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By e-mail: [patrick.ky@easa.europa.eu](mailto:patrick.ky@easa.europa.eu)

Brussels, 24 July 2017

Dear Director,  
Dear Patrick,

Re: RMT. 0624 Remote tower operations

As you know, ETF and ATCEUC are the only two recognised EU social partners representing staff in the air traffic management industry. Therefore, we represent tens of thousands working in Europe within ANS provision, including around 17,000 active air traffic control officers.

Following the letter we sent to you on April 7<sup>th</sup>, we met with the Head of ATM regulation and two other EASA officers on June 28<sup>th</sup>.

While this meeting was conducted in a professional spirit, it was not sufficient in finding what we deem an appropriate solution to allay our concerns about the approach taken by the Agency to tackle remote tower operations (RTO).

In phase 1 of the Rulemaking group, a single aerodrome with “low density” traffic (a definition not yet stated in EASA documents) was the size of operation applicable to the work, and this was established as a safeguard. This safeguard no longer exists in the intended document for phase 2 of RMT.0624.

For our organisations and the people whom represent, RTO are considered a huge driver for change in ANS provision but at the same time they can be a driver for unfair competition, enabling offshoring in aerodrome air traffic control, and can facilitate social dumping. Recent events in Scotland strengthen this notion.

We strongly believe that an amendment of EU Reg 2015/340 (ATCO Licensing) is required with the inclusion of a “rating endorsement” for ADI and ADV ratings to cover RTO. This would have the following benefits:

- Identification of commonalities in the aerodrome control service provision using RTO.
- Mitigation of risks associated with RTO through appropriate training measures to raise the awareness to operators about the difficulties associated with this technology.
- Clarification of which ATCOs are entitled to undergo unit training in view of providing aerodrome control service using RTO.
- The granting of mutual recognition throughout the EU of this status.
- Help in achieving and maintaining a high level of safety within the task with a minimum level of safety oversight being provided through a common core content

The idea that commonalities do not exist to establish a common core content is a defence made by some stakeholders, a reasoning that if applied to the existing provisions (which were established fairly recently), it would lead to the complete deletion of all ratings and rating endorsements, something which is not requested by anybody at the moment. Indeed, the idea that it is difficult to find commonalities between two differently-sized/differently-operated aerodromes, or aerodromes that are differently complex using remote towers could also be applied to there being a difficulty in finding commonalities for the same ADI/ADV 'standard visual tower' training and common core content for those aerodromes in the first place, and yet this provision currently exists.

The suggestion that RTO is simply the provision of the same service using a new technology and that therefore no adaptation to the regulatory framework is required is not evidenced. When a change is introduced the demonstration that no adaptation is needed has to be proved by the entity introducing the change while our organisations are asked to prove the need for changes which is reverting the process, this is not acceptable. Both our organisations maintain that a change from controlling an aerodrome from a visual tower to controlling it remotely is a monumental shift in how we carry out the privileges of our licence, so monumental it is that AMC/GM/guidelines are considered insufficient to tackle the problems it will introduce.

There is also a suggestion that RTO can imply multiple aerodromes serviced by the same ATCO simultaneously. This suggestion leads to different problems including a concern for safety, as would flying more than one aircraft simultaneously by the same pilot.

Finally, the justification provided to reject our proposal, that our view being in a minority shall not therefore be considered in contrast to more resounding claims by organisations representing an apparent majority in the ATM industry is not acceptable. Indeed we are concerned that the decision not to forge ahead with a rating endorsement for RTO is perhaps a political decision that puts manufacturers', ANSPs' and NSAs' own interests ahead of the interests of European aviation safety.

Our organisation also mentioned other concerns such as (and not limited to):

- The multiple mode of RTO needs stringent regulation as the SESAR trials held in Ireland suggests that to be safely applicable to medium density airports it would require a new sequencing tool that does not exist and for which no plans for developments have been publicised.
- Cross-border service provision-related issues such as demarcation of authority as it is the enabler for cross-border aerodrome air traffic services provision.

The growing sentiment we are experiencing is that when tackling RTO, EASA is bowing down to system manufacturers' and air navigation service providers' lobbying. We believe the role of the regulator is to set the appropriate limitations to ensure that air travel remains as safe as possible when the mandate given to RMT.0624 does not cater for that.

We acknowledge that given the timeline for RMT.0624, it is virtually impossible to accommodate the document with our proposals but we would like to stress that for us to be able to continue to support your agency's initiative around remote tower operations, we need to get appropriate consideration.

We can propose, for example, to task the group to be formed to review the common core content and other training requirements with establishing the training syllabus for a rating endorsement to be included in a general review process for ATCO licensing requirements. For those reasons, we would like to have a meeting with you, on the topic, before the next RMG meeting planned for September 5<sup>th</sup>, to discuss our concerns and our proposal.

Thanking you in advance,

Yours sincerely,



Volker DICK  
ATCEUC President



Charles-André QUESNEL  
ETF ATM Committee Chair