The Guild of Air Traffic Control Officers

GATCO Response to CAP1132 Approach to TANS regulation in RP2

1.0   GATCO.

GATCO is widely involved in many UK and international activities and discussion groups that influence air traffic management. These activities fall into two categories: 'technical and operations' and 'professional and legal'. GATCO is part of the wider international organisation, IFATCA. IFATCA is a global air traffic controllers association. IFATCA has a strong relationship with ICAO where we have a permanent observer member status in the ANC and where we work with the ANB.

2.0   Comments regarding the Capita Benchmarking study.

2.1   Whilst the logic behind the decision to withhold commercially sensitive information to both protect the incumbent ANSP and to avoid the 'race to the bottom' is recognised, disclosure of some information should be made to allow for competition to be developed and avoid potential competitors from offering unsuitable tenders.

2.2   It is difficult to comment meaningfully on a study as heavily redacted as this one.

3.0   Comments regarding KPIs.

3.1   When calculating Environment Performance Indicators and Capacity Performance indicators (Appendix A1), consideration should be given to airport and airspace structural delays. Examples include but are not limited to:

- Extra taxi time required by temporary work in progress
- Stand design and placement causing pushback delays with multiple aircraft [1]
- Aircraft with technical snags that require company intervention before taxi
- Stand allocation for inbounds causing a knock-on delay to outbounds
- Non standard flights can increase airborne holding, complexity and delay[2] Few UK airports are able to provide a direct line transit from the edge of a 40nm cylinder to the runway threshold.

4.0   Comments regarding Cost efficiency.

4.1   In determining unit cost and cost efficiency of a TANS provider it is important to take account the tasks performed. Often it is more than just a final approach service; for example, Luton Approach providers a service to aircraft joining,

leaving and transiting controlled airspace as well as to aircraft inbound to and outbound from Luton Airport. These extra tasks add complexity and workload for the controller and therefore increase staffing costs for the ANSP.

4.2   Some TANS providers also provide a service to more than one airfield per TMA, for example Essex Radar (nominally Stansted Approach) serves aircraft inbound to Stansted, Luton and Cambridge, as well as several other minor airfields. The integration of VFR (non-charged) traffic into the traffic pattern can also increase complexity, as can unfavourable weather conditions.

4.3   With all of these factors taken into account, it becomes clear that cost efficiency is not as simple as 'contract cost/IFR movements'

5.0   **Comments associated with the NATS Draft Business Plan for the Provision of TANS.**

5.1   GATCO has valid concerns regarding certain aspects of NATS' NSL draft business plan. We also welcome many aspects of their vision for the future, through optimisation of airspace design leading to continuous vertical trajectories, enhanced queue management which all contribute to increased capacity and a reduced ATM carbon footprint. GATCO as part of IFATCA are working towards these goals in our work within various technical SESAR projects. Our concerns however, fundamentally lie around the insistence that increased automation will reduce the requirement for operational staff, their costs and whilst increasing capacity and safety[3].

5.2   It should be noted that the research provided by "Capita" shows that staffing costs are not the most important costs incurred by this ANSP[4&5], however NSL state that these are the most important to reduce.

5.3   NSL insist that automation will increase safety and reduce "human errors"[6]. It must be stressed that although safety nets reduce risk, these are always tailored to an individual airport and that individual airport's structure. Whilst the system design may be similar, the application of each system is unique to the operational environment. "Human error", (an archaic concept in any aviation incident investigation) can be dramatically increased through reliance on automation as has been demonstrated in several recent aircraft accidents; notably Air France 447 and Asiana 214. This is repeatedly interpreted by our members as a "deskilling" of the ATCO profession. It should be noted separately, that as automation increases, so does the associated training. Increased training requirements will directly augment the number of staff required to lead in the education of the workforce.

5.4   Automation and information technology can themselves lead to failures as was demonstrated in the pre-holiday season issues with the NERL telephone software.

5.5   GATCO is unaware of NATS' current remote "virtual tower" operations (apart from the contingency facility at Heathrow) and their current ability to

reduce costs[7]. We are fully aware, however of this technology highlighted by our sister associations within IFATCA.

5.6   It could also be argued that the form of systems integration[8] proposed in the draft business plan is contradictory to the current concept of the decentralisation of services favoured by the European Commission and the draft legislation associated within SES2+.

5.7   We agree with NATS' concern regarding the complexity of overall delays as is highlighted earlier in this document (para. 3.0). Using a simple taxonomy based around taxi time (amongst others) is over simplification and misinforms.

6.0   Comments on Next Steps.

6.1   GATCO is of the opinion that it is undesirable to create lower prices and increased capacity as two separate goals. Attempts to do so risk lowering safety standards by reducing staffing levels and increasing controller hours, workload, and fatigue. As cost efficiency can be seen as contract cost / IFR movements, then increased efficiency (e.g. more aircraft through airspace through, for example, closer spacing on final approach, improved controller tools, traffic increases) would drive down the unit cost anyway whilst maintaining staff numbers.

1) CAP1132 Approach to TANS regulation in RP2; Appendix A1, environment, a.i

2) CAP1132 Approach to TANS regulation in RP2; Appendix A1, environment, b.i

3) NSL draft business plan; page 26, 4.4 'Leveraging technology enabled solutions – to reduce headcount, increase productivity, achieve economies of scale, and improve service resilience…'

4) Capita UK TANS Benchmarking, page 23 fig. 13.

5) NSL draft business plan; page 39, 5.5 'Examples of these are radar and data feeds, communication circuit costs, and insurance cost…'

6) NSL draft business plan; page 26, 4.4 'Systems Integration- to deliver further automation which minimises or removes human intervention thereby reducing staff costs, minimising human errors and increasing capacity…'

7) NSL draft business plan; page 26, 4.4 'Leveraging technology enabled solutions…utilising our remote "virtual tower" operations…'

8) NSL draft business plan; page 26, 4.4, beginning 'Systems integration...'