ANNEX B

TABLE OF RECEIVED COMMENTS

1. The following table details all the comments received as part of the 'Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow' Consultation.

2. The table headings are as follows:

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a) The first column refers to the unique number assigned to the comment during the review process.

b) The **'§ No'** column cross-refers to the relevant paragraph number in the 'Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow'.

c) The **'Comment', 'Reason(s) for Comment'** and **'Proposed Change/Text'** columns copy exactly the textual comments as provided in the Consultation Response Sheet.

d) The **'Response'** column provides the detailed response to the comment.

e) The **'Disposal'** column provides information about the way the received comment was treated.

f) The **'Organisation'** column identifies the source of the comment.

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
1	Page 24 :	code 888 needs to be clarified.			AÉROPORT DE PARIS GROUP	Agree to remove code 888 from the Specification see responses to comments #11 and #12.	**Accepted**
2	Page 43	5.16 TIME - Duration of the delay : The term "warning check" needs to be clarified. ADP points out the resources requested to treat the delay causes.			AÉROPORT DE PARIS GROUP	The warning has no consequence on processing of the data. It is displayed on the DANSAP (APDF web-based tool) for information. Agreed to replace "Warning check for flights where:" by "An informational warning is displayed on the APDF web-based tool for flights where:" Upon review of the ODI TIME we also note the need to clarify the value of DLY_TIME as follows: "DLY_TIME≥(AOBT-STD)-00:05:00. Where DLY_TIME = TIME1+TIME2+TIME3+TIME4+TIME5"; We also note the need to clarify the consistency and comparability checks as follows: "≥ 90% of the flight records in the departure data files need to comply with: DLY_TIME ≥ (AOBT-STD) - 00:20:00"	**Accepted**
3	Page 24 : APDF-RFS-230-R para 3) code 888	For a good understanding, an example may be inserted.			AÉROPORT DE PARIS GROUP	Agree to remove code 888 from the Specification see responses to comments #11 and #12.	**Partially Accepted**
4	Page 11, para 1.5 CONVENTIONS	HD (highly desirable) disappears and O (optional) is introduced. An explanation of the difference beetween these 2 terms may help the entities.			AÉROPORT DE PARIS GROUP	Requirement conventions for EUROCONTROL Specifications are either "shall", "should", or "may". As a result the HD terminology for the drafting of the requirements has been removed.	**Partially Accepted**
5	Page 4.	Addition 1: Pleas add the page with "DOCUMENT CHANGE RECORD" where the complete history (from 2014) of the successive editions of the document will be presented with the reason for change. Addition 2: Pleas add the information about the previous (currently binding) specification and when it should be repealed and replaced.			PANSA	Addition 1: The purpose of "Document Change Record" will be to list the changes between successive published Released Editions of the Specification. The history of the successive drafts prior to Edition 1.0 are no longer documented in the Released Edition. The successive changes of prior drafts can be found in the draft material. Addition 2: This EUROCONTROL Specification will formalise the current performance data process under the SES and EUROCONTROL frameworks as a published Released Edition 1.0, thereby superseding any prior draft material.	**Noted**
6	Page 1-58.	Comment 1. Please explain how this specification (EUROCONTROL-SPEC-tbd) address the IR390 data collection process with defined data providers: "Airport operators and air carriers" and why in the title of draft specification "ANS" is included: "EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow". This scope encompasses the requirement of Regulation (EU) No 390/2013, Article 1, Para 3 [2] which refers to 70.000 IFR air transport movements. In Poland: Warsaw Frederic Chopin Airport (IATA: WAW, ICAO: EPWA).			PANSA	This Specification supports as well the EU regulatory requirements on data reporting in particular, Regulation (EU) No 390/2013 Annex V section airport operator. Air transport operators will be subject to a separate specification which is under development and due to be launched for public consultation (it will be named AODF – air transport operator data flow). Irrespective of the regulatory 70 000 threshold, any airport that reports performance data to EUROCONTROL needs to comply to this Specification. We will add reference to Article 21 of Regulation (EU) No 390/2013 in the executive summary. We also note that the separator used in section 1.4 for 70.000 is incorrect and will be removed. "70.000" will be replaced by "70 000".	**Partially Accepted**
7	Page 1-58.	Comment 2. Please add definitions for: a. reporting entity, b. operational ANS performance monitoring, c. EUROCONTROL Performance Review System, d. Single European Sky Performance Scheme, e. mandatory fields, f. recommended fields g. ANS,			PANSA	Reporting entity is already defined in Section 1.7. Agreed to add ANS to the list of abbreviations in Section 1.7 and the missing abbreviation for CSV. The conventions for requirements are defined in Section 1.5 including the letter-code status mandatory (M), recommended (R), or optional (O). These letter-codes are also explained under the Tables 3 and 4 where they are used.	**Partially Accepted**

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
8	Page 1-58.	Comment 3. Please explain scope of the changes proposed in this specification (EUROCONTROL-SPEC-tbd) to the previous specification EUROCONTROL DPS-PRU-QMS-Spec01 “Airport Operator Data Flow – Data Specification” (Edition Number: 00-11 Edition Date: 04-09-2014 Status: Draft Intended For: Reporting Entities, Airport Operator Data Flow Category: Data Processing Procedures).			PANSA	Edition Number: 00-11 dated 04-09-2014 has a working draft status. This draft edition 1.0 is intended to become the first published version of the Specification that will bear the status “Released Issue”. In order to reach this status the formal consultation on the document has been organised following the EUROCONTROL Standards Development Process. In terms of content, there is no technical change apart from the introduction of two new ambiguity codes for delay code reporting. The use of these has been reviewed, notably one of them (888) has been removed and the other (000) is not mandated – see responses to comments #11 and #12.	**Noted**
9	Page 1-58.	Comment 4. Please explain scope of the changes proposed in this specification (EUROCONTROL-SPEC-tbd) to the previous draft specification EUROCONTROL-SPEC-tbd “EUROCONTROL Specification for Operational ANS Performance Monitoring Air Transport Operator Data Flow” (Edition Number : v2.0 Edition Date : 03.10.2016 Status : Working Draft Intended for : General Public Category : EUROCONTROL Specification).			PANSA	The working draft of the Air Transport Operator Data Flow (AODF) will be subject of a forthcoming formal consultation. This will be organised following the EUROCONTROL Standards Development Process with the intention of publishing a “Released Issue” of that Specification. Where data reporting requirements support a similar purpose, the technical requirements of AODF will be aligned to those of this Specification (APDF).	**Noted**
10		We find that Eurocontrol in the “Specification on Operational ANS Performance Monitoring Airport Operator Data Flow (ESDP/18-001)” is requesting data that is very similar in nature to the data that will be received via the AOP-NOP integration ref. the PCP. We suggest that Eurocontrol investigate if data received via the AOP-NOP integrations can support the requirements of Eurocontrol PRC, PRB, PRU & CODA. This would alleviate costs both on the airport side and on Eurocontrol side – costs that eventually would be put on the airspace users. We share the concern expressed in the Copenhagen Airport comment.			CAA Denmark	Copenhagen airport has not submitted comments to the consultation. Copenhagen Airport has already successfully been submitting data files in line with this Specification since 2015. Please note that the Agency already makes use of other reported data such as ETFMS for performance monitoring purposes. In some specific cases there may be duplication in data reporting which is further used for quality assurance purposes. Synergies with other data flows provided to the Agency will be investigated with regard to the new PCP regulations.	**Noted**

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
11	Page 24 - APDF-RFS-230-R	"…, ensuring that the reported delay contributions (i.e. TIME1 + TIME2 + TIME3 + TIME4 + TIME5, as applicable) does not exceed the actual delay (i.e. AOBT- STD)." Background: The measurementof the timestamp AOBT differs between airports and airlines generally. Therefore the measured delays are different but deviations of more than one minute are rare. Delay information will be prepared generally for complete delay minutes. Therefore even the deviation of one second in measuring can cause differences in the necessary delay minutes. Example: STD 12:00:00 AOBT (airport): 12:23:59 □ 23 delay minutes AOBT (airline): 12:24:00 □ 24 delay minutes Having received more delay minutes than AOBT-STD the airport might request the airline to send a correction movement, however this means costs for the airlines. But since the delay data in the airline system should match with the airport delay information, this would be the only way to correct this. Above that, only airlines have the right to allocate delay codes and -times. In this context we would like to point out the following fact: Comparing MUC´s off AOBT time stamps (automatically generated) to the AOBT extracted from the airline´s departure movement the deviation can be up to 25 minutes, in rare cases even more. Unfortunately airlines still use "brake released"/ "beacon on" as "their" definition for off block time in order to make flights more on time than they are! That is why most of the AO times are considerably earlier than the airport operator´s off block time stamps. Example vice versa: STD 12:00:00 AOBT airport: 12:20:00□ 20 minutes delay AOBT airline 12:00:00 □ no delay□ no delay code In order to avoid different time stamps in different data bases, airlines would necessarily have to adopt the changes into their own systems else it would not make any sense. Subsequently we would have to deal with different figures in various analysis- at the end it´s becoming more and more confusing.			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	We acknowledge the possible difference in calculated delays by air transport operators and airport operators. This Specification mandates the delay reporting as calculated by the airport operator. There is no requirement on the reporting entity to further coordinate such time discrepancies with the air transport operator. To clarify the requirement on the reporting entity, APDF-RFS-230-R will be split into the two following requirements:. "APDF-RFS-230-O To allow for a proper accounting of various delay contributions, additional delay causes (DLY2 up to DLY5) and their delay duration (TIME2 up to TIME5) may be provided in the flight record. APDF-RFS-240-M Unless five delay causes and times are already identified for a flight record, when the sum of the reported delay durations (by the air transport operator and/or ground handler and/or other) is less than the calculated delay (AOBT-STD), the time difference shall be reported in the flight record as an additional delay, using delay cause code ZZZ." See also response to comment #12 with regard to the alignment of the Notes of Section 3.3.2. As a result, the reporting entity can report a delay in excess of the calculated delay. Within the Agency these discrepancies between reported delays are measured and may be subject of future quality assurance processes.	**Noted**
12	Page 24 - APDF-RFS-230-R, Note 1 + 2	"…then the code 999 is to be inserted as the DLY1 value ... " and "… then the code 888 is to be used …" In MUC (and other airports) more than 99.9% off the delay reasons are converted into an IATA- based standard and send to PRU. Only in case of an unknown new delay code or a wrong delay code (mistake in writing) we will translate to 999. As a matter of fact we only use "999" in case according to definition "no (final) clearing could take place", for example because the delay code was rejected by the responsible clearing partner and the airline did not send a new revised delay code. Why 888? What is the benefit to differ between 888 and 999? In both cases (note 1 and note 2) there are some minutes of delay where the reasons are unknown. The delay code 888 has no benefit and should not be introduced. Airports have other possibilities to identify unknown delay codes. For analysis the delay codes 888 and 999 must be handled in the same way. Unnecessary costs will be generated for this change request at every airport.			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	We acknowledge the correct use of code 999, only used in exceptional circumstances where the provided code for the associated delay cannot be cleared or converted. In cases where no associated delay code information is provided, the code ZZZ shall be used. We agree to remove code 888 from the Specification. We will also clarify that the Notes below APDF-RFS-230-R also apply to APDF-RFS-220-M. Therefore the following modifications will be made: a) The indentation of the notes will be left aligned and edited as : "Notes for requirements APDF-RFS-220-M to APDF-RFS-240-M (refer to ODIs RDLY and TIME in Section 5):" b) Note 2 will be deleted, the use of 888 will be removed from the Specification c) Note 4 will be complemented by the sentence; "Code ZZZ can also be inserted as the DLYn in cases of multiple delays where there is a time difference between the total delay duration and the actual delay (AOBT minus STD)." d) ODI-RDLY comment field will be edited as follows: "Delay codes are to be provided in the following code formats: (…) — 3-digit code 999 or 000 (see below notes); or — 3-letter code ZZZ (see below notes)" e) ODI-RDLY value field will be corrected as follows (see also response to comment # 21 justifying the need to amend the first two lines): "Regex patterns: - [0-9]{2} or [0-9]{2}[A-Z]{1}; or - [A-Z]{2} or [A-Z]{3}; or - [9]{3} or [0]{3}; or - [Z]{3}" f) ODI-RDLY note field will be edited to remove the description of the use of code 888. Example for delay reporting will be made available on the public	**Partially Accepted**

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						EUROCONTROL website and notified to stakeholders.	
13	Page 24 - APDF-RFS-230-R, Note 3	“If for technical reasons the reporting entity is incapable of processing the delay codes, the code 000 is to be inserted as the DLY1 value for ODI RDLY”. Technical reasons are an exception!. The reasons for missing delay information is normally not available- we can only speculate. A clear distinction between ZZZ and 000 is absolutely missing. Again, unnecessary costs will be generated for this change request at each airport. The delay code 000 has no benefit and should not be introduced. The delay code ZZZ (note 4) is sufficient.			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	The need to clarify the use of codes ZZZ vs 000 is agreed. Code ZZZ is to remain and to be used if neither the air transport operator nor the ground handler (or any other appropriate entity) provided information (regarding the cause of the delay). See clarification of the use of code ZZZ in the response for comment #12 for Note 4. The introduction of the ambiguity code 000 augments the ambiguity codes identified in the draft versions to cater specifically for the cases where the processing of delay information cannot yet be provided as part of the regular reporting. Note 3 will be clarified as follows: “3) If the reporting entity is implementing the processing of delay codes, the temporary use of delay code 000 for DLY1 may be permitted following coordination with EUROCONTROL PRU. The associated field TIME1 is to be populated with the result of the actual delay, in minutes (AOBT minus STD).” The implementation of code 000 by the reporting entities will no longer be mandated by this Specification. This note will be moved to become the last note on page 24.	Partially Accepted
14	Page 26 - APDF-RFS-300-M, Note 1	“… and the code cannot be cleared and/or converted …” Cancellation reasons are provided by airlines. In most cases airports aren’t able to verify this information. Therefore a clearing process doesn’t take place. Cancellation reasons are accepted unchecked. Please, change: “… and the code cannot be cleared and/or converted …”			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	In analogy to the delay code reporting, the requirement addresses the situation when information from the airspace user is received in an unknown format. The requirement does not stipulate the existence of a ‘clearing process’ (i.e. and/or).	Rejected
15	Page 26 - APDF-RFS-300-M, Note 3	“… if the actual time of cancellation is not available …” In MUC (and other airports) the actual time of cancellation is normally not available. All we can provide is the time when an airline reports a flight to be cancelled and the airport enters this information into the AODB. If PRU insists on this “real” cancellation time, MUC would also send 01-01-1990 00:00:00 for every cancellation in the future.			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	Agreed, the wording will be adapted to cater for the ‘reception’ of the time of cancellation which is assumed to be a proxy for the actual time of cancellation. Note 3 will be reworded as follows: “3) If the actual time of cancellation by the airspace user is not available, the reporting entity is to consider the time of entry into the airport system as the actual time of cancellation. In all other cases, the value 01-01-1990 00:00:00 is to be inserted as the UTC value for ODI ATOC.” In reviewing this Note 3 we have identified that “airline” needs to be replaced by “air transport operator” in Note 2.	Accepted
16	Remark Page 52 – 55	The latest IATA Delay Code lists (AHM 730 & 731) are from 2016, edition 36 – needs to be updated urgently!			MUNICH AIRPORT INTERNATIONAL (APT/MUC)	Agreed, the most recent IATA Delay Code lists will be listed from edition 38. Annex A and B. These will be complemented by a note indicating that these codes are regularly updated by IATA and that the latest delay codes will be made available on the public EUROCONTROL website and notified to stakeholders.	Accepted
17	APDF-RFS-230-R – Page 24	We are facing some difficulties about the interpretation of this section	a. Remark 1 : code 999 “1) If a non-standard IATA code or sub-code for a given delayed flight is provided or coordinated (e.g. by the air transport operator or ground handler) and the code cannot be cleared and/or converted into any of the standard IATA codes (i.e. AHM730 or AHM731, see Annex), then the code 999 is to be inserted as the DLY1 value for ODI RDLY.” ☐ Is this the example below the right understanding? Example: DLY1 = 89S TIME2 = 30min DLY2 = XXX TIME2 = 9min DLY3 = 87V TIME3 = 7min		STAKEHOLDER #1	Agreed. The wording will be changed accordingly in Note 1 as: “(…) the code 999 is to be inserted as the respective DLYn value for ODI RDLY.” There is no required order for the reported delays.	Accepted

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
			Before: DLY1 TIME1 DLY2 TIME2 DLY3 TIME3 DLY4 TIME4 DLY5 TIME5 89S 30min xxx 9min 87V 7min Then, if we apply 999 code it will be: DLY1 TIME1 DLY2 TIME2 DLY3 TIME3 DLY4 TIME4 DLY5 TIME5 999 9 min 89S 30min 87V 7min DLY1 becomes DLY2, because it's the longest delay, then DLY3 stays delay 3. Is that correct?				
18	APDF-RFS-230-R – Page 24		b. Remark 2 : code 888 "2) If there is a divergence between the delay code(s) or sub-code(s) provided or coordinated in terms of the duration(s) that cannot be cleared, then the code 888 is to be used for that portion of the delay for which a clearing is not possible between the airport operator and air transport operator (or ground handler) with the appropriate delta of the time duration" Which of the example below is the right understanding? Example 1: DLY1 = 89S TIME2 = 30min DLY2 = 83W TIME2 = 9min DLY3 = 87V TIME3 = 7min TIME1+TIME2+TIME3 = 46min STD = 16h00LT AOBT= 16h50LT AOBT-STD = 50 minutes ≠ (TIME1 + TIME2 + TIME3) (AOBT-STD) – (TIME1+TIME2+TIME3) = 4minutes If it's not possible to analyses which delay get the wrong time, where do we put the 888 code and delta of time? DLY1 TIME1 DLY2 TIME2 DLY3 TIME3 DLY4 TIME4 DLY5 TIME5 89S 30min 83V 9min 87V 7min If we put 888 on DLY4 with appropriate delta of time, because in that case we cannot know which delay have the wrong time, how do we manage the situation in which we have 5 delays (finally, how many delay are we able to integrate in the data base?) DLY1 TIME1 DLY2 TIME2 DLY3 TIME3 DLY4 TIME4 DLY5 TIME5 89S 30min 83V 9min 87V 7min 888 4min Example 2: DLY1 = 89S TIME2 = 30min DLY2 = 83W		STAKEHOLDER #1	See response to comment #12 on the use of codes 999 and 888. The use of code 888 is removed from the Specification. In the <u>example 1</u> mentioned, the delta of the delay (4 min) should go to DLYn=ZZZ and TIMEn=4 There is no required order for the reported delays. Regarding the situation in which they already have 5 delays these cases are very rare and experience has demonstrated 5 delay codes are more than enough. Note that a new requirement APDF-RFS-240-M will be inserted in the Specification see response to comment #11. For the <u>example 2</u> APDF-RFS-230-R will be replaced, see response to comment #11 (APDF-RFS-230-O/ APDF-RFS-240-M)	Accepted

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
			TIME2 = 9min DLY3 = 87V TIME3 = 7min TIME1+TIME2+TIME3 = 46min STD = 16h00LT AOBT= 16h40LT AOBT-STD = 40 minutes ≠ (TIME1 + TIME2 + TIME3) (AOBT-STD) – (TIME1+TIME2+TIME3) = -6minutes How do we manage a « negative » time? In that case, we took table 4 interpretation. DLY1 TIME1 DLY2 TIME2 DLY3 TIME3 DLY4 TIME4 DLY5 TIME5 89S 30min 83V 9min 87V 7min 888 -6min				
19	APDF-RFS-230-R – Page 24		c. Remark 3 : code 000 / ZZZ “3) If for technical reasons the reporting entity is incapable of processing the delay codes, the code 000 is to be inserted as the DLY1 value for ODI RDLY. The associated field TIME1 is to be populated with the result of the actual delay, in minutes (AOBT minus STD).		STAKEHOLDER #1	See response to comment #13 which rewords the Note and clarifies the use of codes ZZZ and 000.	Noted
20	APDF-RFS-230-R – Page 24		4) If for a given delayed flight neither the air transport operator nor the ground handler (or any other appropriate entity) provided information regarding the cause of the delay, then the code ZZZ is to be inserted as the DLY1 value for ODI RDLY. The associated field TIME1 is to be populated with the result of the actual delay, in minutes (AOBT minus STD).” 000 : we already apply this for FLTTYP = N ZZZ : we already apply this for FLTTYP = S Finally, what is the real difference between 3/ et 4/ and how can we identify if the reason of the lack of delay cause is due to technical reasons?		STAKEHOLDER #1	The flight type is not relevant to the use of 000 or ZZZ. See response to comment #13 which rewords the Note and clarifies the use of codes ZZZ and 000.	Noted
21	APDF-RFS-230-R – Page 42 – RDLY / APDF-RFS-230-R – Page 46 – RCNL	Currently, we don’t use sub codes in our data. In order to be able to furnish that kind of data we will have to: - Configure our actual and future airport softwares to process sub-code information - Inform and train our staff, especially operational staff in charge of airport delay supervision, is not familiar with these appellations - Aware Airlines / Handlers about giving this correct sub-code information in their SITA message We cannot establish a development plan without more precision of these new measures, but we know for sure that it will take time.			STAKEHOLDER #1	The provision of codes without sub-codes is agreed. The ODI RDLY will be reworded as follows: “Delay codes are to be provided in the following code formats: “(…) — 2-number code with an optional 1-letter sub-code from IATA's Airport Handling Manual 730 and 731 (highly recommended); or — 2-letter code with an optional 1-letter sub-code from IATA's Airport Handling Manual 730 and 731; or (…)” The same changes will be applied to the ODI RCNL comment field. Similar to the response to comment #12, the ODI RCNL value field will be updated as follows: “Regex patterns: — [0-9]{2} or [0-9]{2}[A-Z]{1}; or — [A-Z]{2} or [A-Z]{3}; or — SSIM: [A-Z]{4}; or — Special codes: [9]{4} and [Z]{4}” EUROCONTROL welcomes the ideas of enhancing the local delay code reporting and data collection processes.	Accepted
22	Page 24 - APDF-RFS-230-R	Not acceptable under any circumstances “…, ensuring that the reported delay contributions (i.e. TIME1 + TIME2 + TIME3 + TIME4 + TIME5, as applicable) does not exceed the actual delay (i.e. AOBT- STD).” Background The measurement of the timestamp AOBT differs between airports and airlines generally. Therefore the measured delays are different but deviations of more than one minute (AOBT, Airline > AOBT, airport) are rarely (at least at FRA).			FRAPORT AG (APT/FRA)	In response to point 1: This specification mandates the delay reporting as calculated by the airport operator. There is no requirement on reporting entity to further coordinate such time discrepancies with the air transport operator. See response to comment#11.	Accepted

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
		Delay information will be prepared generally for complete delay minutes. Therefore even the deviation of one second in measuring can cause differences in the necessary delay minutes. Example: STD 12:00:00 AOBT (airport):12:23:59 23 delay minutes AOBT (airline): 12:24:00 24 delay minutes DC1/DM1: 96/10 DC2/DM2: 03/14 DC – delay code; DM – delay minutes The “correction” of delay minutes exceeding the actual delay shall not be executed by airports. 1. The airports have to correct in a lot of cases arbitrary. How should the “correction” be executed? There are some possibilities: a) Reduction of first or last delay information, e. g. 96/09; 03/14 or 96/10; 03/13 b) Reduction of delay code with the most / less minutes? c) Weighted reduction of all delays, e. g. 96/9,6 and 03/13,4 (not integer) d) … 2. The clearing process at the airports will be enlarged unnecessarily. Airports have to inform the airlines about “corrected” delay minutes with the aim of achieving high transparency 3. The “correction” generates unnecessary costs at each airport. 4. If the “correction” is important for PRU analysis it can be done easily by PRU and for each airport in the same way. Remark: In the other direction (AOBT, airline < AOBT, airport) there are often deviations of some minutes.				In response to points 2, 3 and 4: It is understood that the clearing process is designed for identifying substantial inconsistencies between the reporting by the airspace users/ground handlers and the airport operator. Variations within the time window are acceptable and should not require additional effort or coordination.	
23	Page 24 - APDF-RFS-230-R, Note 1	“… the code 999 is to be inserted as the DLY1 value …” “As the DLY1” is correct when all provided codes are unknown. But often only one of the provided codes is unknown. Example: airline provides: DC1/DM1: 87/10 minutes DC2/DM2: ‘non-standard IATA code’/13 minutes airport provides to PRU: DC1/DM1: 87/10 minutes DC2/DM2: 999/13 minutes Actually FRA (and other German airports as well) convert any incoming non-IATA delay code into an IATA- based standard and send it to PRU. Only in case of an unknown new delay code or a wrong delay code (mistake in writing) FRA will translate to 999.			FRAPORT AG (APT/FRA)	This applied process is correct and fully appreciated.	Noted
24	Page 24 - APDF-RFS-230-R, Note 2	“… then the code 888 is to be used …” Why 888? What is the benefit to differ between 888 and 999? In both cases (note 1 and note 2) there are some minutes of delay where the reasons are unknown. airline provides: DC1/DM1: 87/10 minutes DC2/DM2: 93/13 minutes At the moment in both cases (note 1 and note 2) the delay code 999 is used at FRA. At FRA (and other airports) more than 99.9% off the delay reasons were translated (FRA-MUC-Matrix). That means the code 999 (code 1) would be used in future only in exceptional cases. In the end note 1 and note 2 means that the present-day delaycode 999 will be changed to 888. Unnecessary costs will be generated for this change request at each airport. The delay code 888 has no benefit and should not be introduced. Airports has other possibilities to identify unknown delay codes. For analysis the delay codes 888 and 999 must be handled in the same way.			FRAPORT AG (APT/FRA)	The use of 888 will be removed from the Specification. See response to comment #12.	Accepted
25	Page 24 - APDF-RFS-230-R, Note 3	Not acceptable under any circumstances “If for technical reasons the reporting entity is incapable of processing the delay codes, the code 000 is to be inserted as the DLY1 value for			FRAPORT AG (APT/FRA)	The implementation of code 000 by the reporting entities will no longer be mandated by this Specification. See response to comment #13.	Partially Accepted

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#	§ No	Comment	Reason(s) for Comment	Proposed Change/Text	Organisation	Response	Disposal
		ODI RDLY”. The delay code 000 has no benefit and should not be introduced. The delay code ZZZ (note 4) is sufficient. Technical reasons are (hopefully) once in a blue moon. In this cases the knowledge of the reasons for missing delay information is normally imprecise also. (Did the airline provide? yes/no?). So the airport cannot differ between ZZZ and 000. Again, unnecessary costs will be generated for this change request at each airport.					
26	Page 26 - APDF-RFS-300-M, Note 1	“… and the code cannot be cleared and/or converted …” Cancellation reasons are provided by airlines. In most cases airports aren’t able to verify this information. Therefore a clearing process doesn’t take place. Cancellation reasons were assumed unchecked. Please, change: “… and the code cannot be converted …” It is possible to convert the non-standard IATA codes to 9999 at each airport when the data are prepared to 390/2013 data. But it is also possible to make this conversion by PRU when uploading the data. That is much cheaper.			FRAPORT AG (APT/FRA)	See response to comment #14.	Rejected
27	Page 26 - APDF-RFS-300-M, Note 3	“… if the actual time of cancellation is not available …” At FRA (and other airports) the actual time of cancellation is normally not available. Instead of that we provide the timestamps when we take over the cancellations in our AODB. According to note 3 we have to provide 01-01-1990 00:00:00 for each cancellation in future.			FRAPORT AG (APT/FRA)	Agreed, the wording will be adapted to cater for the ‘reception’ of the time of cancellation which is assumed to be a proxy for the actual time of cancellation. See response to comment #15 for the intended changes in the Specification.	Accepted
28	ODI 5.15 RDLY - Delay causes	As long as the sub delay codes for ATC restrictions (i.e. 81, 82, 83) are not being transmitted in a slot allocation / revision message it is not possible to fulfil this ODI. There is no way that an airport can be obliged to search the respective sub code. The more so because Eurocontrol has the specific reason available and must be able to add the respective sub code to a SAM / SRM. As soon as this happens we will implement sending sub codes.			ZURICH AIRPORT LTD.	Agreed that the use of sub-codes should be optional for ODIs RDLY and RCNL. See response to comment #21.	Accepted
29		The reporting processes described would add a significant amount of work for the entities involved. We cannot quantify this amount of work or the potential need for additional personnel, based on the documents provided. In order to reduce the additional workload it is probably necessary that certain support systems for ATC services at TWR be modified. Thus not only ATCOs from TWR will see an increase in their workload, but also significant financial investments will be required and also an extended period of time for implementation. The documents did not provide details about covering these additional costs. Also there were no details regarding the integration of these systems for all entities involved. Furthermore, the specifications should clarify how all the stakeholders involved in the process will each of them contribute to implementing the reporting activities at their respective level and responsibilities.			ROMATSA R.A.	The document is a purely technical document specifying the reporting requirements for identified reporting entities. In that respect the Specification does not get into the costs or distribution of responsibilities. The referred collaboration between different stakeholders may differ locally. Concerning Romania, Bucarest LROP is already adhering to the content of this Specification as of July 2018. Another airport for which this Specification might be applied is Bucarest Baneasa (LRBS). The data submission process for LRBS is not yet established.	Noted
30		Dear colleagues, one of the reasons for obligating an Airport operators to provide operational data is the need of validation of other data sources that the Agency processes. Please keep in mind that Some of the operational data from AODF data files is imported from local ANSP flight monitoring radar data and after that these data files are provided to Eurocontrol.			STAKEHOLDER #2	This Specification addresses the data reporting requirements of a reporting entity under the EUROCONTROL Performance Review System and the Single European Sky Performance Scheme. The reason for the data collection is not for validating the Agency’s data but the collection of data for the performance analysis. It is noted that locally part of the operational data might require an exchange between the airport operator and ANSP. The actual implementation of this interface is outside the scope of the Specification and may differ on a local level. Next to the airport operator data flow a related Specification for the collection of operational data from airspace users, i.e. AODF, is being developed. See also response to comment #10.	Noted
31		With consideration to the correspondence of Rainer Koelle from August 27, 2018 which includes a more detailed explanation of the introduction of the two relevant codes 000 and 888 following findings could be pointed out:			AIRPORT DUSSELDORF (APT/DUS)	See above responses to comments #11, #12 and #13 on the use of codes 999, ZZZ, 000, and 888. Code 888 will be removed from the Specification and code 000 will not be	Noted

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		PRU DUS DUS perception/implementation 000 99B (defined as „deviation AOBT: airline vs. airport“) no delay code allocation from reporting entity (technical solution) ZZZ 99B no delay code allocation from reporting entity (technical solution). No provision of delay code/minutes at all. Non-standard codes are not translated. No technical solution yet (for delay code and delay minutes). Thus it is not part of our delay clearing procedure yet. Only reported delay codes are in the scope of our delay clearing procedure. What is in fact the difference between 000 and ZZZ? 999 DL n/a, are currently not considered unformatted delay codes. Delay code could not be allocated. Minutes are part of our evaluations though. Delay code not found/available, which will be reduced drastically as soon we implemented the delay code matrix for translation. Until then requirement by PRU: Consideration of airports‘ AOBT in order to be able to calculate the proper delay duration. PRU would receive 999/[delay minutes] On the other hand 888 should be allocated “if a portion of the delay cannot be cleared with the associated duration“. Based on the airports‘ timestamps the delay code clearing procedure takes place. The difference between AOBT minus STD represent the delay minutes that need to be explained by the reporting entity (and the diviation can partially be very differently). Case A: reported delay minutes < accounted delay minutes according DUS timestamps □ Time difference will be automatically allocated to 99B (technical solution) PRU would receive 888/[alledged DUS delay minutes of 99B]. How to distinguish between other 99Bs? DUS does not distinguish between the above mentioned PRU codes. With the implementation of the delay code clearing procedure in 2012 we are coping these cases as described above. Any adjustment would cause efforts of all types especially in terms of costs regarding technical improvements, comparisons of data sets are not given anymore, staff trainings need to be taken into account.etc. Case B: reported delay minutes > accounted delay minutes according DUS timestamps □ The duration of the airport relevant delay codes (DL19, 85, 86, 87, 89) will be reduced manually on the day of operation. In doing so it represents only a one-sided display of accounted delay minutes as remaining delay codes are not taken into account. In order to gain a more representative depiction it is desirable to introduce an overall technical downstream solution by PRU itself □ harmonized approach Special attention to postponed flights as the delay duration discrepancy may have major deviations: Departures that have been cancelled today, but are departing tomorrow are handled differently. The reporting entity is sending the final delay duration from yesterdays‘ STD until todays‘ AOBT, whereas DUS approves only the final/new coordinated STD of the actual flight date.				mandated by the Specification. With regard to Case A, note that code 99B is not a recognised IATA code. The use of sub-codes will be clarified as being optional, see response to comment #21. In order to facilitate the processing of the received data, the use of IATA codes is essential. With regard to Case B, EUROCONTROL appreciates the effort in implementing the delay code clearing process at EDDL airport.	
32	p.42 5.15 RDLY-Delay causes,	the DUS delay code clearing procedure is based on described background info plus we implemented DUS specific subcodes in order to gain more detailed delay information due to our extraordinary infrastructure.			AIRPORT DUSSELDORF (APT/DUS)	The effort by EDDL airport is noted. See also response to comment #31 on the use of sub-codes.	**Noted**

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33	p.47 5.20 ATOC – Actual time of cancellation:	If a flight needs to be cancelled on the operational day the ATOC is always given at DUS as the timestamp is automatically set (Time now) as soon as the RCNL is recorded and saved by the person in charge. However how are flights handled by PRU if they are cancelled today for tomorrow?			AIRPORT DUSSELDORF (APT/DUS)	Agreed, the wording will be adapted to cater for the 'reception' of the time of cancellation which is assumed to be a proxy for the actual time of cancellation. See response to comment #15 for the intended changes in the Specification. PRU processes operational cancellations based on the timestamp which includes date information. Operational cancellations from one day to the next are handled in accordance to the definition in the ODI STATUS ("the flight was confirmed by the air carrier the day before oeprations and/or it was containined in the daily list of flights scheduled produced by the airport operator the day before operations").	Noted
34	APDF-NCH-020-M	non-conformance should be identified to the user as part of the original submission so that issues can be verified within the current reporting month. I am concerned that this will result in additional APDF overhead which is out of sync with the normal reporting cycles – making it more difficult to the airport top react. This needs to be clarified – does this include the normal automatic rejection of anomalies or extend to post submission notification of abnormalities?			STAKEHOLDER #3	The non-conformance is handled by the web interface during the submission of the data files by the reporting entity. The online tool used for the submission includes a parser and it is only accepted when the file content is compliant with the Specification. In case of non-compliance or non-conformance, the tool provides detailed feedback on the reason why the files are being rejected. As a result we reviewed this section and will clarify APDF-NCH-010-M, APDF-NCH-020-M and APDF-NCH-030-M as follows: "APDF-NCH-010-M During the submission of data files by reporting entities the EUROCONTROL APDF web-based tool **shall** inform the reporting entity about the identified non-conformances. APDF-NCH-020-M Reporting entities **shall** address non-conformances by submitting the corrected data files in compliance with this Specification. APDF-NCH-030-M If the data files corrected in accordance with APDF-NCH-020-M cannot be submitted within the reporting cycle, the reporting entity **shall** notify EUROCONTROL PRU." APDF-NCH-040-R no longer serves any purpose and will be removed. APDF-DSC-010-M will also be updated to reflect the term "APDF web-based tool".	Accepted
35	APDF-NCH-050-M	please specify. How many issues lead to escalation? 2 is suggested.			STAKEHOLDER #3	An escalation coordination with the appropriate national authority is launched based on the understanding of the underlying issues of the reporting entity to remedy the identified non-compliances and imperfections of the data reporting. For the time being, EUROCONTROL considers this under the discretion of the operational experts involved and the proposed remedial actions the reporting entity commits to undertake. Two issues justifying escalation can be identified: persistent non-conformances and the absence of a remedial action plan. Accordingly, this Specification will be reworded as follows: APDF-NCH-050-M EUROCONTROL PRU **shall** withdraw the compliance status of a reporting entity in case of persistent non-conformances (i.e. two consecutive reporting cycles) and the absence of any remedial action plan. APDF-NCH-060-M If a reporting entity's compliance status is withdrawn, EUROCONTROL PRU **shall** launch the escalation procedure with the appropriate national authority / sponsor." The Note will be complemented by the following sentence: "Escalation is only launched after expert assessment of the underlying issues faced by the reporting entity."	Accepted
36	APDF-POL-030-M	again, more clarity on what this means please. When would the airport expect notification that this has been rejected? During submission or later?			STAKEHOLDER #3	The requirements of this Specification are firstly checked through the online submission tool. A non-compliant data file will be rejected during the submission. It is understood that the reporting entity will attempt to improve the data and attempt a re-submission within the reporting cycle. APDF-POL-030-M refers to section 2.4. See response to comment #35	Accepted

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						which clarifies the rejection/re-submission requirements of Section 2.4.	
37	APDF-RFS-100-M	we propose the submission of CAN records as a Recommended requirement.			STAKEHOLDER #3	APDF-RFS-300-M is a mandatory requirement. Note that this is also an EU regulatory requirement. Cancellations are part of the changes to the demand, and play a role in assessing the local performance in terms of resources provided (i.e. service provision), the level of quality of service (observed performance in light of traffic demand).	**Rejected**
38	APDF-RFS-200-M	we propose the submission of CAN records as a Recommended requirement			STAKEHOLDER #3	See response to comment #37.	**Rejected**
39	APDF-RFS-230-R	"If there is a divergence between the delay code(s) or sub-code(s) provided or coordinated in terms of the duration(s) that cannot be cleared, then the code 888 is to be used for that portion of the delay for which a clearing is not possible between the airport operator and air transport operator (or ground handler) with the appropriate delta of the time duration" - this is not clear what is meant by divergence - nor is it clear what the rationale is for the new code to be introduced.			STAKEHOLDER #3	Code 888 will be removed from the Specification and time divergence has been clarified. See responses to comments #11 and #12.	**Accepted**