

## A6 Alliance position on the report of the Wise Person Group

### Introduction

The A6 Alliance considers the WPG report as an additional view to evolve the SES framework in order to address challenges faced today and those we can anticipate for the future.

We welcome the areas for improvement identified in the WPG report. However, the A6 Alliance believes that it is crucial to establish a common understanding among all the stakeholders on a common vision for the future, prior to exploring and assessing detailed solutions. The A6 Alliance, and responsible for more than 70% of the investment and its improvement, stands ready to make suggestions for further points that need regulatory and political attention.

The A6 Alliance is heavily involved in the technical and operational issues of SES implementation. Therefore, we would like to urge the EC to focus on continual and stronger engagement with the operational stakeholders in defining the future vision for European ATM. Regarding the implementation of the AAS, the A6 Alliance would like and is ready to contribute to the development of a realistic and robust transition plan, based on mature and validated concepts, to create the Seamless European Airspace System as described in the AAS.

### A network-centric approach

The A6 Alliance supports a shift to a more network-oriented (i.e. rather than network-centric) approach for managing Europe's ATM network, with a reinforced and effective CDM process and governance. Therefore, roles and responsibilities must be clearly defined, preventing duplications and overlaps and taking into account where accountabilities and liabilities lie.

It is vital that the ANSPs are not micromanaged. Each operational stakeholder has the accountability for its segment of service provision and has to retain the managerial autonomy for how it achieves its performance targets.

Better network performance can only be successfully achieved through improved and fair co-operation amongst operational stakeholders. This cannot be achieved if decisions are taken unilaterally without taking into account different accountabilities.

The A6 Alliance supports the need to establish an optimum airspace design for Europe as recommended by the SJU study on a Seamless European Airspace System. The A6 Alliance welcomes the role of the NM in directing traffic flows to balance capacity made available across the network (as enabled in the NF IR), based on decisions supported by an effective Collaborative Decision Making (CDM) process involving all operational stakeholders like ANSPs, Airspace Users, and Airports.

Any move towards a contractual capacity-based model for ATM raises difficulties and therefore necessitates an active discussion including strong and open involvement of all operational stakeholders in order to assess the risks and opportunities of such an approach as well as look beyond the current network capacity management mechanisms that solely saturate capacities distributed currently across the network. Capacity contracts with ANSPs would need to take into account the interdependencies amongst KPAs and thus be aligned with the SES performance framework. Those considerations would have to take into account the inherent lack of flexibility and limited margin of manoeuvre due to the investment and competence-building cycle required to support technical and human resource developments, incl. consultation, negotiation, legal reviews, etc. Likewise, new service provision models resulting from new concepts of operations such as flight-centric ATC need to be taken into account in order to assess if such an approach is consistent or optimal for future concepts of operation.

Perhaps most critically, the successful deployment and modernisation of European ATM requires the buy-in of all operational stakeholders, particularly those who are responsible for investing in and deploying the required ATM infrastructure. In adopting a more network-oriented approach to ATM, it is essential that we retain strong engagement from all ATM stakeholders. To that end, whatever form and scope a deployment or infrastructure manager might take in the future, it is essential that industry has a core role to play not only in its formal governance, but also in its actual functioning (definition, planning and execution), including proper consultation mechanisms such as the existing SDM Stakeholder Consultation Platform.

As the scope of the future Infrastructure Manager as per the WPG report is unclear, this concept cannot be supported.

### **Implementation of a Digital European Sky (DES)**

The A6 Alliance supports the outcome of the Airspace Architecture Study (AAS) and welcomes the creation of the Seamless European Airspace System as the major result of the Study.

Facilitating the Digital European Sky, the A6 Alliance supports the proposal of the Airspace Architecture Study to implement voluntarily – well supported by business cases – market driven ATM Data Service Providers (ADSPs). It is further supported that in order to facilitate interoperability, ADSPs shall be certified and supervised on a European level, preferably by EASA. The concept should be developed further and undertake a split and a differential implementation of roles:

- ADSPs delivering ATM data processing and integration services should be provided under market conditions and are key in the provision of virtual centre services.
- ADSPs focused on data generation such as, but not necessarily limited to, surveillance and navigation sensor services and ground communication transmitter and receiver services.

As well as creating a digital foundation for conventional ATM, we also need to ensure the Digital European Sky is developed with new airspace users in mind, particularly unmanned aircraft operators. ANSPs will have a fundamental role to play in delivering U-space in Europe. ANSPs are best placed to provide a number of core U-space services critical to its success, whilst ensuring their safe integration with ATM.

In order to achieve a Seamless European Airspace System, the Transition Plan needs to be based only on mature and validated concepts, ensuring that deployment plans are based on realistic timeframes. It should also take into account the deployment capabilities of all affected operational stakeholders and the associated impact on the performance and charging regulatory framework. In addition, in order to secure continuity and coherence, the A6 Alliance recommends continuing to use all the institutional functions under the current framework.

The SES Digital Backbone (SDB), proposed by the A6 Alliance and EUROCONTROL and governed through the SES Shared Services Alliance (3SA) of operational stakeholders is the instrument of choice to manage the implementation of the Digital European Sky. The 3SA-SDB can ensure the required buy-in of operational stakeholders, while respecting their accountability and responsibility in the service provision. An orderly implementation of the Digital European Sky needs to build on a federated approach based on fair and reinforced co-operation.

### **Evolving role for people delivering the ATM services**

The A6 Alliance recognises that the future role and competences of air traffic controllers (ATCOs) and other ATM staff will evolve with technology

The A6 Alliance supports the establishment of a licensing scheme that keeps pace with procedures, airspace and systems development. An improved and flexible licencing scheme will ensure the desired scalability of airspace capacity.

The A6 Alliance also supports harmonised ATCO training based primarily towards tools and tasks as a precondition for such evolution.

### **Simplifying the regulatory framework**

The regulatory framework needs to:

- refine the performance metrics (i.e. KPI) against which we are measured as well as to take into consideration the interdependency amongst KPAs and,
- continuously incentivise the accelerated deployment of new technologies that will help increase flexible and scalable provision of capacity. As a principle, such incentives should represent true incentives for early movers, and not be purely transferred to the customers.

In any future environment there should be clear separation between roles and accountabilities of regulatory functions and service provision, as per SES current principles.

It is critical that the principles of performance-based regulation are maintained in any new regulatory framework.

A market-driven approach should be pursued where it is beneficial and supported by positive business cases. It requires fundamental organisational changes.

Simplifying the regulatory framework should not be equated with a need to centralise it. Economic regulation needs to take into account local specificities (“one size does not fit all”), avoiding duplication with respect to the National regulatory bodies, as well as not adding bureaucracy and unnecessary costs. NSAs tend to have a better knowledge and understanding of local conditions that influence cost, performance, etc. that can ensure better and more effective economic regulation.

The A6 Alliance does not see any evidence of benefits and practicalities from establishing a common route charge over a Seamless European Upper Airspace System.



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