

SUMMARY OF RESPONSES (SOR)
DOCUMENT FOR THE

**Draft EUROCONTROL Specification for Operational ANS
Performance Monitoring - Airport Operator Data Flow**

Formal Consultation 8 August 2018 – 31 October 2018

DOCUMENT CHANGE RECORD

The following table records the complete history of the successive editions of the present document

Edition Number	Edition Date	Reason for Change	Pages Affected
0.1	23 November 2018	First draft	All

INTRODUCTION

1. General

The Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow, details the data exchange requirements between reporting entities and EUROCONTROL, and subsequent data handling processes. It supports the regular operational ANS performance monitoring and reporting under the EUROCONTROL Performance Review System established under the ECAC Institutional Strategy for Air Traffic Management (1997) and the Single European Sky Performance Scheme established under Implementing Regulation (EU) No 390/2013.

2. Scope of consultation

As required by the EUROCONTROL Regulatory and Advisory Framework (ERAF), the draft Specification was circulated for comment between 8 August 2018 and 31 October 2018 using the EUROCONTROL Notice of Proposed Rule-Making (ENPRM) mechanism for formal consultation. The formal consultation allows all States, Stakeholders and interested parties to express their formal views on the draft EUROCONTROL Specification.

The consultation documentation comprised the draft Specification and related Consultation Response Sheet. In the Response Sheet, the addressees were asked to express their formal view on the draft Specification. Copies were sent directly to the following:

- Civil and Military regulatory authorities and key ATS providers of each EUROCONTROL Member State;
- Regulatory authorities of States' observers at the Provisional Council;
- EC, ECAC, FAA, ICAO, NATO;
- International Organisations having observer status at the Provisional Council;
- Key trade and professional associations having observer status at the Provisional Council;

Chairmen of the following bodies:

- CMIC;

- PRC;
- SRC
- AAB;

The documentation was also made available through existing working arrangements and to members of the public via the EUROCONTROL web site.

3. Purpose and structure of the document

The purpose of this Summary of Responses (SOR) document is to provide a consolidation of the main comments received as part of the formal consultation activity, as well as to provide EUROCONTROL's responses to, and disposal of, those comments.

The responses section (of the document is structured as follows:

General Response – providing a general analysis of the comments received;

Consolidated Comments and Responses – summarising the comments made and providing the associated responses.

Two annexes are provided with the document as follows:

Annex A contains a list of those Stakeholders that provided comments on the draft Specification;

Annex B provides a table containing all of the comments provided by Stakeholders, the proposed 'disposal' by EUROCONTROL and cross-references to the responses within the main body of the document.

OUTCOME OF FORMAL CONSULTATION

1. General Response

A total of 14 Stakeholders responded to the consultation. Out of these 14 Stakeholders, 3 were Air Navigation Service Providers (ANSPs), 2 Civil Aviation Authorities (CAA) and 9 Airports. The 14 Stakeholders provided a total of 39 separate comments.

The Stakeholders responding to the consultation considered for most of them the Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow to be acceptable although could be improved and submitted some proposals for improvement. Two stakeholders stated that the Specification was not acceptable under all circumstances, however informal exchanges with those stakeholders revealed that the Specification would be acceptable on the basis of amendments proposed in Annex B.

The following table shows the distribution of the overall result of the comments across the Stakeholder categories:

Response category	A	B	C	D	Total by stakeholder
Stakeholder category					
ANSP	1	0	2	0	3
CAA	2	0	0	0	2
Industry	0	0	0	0	
Airports	2	3	2	2	9
Airspace User	0	0	0	0	
Military	0	0	0	0	
Responses received per category	5	3	4	2	14

Legend:

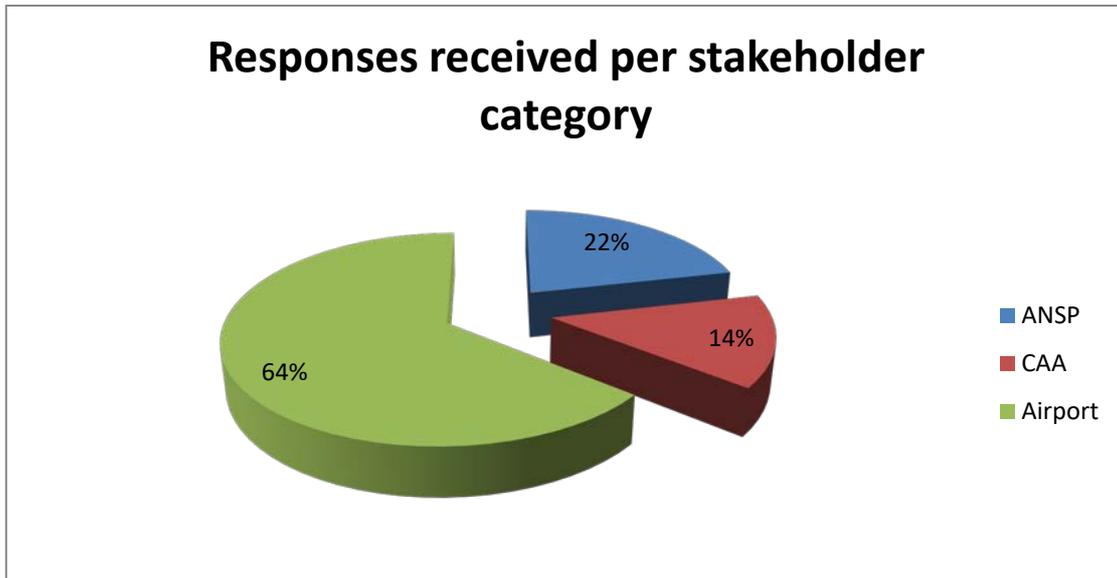
A = Acceptable without amendment

B = Acceptable but would be improved with amendments

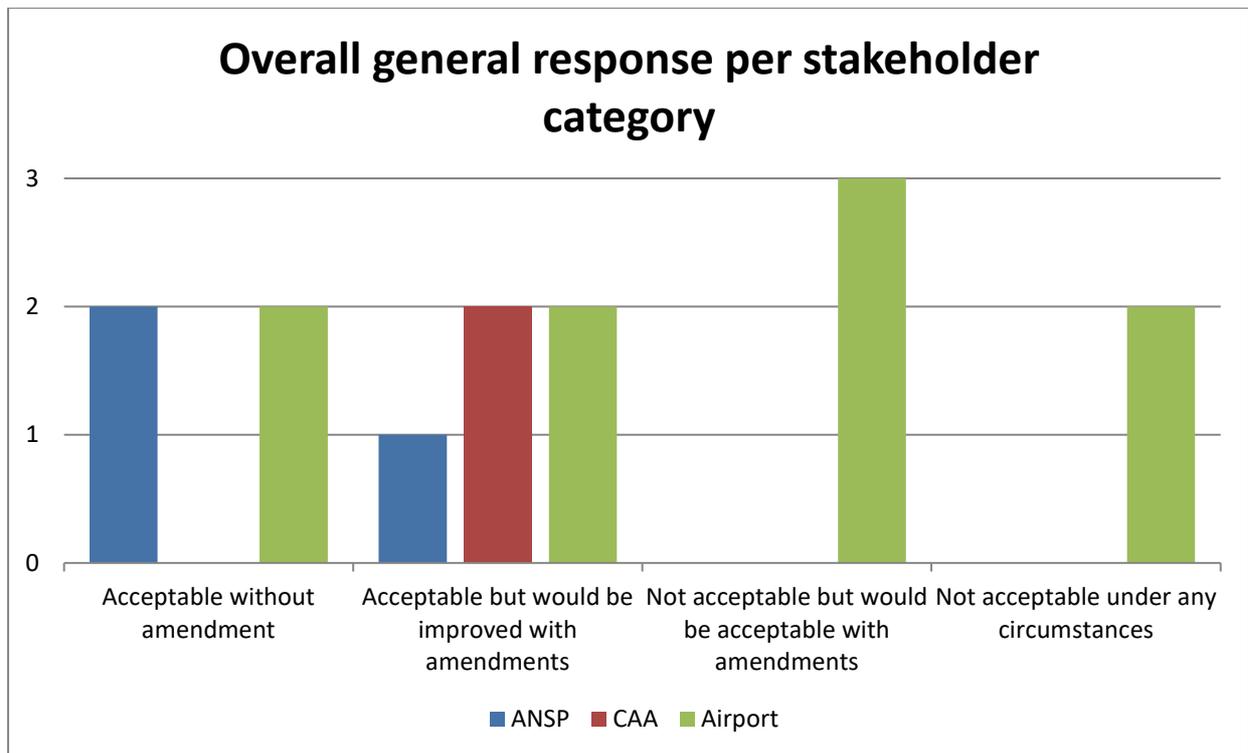
C = Not acceptable but would be acceptable with amendments

D = Not acceptable under any circumstances

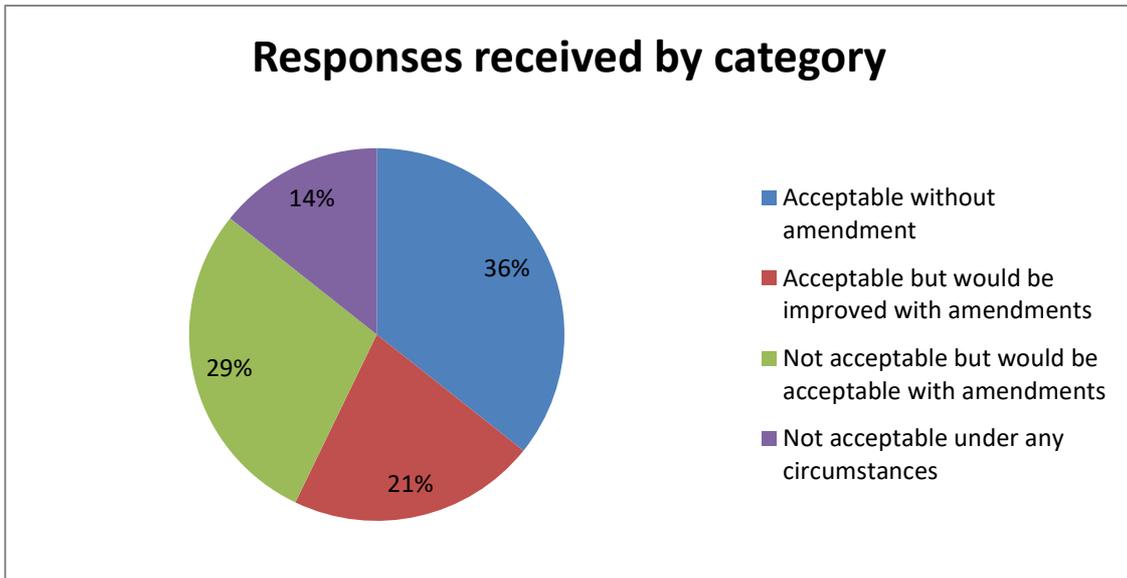
The distribution of the Stakeholders that submitted comments during the consultation period is shown in the chart below.



The breakdown of the overall general responses about the draft Specification is shown in the chart below.



The detailed breakdown per stakeholder type of the overall general responses about the draft Specification is shown in the chart below.



2. Consolidated responses

2.1. Introduction

This section summarises the main issues arising from the consultation on the contents of the Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow. Other comments, including those of a supportive nature, those correcting minor spelling or grammatical errors, those outside of the scope of the draft Specification and/or those not requiring a response have not been included for the sake of brevity. However, all comments submitted are included verbatim in the table at Annex B with their corresponding response.

A significant number of stakeholder comments relate to Section 3.3.2 of the Specification. As a result, Section 6 of this document provides an indication of the foreseen amendments in line with the detailed responses provided in Annex B.

2.2. Withdrawal of Code 888

Comment

Several stakeholders pointed out that the draft Specification mandates the use of code 888 in addition to codes 999/ZZZ and that this presents no benefit.

Response

It is acknowledged that the use of code 888 is mandated through the description of ODI RDLY and complemented by supporting notes in Section 3.3.2. It is agreed that further work on the use of this code is required before introducing it into the Specification. As a result, it is agreed to remove all references to code 888 in the Specification. See detailed reponse to comment #12.

2.3. Clarification on the Use of Code 000

Comment

Several stakeholders pointed out that the draft Specification mandates the use of code 000 for “technical reasons” which creates confusion with code ZZZ and that this presents no benefit.

Response

It is acknowledged that the use of code 000 is wrongly mandated through the description of ODI RDLY. It is agreed that the purpose of code 000 is not to substitute code ZZZ. It may be used temporarily (in coordination with PRU) for reporting entities that are not capable of fully processing delay information as part of the regular reporting. Code 000 will remain as an optional value for DLY1 in ODI RDLY and the notes of section 3.3.2 will reflect this change. See detailed reponse to comment #13.

2.4. Clarification on the Reported Delay Durations

Comment

Several stakeholders requested clarifications on issues with regard to the delay durations to be reported. Namely in cases when there is a difference between the sum of the reported delay durations and the calculated delay, the correct ordering of multiple delays and exceptional cases of more than five delay causes.

Response

The possible difference in calculated delays by airline operators and airport operators is acknowledged. 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 airline operator. In cases of delay, at least one delay cause and its duration is to be reported. Optionally, up to five multiple delay causes and durations can be reported without any specific ordering requirement. However, it is only when the sum of the delay durations is less than the calculated delay that code ZZZ can be used to report the time difference between those two values. See detailed responses to comments #11 and #17.

2.5. Clarification on the Non-Conformance Handling

Comment

One stakeholder commented that there was lack of clarity as to when reporting entities were notified of the rejection of submitted data files and the conditions triggering escalation procedures by EUROCONTROL PRU.

Response

It is agreed to clarify APDF-NCH-010-M, APDF-NCH-020-M, APDF-NCH-030-M and APDF-NCH-040-R indicating that the online submission tool notifies the reporting entity during data file submission (see response to comment #34 for the intended rewording of section 2.4 of the Specification). It is also agreed to clarify APDF-NCH-050-M and APDF-NCH-060-M indicating that EUROCONTROL PRU only initiates escalation when there is persistent non-conformances, the absence of a remedial action plan and after expert assessment of the underlying issues faced by the reporting entity (see response to comment #35).

2.6. Clarification on the use of Sub-Codes

Comment

Several stakeholders commented on the use of sub-codes.

Response

It is agreed to clarify that the use of sub-codes is optional for ODI RDLY and ODI RCNL. However these must comply to IATA codes detailed in Annex B of the Specification. See responses to comments #21, #28 and #31.

2.7. Clarification on the time value for ATOC

Comment

Several stakeholders commented that there are cases where they are unaware of the actual time air transport operators cancelled a given flight.

Response

It is agreed that the actual time of cancellation may not be communicated to the reporting entity; for such cases the Specification will clarify that the reporting entity is to insert the time of entry into the airport system. See response to comment #15.

2.8. Editorial Changes

Comment

Several stakeholders provided minor editorial and scope comments. They also commented that the IATA codes of Annex A and B need to be aligned with Edition 38.

Response

The editorial comments have been addressed (see Annex B). In addition EUROCONTROL noted that the Specification should refer to EUROCONTROL or EUROCONTROL PRU instead of CODA and PRU.

3. Intended Amendments to Section 3.3.2 of the Specification

As the majority of comments referred to Section 3.3.2 of the Specification, the below extract reflects the intended amendments to that section of the Specification.

*APDF-RFS-220-M Operated departure flights are considered delayed if the delay threshold is breached, i.e. $AOBT \geq STD + 00:04:00$ (240 seconds). In such cases, the corresponding flight records **shall** include at least one delay cause (i.e. DLY1) and the associated delay duration (i.e. TIME1).*

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.

Notes for requirements APDF-RFS-220-M to APDF-RFS-240-M (refer to ODIs RDLY and TIME in Section 5):

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 respective DLYn value for ODI RDLY.

2) 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). 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).

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).

ANNEXES

ANNEX A

Annex A contains a list of those Stakeholders that provided comments on the Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow formal consultation.

ANNEX B

Annex B provides a table containing all the comments provided by Stakeholders. The table shows the 'Disposal' of each comment, i.e. 'Accepted', 'Partially Accepted', 'Rejected' or 'Noted' and EUROCONTROL response to each comment.

ANNEX A

LIST OF STAKEHOLDERS THAT PROVIDED COMMENTS TO THE FORMAL CONSULTATION

The stakeholders who provided comments on the Draft EUROCONTROL Specification for Operational ANS Performance Monitoring - Airport Operator Data Flow are listed below:

Country	Organisation	Contact Name
FRANCE	AÉROPORT DE PARIS GROUP	SAMIEZ Benoit
POLAND	PANSA	BANASZEK Krzysztof
GERMANY	AIRPORT DUSSELDORF (APT/DUS)	MAGSUMBOL Nicole
PORTUGAL	NAV PORTUGAL	PIRES Isabel megre
DENMARK	CAA Denmark	Remmer Niels
ROMANIA	ROMATSA R.A.	CIMPUIERU Valentin
GERMANY	MUNICH AIRPORT INTERNATIONAL (APT/MUC)	KIRMAIER Irene
LUXEMBOURG	ANA Luxembourg	CLORI Claudio
GERMANY	FRAPORT AG (APT/FRA)	BECKMANN Matthias
SWITZERLAND	ZURICH AIRPORT LTD.	STOCKER Maurus

This table does not list the four stakeholders who provided a response and requested to remain anonymous. Annex B includes the detailed comments that were only submitted by three of them and are recorded as Stakeholder #1, Stakeholder #2 and Stakeholder #3.