

Danube FAB position paper on the Wise Persons Group (WPG) Report recommendations

DANUBE FAB understands that the current ATM is under great pressure at present and therefore there is a need for further improvement of the Single European Sky. We recognise the roles of all industry stakeholders, States and FABs towards achieving a futureproof vision for the Single European Sky. We would welcome the application of a total system approach to European aviation with well-defined objectives, realistic expectations and pragmatic timelines ensuring commitment and involvement of all actors.

Recommendation 1: Strengthen the Network Manager (NM) role

The Member States in the EU have their SES related roles and accountabilities both in their national and EU-wide environments. The Member States' decisions will always target the good of the travelling public and the sustainability and safety of air transport. To achieve those objectives Member States possess the decision-making powers within their sovereign airspace and share considerable joint responsibilities in the EU mechanisms.

A strengthened network-centric approach must be supported by enhanced CDM processes to ensure the appropriate balance of opinions.

Granting executive powers to the NM with the proposed roles of an Airspace Manager, a Capacity Manager and an Infrastructure Manager, as described in the WPG Report, may involve risks of situations where Member States' ability to act is jeopardised. Any new executive powers should not generate an overlap between the regulatory and service provision roles of the NM.

The Capacity Management function potentially gives the NM greater (regulatory) privileges, thus leading to a diminished role of the NSAs. The proposed yearly capacity contracts with ANSPs may circumnavigate the role of the Members States where strict safety accountabilities lie.

Any initiatives that would be locally sub-optimal shall be thoroughly examined. The Airspace, Capacity and Infrastructure Management must be founded on appropriate accountabilities for the NM vis-à-vis local actors (States, NSAs, ANSPs).

DANUBE FAB recognises the importance of the Network Manager (NM) role and the common efforts needed to ensure sufficient capacity in the Single European Sky. We would like to reiterate our commitment towards achieving the SES performance goals, in line with our responsibilities as per the airspace regulation. We are

committed to manage the capacity at local level having the tools and view on the local situation.

Recommendations 2, 3 & 4: Implement a Digital European Sky based on the Airspace Architecture Study with a new market for ATM data service providers and fully integrated airports into the network

DANUBE FAB believes that the Airspace Architecture Study should have also considered the TMAs and the Airports as significant contributors towards achieving network capacity. Looking only at the en-route airspace might create additional pressure on the remaining airspace and the airport infrastructure.

The AAS shall be further scrutinized vs any potential EU-wide monopolisation of the ANS provision such as data services provision. The ANS provision responsibility distribution among different actors should be clarified vs the provisions of the Chicago Convention while fully acknowledging the human factor and safety critical aspects.

The added value of FABs should be recognized. Moreover, FABs are presently the only formalised working partnerships with key representation from States, Military Authorities, NSAs and their operational stakeholders. FABs are naturally placed to further develop their operational excellence programs, taking the lead in implementing solutions driving the network performance.

Recommendation 5: Use the performance and charging scheme to support the digitalisation of air traffic services, and public funding to support deployment only where necessary from a network perspective.

DANUBE FAB welcomes the use of financial incentives to support the timely deployment of ANS enhancements, provided that the incentives remain outcome- and performance-based and that they address the risks that ANSPs can genuinely control. Any possible future incentives related to public funds need to reflect the RP3 performance scheme and plans in place to avoid any disruption in the system and to constitute real incentives, where possible benefits stay with the corresponding stakeholders.

Recommendation 6: The ATCOs role in the Digital European Sky

The essential role of ATCOs is and shall remain in the future to ensure safe and efficient operations. It shall be backed up with mature and reliable technologies with adequate level of automation.

Recommendation 7: Simplified and strengthened economic regulation relying on a market-driven approach

A streamlined economic regulatory framework is needed from RP4, allowing autonomy and positive incentives to perform well.

Given the resolve of climate change and the environmental challenges we are faced with today, the interdependence between the capacity target and the environmental target should be taken into consideration.

The market driven approach should be applied based on a meticulous evaluation of the local benefits and driven by local factors supported by positive business cases where the States have their final say.

Recommendation 8: Establish a strong, independent and technically competent economic regulator at European level.

DANUBE FAB supports the European Commission efforts to ensure a proper recognition of indigenous requirements and customer needs as implemented in the current performance scheme. The States and their Competent Authorities, supported by the current independent and technically competent PRB and PRU, have abundant knowledge and understanding of the local conditions which are vital for a better economic regulation.

Recommendation 9: Seamless European (Upper) Airspace System with a common route charge

As mentioned above, DANUBE FAB believes that all local factors which impact the provision of safety and capacity, including regulatory, operational and administrative, as well as the airspace users, should be taken into consideration. This would safeguard the SES performance goals. Therefore, the creation of a common route charge should be prudently examined vs the potential benefits and risks.

Recommendation 10: Tower services on a market-based principle

DANUBE FAB believes that States shall have their decisions based on positive business cases considering all local circumstances and airspace users' needs.