Management Board (MB) and is referred to as the 'Rulemaking Procedure'. See MB Decision No 18-2015 of 15 December 2015 replacing Decision 01/2012 concerning the procedure to be applied by EASA for the issuing of opinions, certification specifications and guidance material (<http://www.easa.europa.eu/the-agency/management-board/decisions/easa-mb-decision-18-2015-rulemaking-procedure>).

³ <https://www.easa.europa.eu/document-library/terms-of-reference-and-group-compositions/tor-rmt0719>

⁴ In accordance with Article 115 of Regulation (EU) 2018/1139 and Article 16 'Special rulemaking procedure: accelerated procedure' of MB Decision No 18-2015. EASA took the decision to follow the procedure laid down in said Article as this Decision addresses issues of non-controversial nature and affects a limited group of stakeholders. Therefore, NPA 2020-04 **AP** was not publicly consulted and was not published on the EASA website.

2. In summary — why and what

2.1. Why we need to amend the AMC & GM — issue/rationale

EASA identified the need to update the air traffic safety electronics personnel (ATSEP) training objectives in the [Explanatory Note to ED Decision 2017/001/R](#) (see Section 2.5.8, page 16): ‘[...] the training objectives [...] will need to be updated [...] to take into account the new technologies, including those stemming from the SESAR’.

The training objectives included in Appendices 1a-4a to Annex XIII (Part-PERS) to said Decision date back to 1996-2004. They originate from the former EUROCONTROL guidance material, which was developed in those days as the first guidance to ATSEP training in the European Union. In the period 2007-2009, and at the request of the European Commission, EUROCONTROL completely reviewed, updated, and raised to the level of a EUROCONTROL specification (i.e. EUROCONTROL-SPEC-132⁵) its ATSEP guidance. EUROCONTROL completed most of the content-related work in 2008. When drafting Part-PERS, EASA used EUROCONTROL-SPEC-132 as a starting point and decided to transpose the training objectives nearly unchanged (see [NPA 2013-08 \(A\) — Explanatory Note](#)⁶). The training objectives were lastly updated in 2008. In consequence, they cover neither new technological developments — e.g. remote-tower technology, data centre approach of air traffic services (ATS), latest network technologies — nor the Single European Sky ATM Research (SESAR) deployment (e.g. pilot common projects (PCPs)).

In addition, since 2011, numerous organisations have been meeting their training objectives by offering ATSEP training courses, thus gaining significant experience in the practicability and suitability of those training objectives. Based on that experience, several organisations established that certain training objectives needed careful rewording and/or releveling in terms of taxonomy.

Furthermore, personnel that is used by providers of air traffic management/air navigation services (ATM/ANS), such as ATSEP, should be appropriately qualified and trained to perform their duties. ATM/ANS providers should also implement training and competence assessment programmes, taking into account the different types of safety-related tasks that are performed by their personnel. Regulation (EU) 2017/373⁷, regarding the responsibilities of ATM/ANS providers, lays down detailed harmonised requirements for ATSEP to ensure the required level of safety.

Finally, EASA and other stakeholders identified a number of editorial errors in Part-PERS, which needed to be corrected.

⁵ EUROCONTROL ‘Specification for Air Traffic Safety Electronics Personnel Common Core Content Initial Training’, edition 1.0, 27.8.2009, ISBN: 978-2-87497-041-2.

⁶ Paragraphs 225 and 226, page 57.

⁷ Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011 (OJ L 62, 8.3.2017, p. 1) (<https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1589358633939&uri=CELEX:32017R0373>).

2.2. What we want to achieve — objectives

The overall objectives of the EASA system are defined in Article 1 of the Basic Regulation. This Decision will contribute to the achievement of the overall objectives by addressing the issues outlined in Section 2.1.

The specific objective of this Decision is, therefore, to maintain a high and uniform level of safety by harmonising the AMC and GM for the initial training of ATSEP. This is achieved by regularly harmonising the training scheme and competence assessment for ATSEP with the evolving European regulatory framework, state of the art, and recognised best practices in aviation.

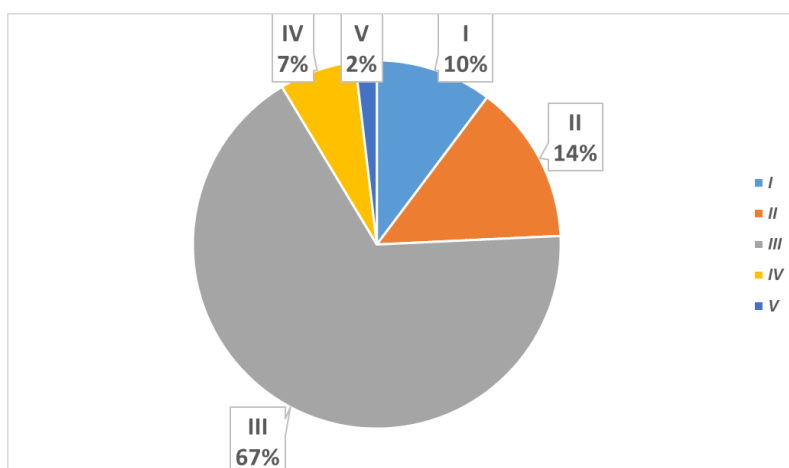
2.3. How we want to achieve it — overview of the amendments

2.3.1 Amendments to training objectives

Under RMT.0719, EASA and its stakeholders brought together a group of training experts (ATSEP expert group). The group took up its duties in October 2017 and completed its work in January 2020. The group started with a structured collection of amendment proposals. It associated those amendment proposals with training courses or qualification streams and categorised them according to the level of change. The group identified the following five levels of amendment:

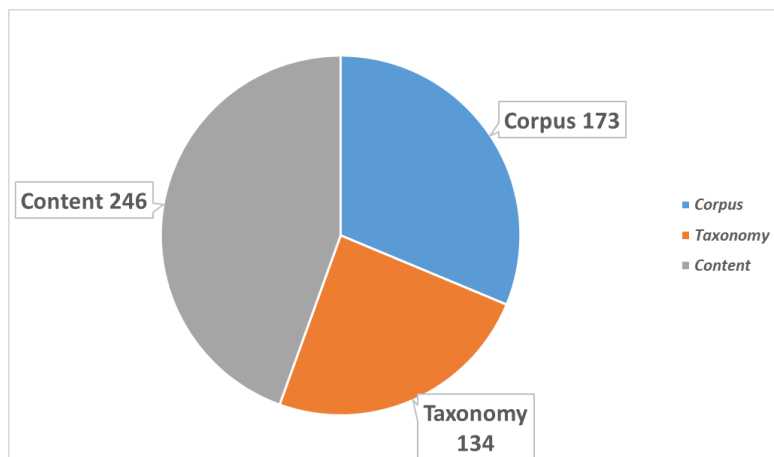
- Level I: typographical errors;
- Level II: editorial errors (content);
- Level III: training objectives;
- Level IV: structure of courses; and
- Level V: new courses.

The experts and their related organisations collected 371 amendment proposals, and distributed them across the five levels, as shown in the following graph:



EASA decided to work on Levels I, II, and III first. In several review sessions, the group assessed each amendment proposal and agreed on how to proceed with it.

Each training objective consists of three elements: a corpus, a taxonomy level, and content (see also Appendix 5a to Part-PERS). The group agreed on and introduced 553 changes, which are distributed to the three aforementioned training objective elements as shown in the following graph:



Update of subjects, topics, and subtopics

On the level of titles of subjects, topics, and subtopics, the group made some editorial adjustments. Those adjustments mainly relate to spelling conventions (upper/lower case), and not to the structure or the training objectives.

Update of training objectives (Appendices 1a-4a)

As outlined above, most amendments originate from technological evolution or experience in implementing the initial-training courses, or were intended to correct editorial errors.

Summary of amendments

The group introduced the following amendments:

- In EUROCONTROL-SPEC-132, the ATSEP basic course covers 11 subjects. EASA transposed only 10 of them, skipping the subject 'FACILITIES'. Based on the feedback from most training providers, the group reintroduced the subject 'FACILITIES' with 5 objectives into the ATSEP basic course.
- Most air navigation service providers (ANSPs) in the European Union do not operate microwave landing systems (MLSs). In 2008, this technology was most advanced but considered from today's perspective, MLSs were never established as a European standard. For this reason, the NAV⁸-MLS qualification stream (with its 35 training objectives) was deleted.
- The subject 'Functional safety' is part of all of the qualification streams. In most of these streams, the subject has identical training objectives. This is why the group moved this subject (with 12 distributed training objectives) to the shared qualification course, where it is located in one place for all ATSEP. A few training objectives on functional safety remain specific to the qualification stream 'Data Processing'.
- Due to the rising importance of information security, the group introduced a new subject on 'INFORMATION SYSTEM SECURITY' (ISS) into the shared qualification course. 14 new training objectives were identified and introduced into this subject.
- Unique objective identifier (UOID): for implementation, documentation, and audit purposes, EASA considers necessary to unambiguously and uniquely identify each training objective.

⁸ Navigation.

Therefore, a UOID is introduced, which also allows to designate training objectives across professions (e.g. ATSEP, air traffic controllers ATCOs, flight crew licensing (FCL)). Details on the UOID can be found in the revised Appendix 5a.

- Presentation of training objectives in Appendix 4a: multiple use of single training objectives (up to nine times) across different qualification streams leads to implementation challenges. To avoid ambiguity and errors, each training objective is now listed only once and assigned to the streams in a tabular format. Details can be found in the revised Appendix 5a.

In addition to the above-mentioned amendments:

- 3 new training objectives were introduced in basic parts;
- 13 new training objectives were introduced in qualification parts;
- 7 training objectives were deleted;
- the taxonomy level of 13 training objectives was increased; and
- the taxonomy level for 38 training objectives was decreased.

Amendments to the implementing rules (IRs) — Part-PERS

The scope of this amendment is limited to AMC and GM only. This led to some inconsistencies between the AMC and the AMC Appendices that are associated with points ATSEP.OR.205 and ATSEP.OR.210 of Part-PERS. EASA recognised that those inconsistencies create potential compliance issues. The training objectives that are affected by those inconsistencies can therefore not be mandated until the related IRs are amended. However, EASA recommends to implement the updates as soon as practicable.

The next IR amendment will address those inconsistencies along with other identified category IV and V issues.

Other information

As the training objectives of Appendices 1a-4a to the AMC and GM to Part-PERS are listed in long tables that cover a high number of pages, EASA decided to consult its Advisory Bodies (ABs) only on the 'clean' amended text of Appendices 1a-4a through NPA 2020-04 **AP**. Presenting the changes in those tables according to the current convention (using blue highlight and red strikethrough) is not optimal for long appendices with a lot of content. Therefore, Attachment A 'Appendices 1a-4a to AMC and GM to Part-PERS' to this Decision provides a 'clean' text of the amendments to Appendices 1a-4a (see also Chapter 5). A 'Change information document' that indicates the individual changes at training objective level is available upon request in excel format for informative purposes and to support implementation. The latter document has no legal effect (see also Chapter 5).

2.3.2 Additional AMC for ATSEP training for the various types of ATM/ANS activities

As explained above, ATSEP that is used by ATM/ANS providers should be appropriately qualified and trained to perform their duties. Therefore, the measures taken in this respect by ATM/ANS providers should be proportionate to the nature of, and risks associated with, the different types of ATM/ANS activities. ATM/ANS providers should focus such measures on the objectives to be achieved, while allowing different means of achieving those objectives. In doing so, they should take into account interdependencies between safety and performance in the various technical domains.



Following these principles and considering the feedback from the ATSEP training implementation (e.g. from data (DAT) service providers), EASA introduced new AMC1 ATSEP.OR.200 ‘Training requirements’ and GM1 ATSEP.OR.200 ‘Training requirements’, as well as AMC1 ATSEP.OR.300 ‘Competence assessment — General’ for providers of meteorological (MET) services, aeronautical information services (AIS), and DAT services, to enable the crediting of the ATSEP training. The new AMC and GM facilitate the flexible use of available resources by providing enhanced opportunities for employee mobility.

2.3.3. Deletion of GM

GM2 ATSEP.OR.210: this GM is deleted because it is considered to be a duplication of the text of GM1 ATSEP.OR.210 ‘Qualification training’ that allows ATM/ANS providers to add subjects or topics that are specific to their national or local environment. Therefore, the intent of the deleted GM remains.

GM2 ATSEP.OR.210(b): this GM identifies only two recognised routes to achieve SMC competence, which limits the options of implementing other means. However, there are potentially other valid routes where any combination of streams, including at least one SMC stream, is compliant with the rule. Therefore, this GM is deleted because it is considered incomplete and misleading.

2.4. What are the stakeholders’ views

The main comments received during the AB consultation of 2020-04 **AP** were on the Explanatory Note and on AMC1 ATSEP.OR.200 ‘Training requirements’.

(a) Explanatory Note

Many commenters noted the discrepancy between the Explanatory Note of the draft NPA that was agreed by the ATSEP expert group during its last meeting and the Explanatory Note of NPA 2020-04 **AP**.

The explanatory note of an NPA is not part of the proposed amendments to the AMC and GM, and, therefore, not subject to changes to its content based on comments that are received during consultation. However, EASA recognised that some information was omitted or explanation was inaccurate. Therefore, the Explanatory Note to this Decision is now harmonised with the one that was agreed by the group and incorporates the additional necessary amendments that stem from the consultation.

(b) AMC1 ATSEP.OR.200 ‘Training requirements’

The majority of the comments indicated that this AMC should not be limited to ‘non-complex’ providers of MET services, AIS, DAT services, and flight procedure design (FPD) services. To ensure a minimum harmonisation level in Europe, this AMC should be applicable to all such service providers, regardless of their complexity. If the AMC were not amended, proportionality and a risk-based approach would be restricted only to ‘non-complex’ service providers. However, in the context of Regulation (EU) 2017/373, ‘complexity’ is not based on the nature of, or the risks associated with, services or activities; instead, it is linked to the type of a certificate. Also ‘complex’ service providers may be responsible only for services and activities that are for example used for flight planning purposes only. Safety risks that are associated with those types of services, activities, and systems may be significantly lower than those associated with decision-making during operations (e.g. take-off and landing).



2.5. What are the benefits and drawbacks

EASA accurately assessed the applicable and due-to-be-applicable EU legislation, as well as the development of technologies, against the content of the training objectives. In doing so, EASA made only the necessary adjustments to the AMC and GM to Part-PERS. Therefore, this Decision does not change how the training and competence assessment of ATSEP is performed today. The Decision only provides more consistent and up-to-date training objectives.

The drawbacks of the Decision are limited to the potential slight increase in duration of the basic and qualification training. This is due to the introduction of the subjects 'FACILITIES' and 'INFORMATION SYSTEM SECURITY' (ISS) into the training objectives. However, that potential increase in duration could be offset by the reduction in the taxonomy levels of some training objectives.

Consequently, the impact of this Decision is considered to be low. Therefore, no impact assessment (IA) was developed.



3. How do we monitor and evaluate the rules

As this Decision addresses non-complex and non-controversial issues, no specific monitoring is recommended for this RMT. EASA will use feedback gathered from oversight activities in the following years to assess the implementation benefits of the proposed amendments and possible need for improvement.



4. References

4.1. Related regulations

Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight, repealing Regulation (EC) No 482/2008, Implementing Regulations (EU) No 1034/2011, (EU) No 1035/2011 and (EU) 2016/1377 and amending Regulation (EU) No 677/2011 (OJ L 62, 8.3.2017, p. 1)

4.2. Related decisions

Executive Director Decision 2017/001/R of 8 March 2017 issuing Acceptable Means of Compliance and Guidance Material to Commission Implementing Regulation (EU) 2017/373 'Common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight'

4.3. Other reference documents

EUROCONTROL 'Specification for Air Traffic Safety Electronics Personnel Common Core Content Initial Training', edition 1.0, 27.8.2009, ISBN: 978-2-87497-041-2 (EUROCONTROL-SPEC-132)



5. Related document

Attachment A 'Appendices 1a-4a to AMC and GM to Part-PERS' (see Section 2.3.1, p. 7)

