



Association of European Airlines



Final IATA/AEA JURG Position on the LINK2000+ Mandate

(Proposed Rule version : 1_09d)

(IATA/AEA version 16 July 2004)

Introduction

1. The objective of the Eurocontrol LINK2000+ Program is to plan and coordinate the implementation of operational air/ground data link services (CPDLC) over ATN for Air Traffic Management (ATM) in the core area of Europe in the timeframe 2000 – 2010.

Link2000 is aimed at reducing controller workload and consequently increase sector capacity. Simulations show that 11 % more sector capacity can be expected if 75% of all aircraft in a given sector is equipped. This will reduce delays and increase sector productivity. The program consists of a three-step approach: 1) pioneer airlines, 2) incentives and 3) an eventual mandate.

2. In this context, Eurocontrol is currently working on a European Notice of Proposed Rulemaking (ENPRM) for a mandate, planned to be issued in 2004.

AEA/IATA, through the CNS Joint User Requirements Group (JURG), have been working on a position on the proposed Rule.

Position

3. Based on traffic forecast studies, traffic density and the consequent demand for ATC en route capacity will continue to increase. It is our belief that this demand can be accommodated with a combination of traditional methods together with the introduction of new CNS/ATM functions that serve as capacity enablers that maybe required.
4. IATA/AEA support a mandate for CPDLC over ATN/VDLM2 for new aircraft per 31 March 2009 to obtain maximum benefits as early as possible.
5. IATA/AEA agree only on a mandate for CPDLC over ATN/VDLM2 for retrofit aircraft per 31 March 2014, provided that respectively some relevant issues and requirements (as reflected in **Appendix I and II**)
 - i. are properly addressed to our satisfaction
 - ii. are taken into account in the text of the Rule,and that the issues mentioned under par. 7 and 8 are ensured.
6. A blanket endorsement of a mandated retrofit will most likely confront airlines with high and unreasonable retrofit costs imposed by the industry and will undoubtedly lead to deferment of investments towards the end of the mandate period and consequently will have a negative impact on ATC capacity during the 8 year period for airline retrofits.
7. Therefore it must be ensured that an incentivised retrofit scheme is implemented, that is closely aligned with the 8 year heavy maintenance schedule and must put pressure on aircraft manufacturers and VDLM2 equipment vendors to lower the cost of ATN/VDLM2 embodiment.
8. It must be ensured that an incentivised retrofit scheme is implemented, that is not limited to an equipage percentage of 25 % and that is effectively aligned with the increased efficiency and cost savings in the air navigation service providers operations. In no way the non-equipped aircraft should be burdened with higher charges to compensate the lower charges for the equipped aircraft.

APPENDIX I : Relevant issues that need to be properly addressed to IATA/AEA's satisfaction

I.1 Eurocontrol shall demonstrate :

- a. the impact of LINK2000+ implementation relative to other functions/applications to be implemented.
- b. the extension of the geographic coverage area as a scenario, including the impact of some ECAC States not able to join the program.
- c. that the full cost of the aircraft installation is included in the Business Case and that this can be assessed against the committed capacity enhancement.
- d. that the efficiency improvements with the air navigation service providers operations is closely monitored and that this information be made available to IATA/AEA.
- e. that the ANSPs compliance will be monitored and tracked on a centre specific basis, (including integration into ATS platforms), and to make this info available to IATA/AEA.

I.2 Refers to Article 2 : GENERAL REQUIREMENTS

A stable and committed base line airborne and ground data-link capability specification shall be in place prior to publication of the Rule.

I.3 Refers to Article 4: AIRCRAFT OPERATORS

- Sub 4:

IATA/AEA supports the action by Eurocontrol to seek an agreed position with JAA States to file a difference from the ICAO data link recording standard for retrofit aircraft. In addition we recommend JAA States to have a concerted effort with the FAA to urge ICAO to amend its Annex Standard.

I.4 Refers to Article 6: EXEMPTIONS

- Sub 4:

There should be no need to apply for exemptions when data link systems are unserviceable. Eurocontrol is requested to convince States to endorse a common JAA Minimum Equipment List (MEL) policy with say a 10 day repair period and a requirement to annotate the Flight Plan as data link not available.

APPENDIX II : IATA/AEA requirements that need to be taken into account in the text of the Rule

II.1 Refers to Article 1: OBJECTIVE AND SCOPE

- Sub 3b: ANNEX II - AIRSPACE

- Include

The FIRs and UIRs that respond to the need to gain real benefit, i.e. at least the core area of Europe, including States at the perimeter conjunct with Trans Atlantic airspace.

- Sub 4: FANS 1/A functionality

- The FANS aircraft exemption paragraph should be changed to read:

The Rule shall not apply to:

a. Aircraft capable of utilising FANS 1/A functionality without operational restrictions.

- Include:

Data link messages to/from FANS 1/A aircraft should be accommodated by all ANSPs providing CPDLC over ATN/VDLM2 through the ground infrastructure (com gateway) and not through cockpit procedures and without additional costs.

- Include:

The airlines shall have a freedom of choice for communication service provider (i.e. interoperability)

- Include:

ATC communication charges, i.e. that does not include any AOC via VDLM2 shall be borne by the ANSPs.

II.2 Refers to Article 3: AIR NAVIGATION SERVICE PROVIDERS

- Include:

Measures need to be in place to ensure that the full capability and coverage of the ATS systems is operationally available and that technical personnel is trained and available as well.

II.3 Refers to Article 5: ATC PROCEDURES

- Include:

A reference to the overall Safety Case in ENPRM (Level C software)

II.4 Refers to Article 6: EXEMPTIONS

- Appropriate arrangements need to be made for those aircraft that cannot be economically equipped and limited to reasonable numbers

II.5 Refers to Article 7: ENTRY INTO FORCE AND IMPLEMENTATION

- Sub 2b ii & iii : Dates for forward/retrofit

- The timing for forward fit (2010) is not acceptable and need to be 2009. The timing for retrofit should be not before 2014 (iso 2012).