

Arbetsgruppsmöte AFIS/CN

2019-03-04-05

Agenda

Arbetsgruppsmöte AFIS/CN	
4 mars	
12:00-12:30	Allmän information
12:30-13:00	Information runt bordet om status på implementeringsarbetet
13:00-13:30	Tidsplan
13:30-14:00	Begränsade certifikat samt ev nationella krav
14:00-14:20	Fikapaus
14.20-16:00	Changes och changes functional systems
16:00-16:30	Summering
5 mars	
08:30-09:00	Reflektioner från gårdagen
09:00-10:30	Part-Pers och ATSEP
10:45-11:30	Summering

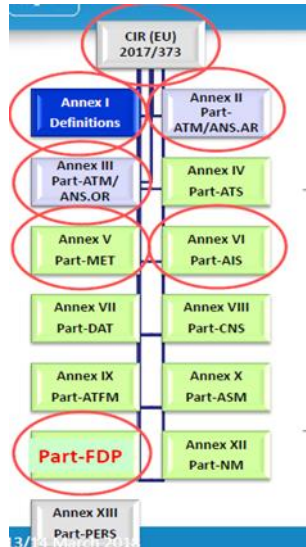
Era frågor

- Vad innebär det att SMS inte längre omfattar CN(S).
- Berörs vi av DEL-DAT och Del-ATFM samt krävs certifikat?
- Vet vi redan nu vilka nationella krav TS kommer att ha

Allmän information

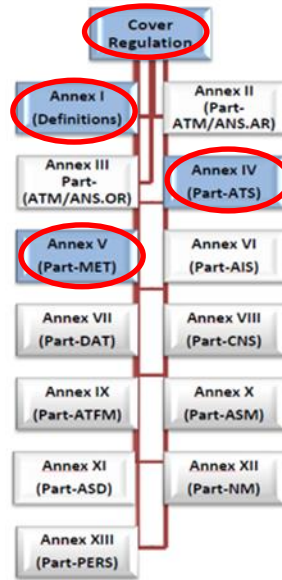
Status 373 dokument

Opinion 2



139/2014

Opinion 3



SERA

5

Opinion 2

Implementerade 2/1 2020

(FPD/ASD 2022)

Decision ca Q1 2019

Opinion 3

Implementerade jan 2022 Decision ca

Q1 2019

Annat på gång:

- Nya BR (2018/1139)
- AMC/GM funktionella system – Decision Q3 2019
- Part-MET kommer uppdateras Q3 2019 (amd 78)
- Samt Part-pers (ATSEP) Q3 2019

Nationella föreskriftsprojekt 373

- Uppstartade projekt
 - ATS föreskriften (TSFS 2016:34)
 - AIS föreskriften (TSFS 2015:50)
 - MET föreskriften (TSFS 2017:86)
 - Ny överordnad föreskrift med ev nationella krav
 - Teknisk personal som utför drift och underhåll av utrustning för ATS, ATFM samt CNS (TSFS 2007:11)

Nationella föreskriftsprojekt 373

- På gång
 - CNS föreskriften (TSFS 2016:18)

Svar era frågor

För CN(S) provider

- Tillämpliga delar av 373 (förutom IR samt annex I)
 - Annex III Part- ATM/ANS.OR (A,B,C,D) i utgångspunkt
 - Annex VIII Part-CNS
 - Annex XIII Part-Pers (ATSEP)
- I dessa finns enbart krav på Ledningssystem (ATM/ANS.OR.B.005)



Inga SMS krav

Tillämpliga delar för olika tjänster enl 373

	Annex III (Part-ATM/ANS.OR)				Annex IV (Part-ATS)	Annex V (Part-MET)	Annex VI (Part-AIS)	Annex VII (Part-DAT)	Annex VIII (Part-CNS)	Annex IX (Part-ATFM)	Annex X (Part-ASM)	Annex XI (Part-ASD)	Annex XII (Part-NM)	Annex XIII (Part-PERS)
	Subpart A	Subpart B	Subpart C	Subpart D										
Air traffic services (see Note 1)	X	X		X	X									
Meteorological services	X	X	X	X		X								
Aeronautical information services	X	X	X	X			X							
Data services	X	X	X					X						
Communication, navigation and surveillance service	X	X	X	X					X					
Air traffic flow management service	X	X	X	X						X				
Airspace management service	X	X	X								X			
Airspace design service	X	X	X									tbd*		
Network Manager	X	X	X	X									X	
service providers (see Note 2)														X

Table 1: Applicability of annexes to service providers

Part-DAT samt Part-ATFM

- Part-DAT – ingen i SE som ska certifieras. Denna typ av leverantörer finns ej här
- Part-ATFM – här omfattas LFV av certifiering, då de utför level 3 tjänst. Dock bidrar alla ATS-leverantörer med input till level 3 men certifikat behövs inte för dessa delarna då "produkten" görs av LFV.

- Hemsidan

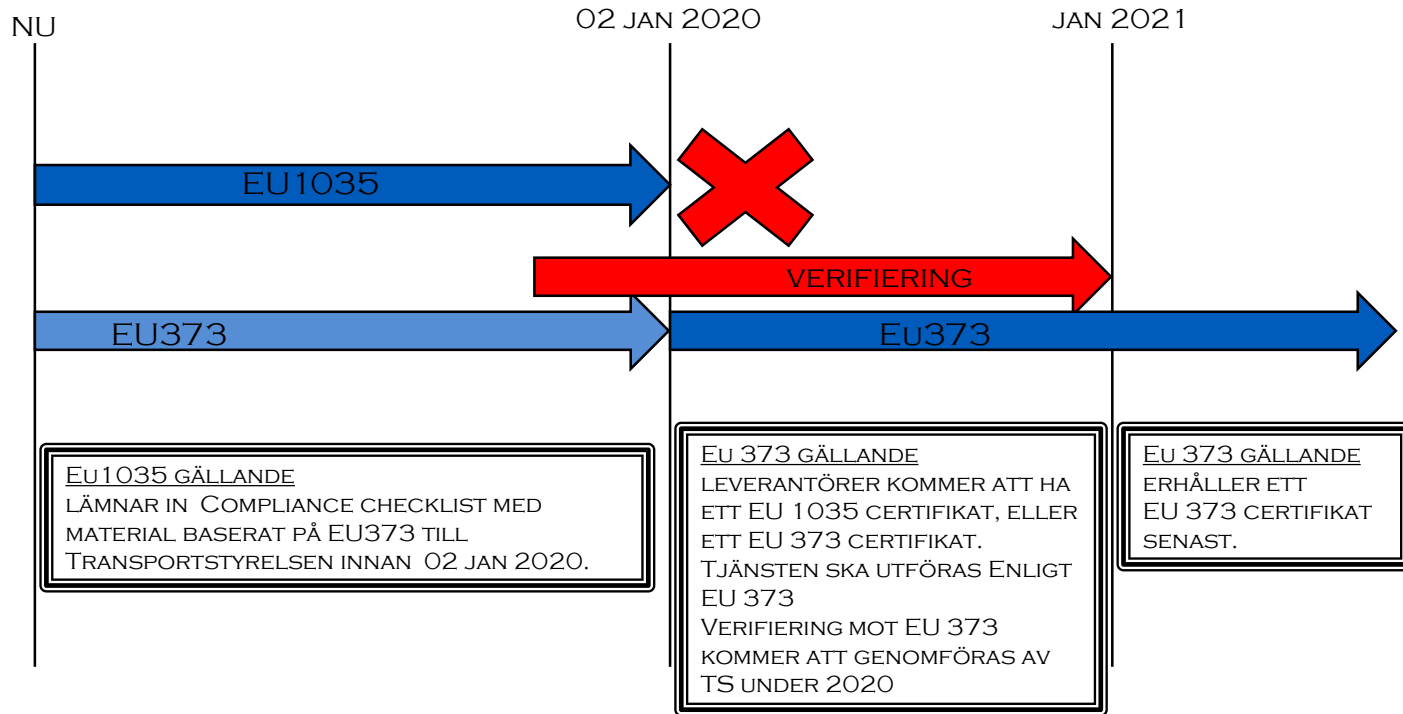
<https://www.transportstyrelsen.se/sv/Regler/Regler-for-luftfart/eu-regler/implementering-av-eu-2017373/>

Information från er angående status implementering 2017/373

- Bordet runt
 - Vem, vilka tjänster avses certifieras samt statusen på arbetet hos er

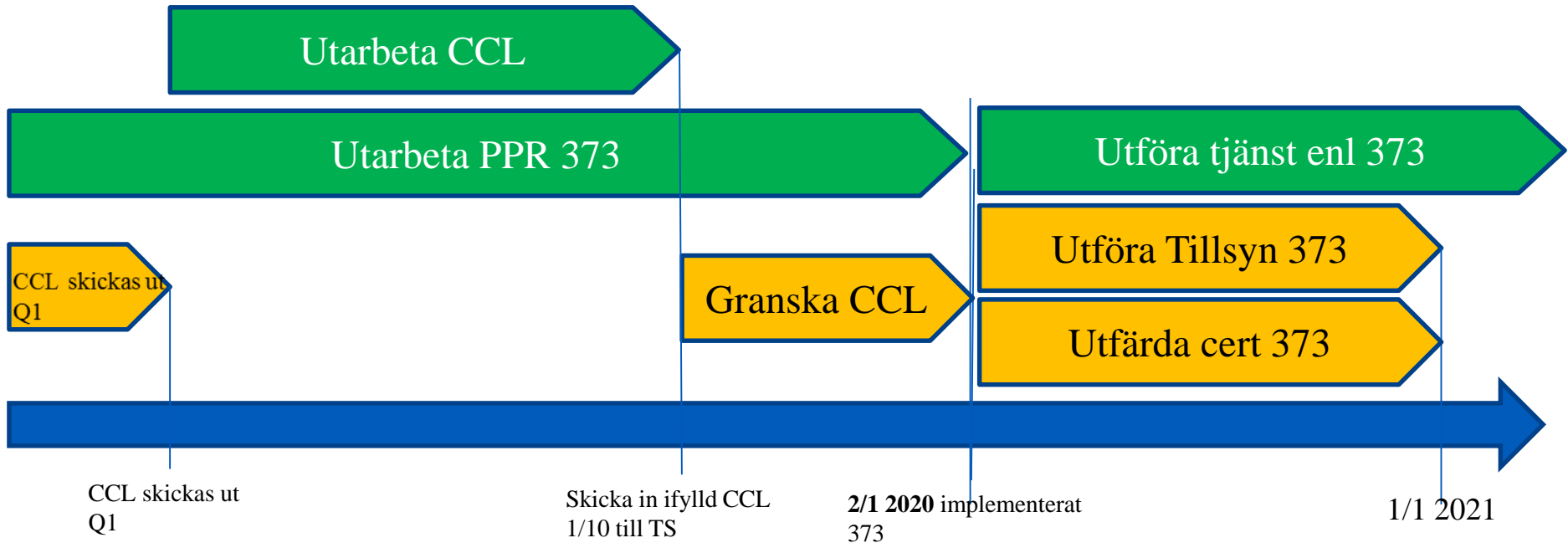
Tidsplan

Tidsramar givna av (EU) 2017/373



Tidsramar – När CCL ska in och när ska våra processer skickas

- CCL har skickats ut under Q1
- CCL ska skickas in till TS Q3
- Processer för godkännande
 - Process, procedur, rutin (PPR) för changes ska godkännas av myndigheten.



Begränsade certifikat

Vilka kan ansöka om begränsat certifikat (ATM/ANS.OR.A.010)

- (a) Notwithstanding point (b), the air traffic services provider may apply for a certificate limited to the provision of services in the airspace under the responsibility of the Member State where its principal place of operation or, if any, registered office is located, when it provides or plans to provide services only with respect to one or more of the following categories:
 - (1) aerial work;
 - (2) general aviation;
 - (3) commercial air transport limited to aircraft with less than 10 tonnes of maximum take-off mass or less than 20 passenger seats;
 - (4) commercial air transport with less than 10 000 movements per year, regardless of the maximum take-off mass and the number of passenger seats; for the purposes of this provision, 'movements' means, in a given year, the average over the previous three years of the total number of take-offs and landings.
- (b) In addition, the following air navigation service providers may also apply for a limited certificate:
 - (1) an air navigation service provider, other than a provider of air traffic services, with a gross annual turnover of EUR 1 000 000 or less in relation to the services they provide or plan to provide;
 - (2) an air navigation service provider providing aerodrome flight information services by operating regularly not more than one working position at any aerodrome.

Minimikraven som ska uppfyllas

- (1) point [ATM/ANS.OR.B.001](#) Technical and operational competence and capability;
- (2) point [ATM/ANS.OR.B.005](#) Management system;
- (3) point [ATM/ANS.OR.B.020](#) Personnel requirements;
- (4) point [ATM/ANS.OR.A.075](#) Open and transparent provision of services;
- (5) Annexes IV, V, VI and VIII, where those requirements are applicable in light of the services that the service provider provides or plans to provide, in accordance with [Article 6](#).

Dagsläget - begränsade

- AFIS, begränsningar i certifikaten
 - I dagsläget finns det begränsningar på delar i SMS:et, vilket inte kommer att vara möjligt när 373 implementeras (Part-ATS ska följas som ett minimikrav)
- CN –begränsade certifikat här

373 öppna för nationella tilläggskrav

- Reguljärtrafik
- AFIS enheterna är specifika enheter med olika förutsättningar

Förslag till bibehållande för nationella krav

1. ATM/ANS.OR.A.020 means of compliance (Alt MOC)
2. ATM/ANS.OR.A.025 Continued validity of certificate
3. ATM/ANS.OR.A.035 Demonstration of compliance
4. ATM/ANS.OR.A.040 Changes – general
5. ATM/ANS.OR.A.045 Changes to a functional system
6. ATM/ANS.OR.A.050 Facilitation and cooperation
7. ATM/ANS.OR.A.055 Findings and corrective actions
8. ATM/ANS.OR.A.060 Immediate reaction to a safety problem
9. ATM/ANS.OR.A.065 Occurrence reporting
10. ATM/ANS.OR.A.070 Contingency plans
11. ATM/ANS.OR.A.075 Open and transparent provision of services
12. ATM/ANS.OR.B.010 Change management procedures
13. ATM/ANS.OR.B.015 Contracted activities
14. ATM/ANS.OR.B.025 Facilities requirements
15. ATM/ANS.OR.B.030 Recordkeeping
16. ATM/ANS.OR.B.035 Operational manuals
17. Suppart C för icke ATS leverantörer.
18. ATM/ANS.OR.D.005 Business, annual and performance plans
19. ATM/ANS.OR.D.010 Security management
20. ATM/ANS.OR.D.015 Financial strength
21. ATM/ANS.OR.D.020 liability and insurance cover
22. Part Pers (annex XIII)

Planen för krav begr certifikat

- De "22" tilläggskraven läggs in som nationella krav
- Det kommer ges möjlighet att söka om undantag från dessa
- Ansökan om undantag skickas in senast 2020-01-01, och minimikraven i 373 följs tills svar på undantag har kommit.
- Om inga undantag skickats in gäller minimikraven i 373 PLUS de nationella kraven 2020-01-02

Kom ihåg!

- I kravet ATM/ANS.B.005 ledningssystem finns delar av dessa, så man kan inte helt begära undantag från vissa krav
 - Tex changes
- (4) a process to identify changes within the service provider's organisation and the context in which it operates, which may affect established processes, procedures and services and, where necessary, change the management system and/or the functional system to accommodate those changes;

Changes och Changes functional system

- Vilka changes omfattas
- Hur ska dessa anmälas
- Vilken information

ATM/ANS.OR.A.040

ATM/ANS.OR.A.040 Changes — general

Regulation (EU) 2017/373

- (a) The notification and management of:
 - (1) a change to the functional system or a change that affects the functional system shall be carried out in accordance with point [ATM/ANS.OR.A.045](#);
 - (2) a change to the provision of service, the service provider's management system and/or safety management system, that does not affect the functional system, shall be carried out in accordance with point (b).
- (b) Any change as referred to in point (a)(2) shall require prior approval before implementation, unless such a change is notified and managed in accordance with a procedure approved by the competent authority as laid down in point [ATM/ANS.AR.C.025\(c\)](#).

ATM/ANS.OR.045

- (a) A service provider planning a change to its functional system shall:
 - (1) notify the competent authority of the change;
 - (2) provide the competent authority, if requested, with any additional information that allows the competent authority to decide whether or not to review the argument for the change;
 - (3) inform other service providers and, where feasible, aviation undertakings affected by the planned change.
- (b) Having notified a change, the service provider shall inform the competent authority whenever the information provided in accordance with points (a)(1) and (2) is materially modified, and the relevant service providers and aviation undertakings whenever the information provided in accordance with point (a)(3) is materially modified.
- (c) A service provider shall only allow the parts of the change, for which the activities required by the procedures referred to in point [ATM/ANS.OR.B.010](#) have been completed, to enter into operational service.
- (d) If the change is subject to competent authority review in accordance with point [ATM/ANS.AR.C.035](#), the service provider shall only allow the parts of the change for which the competent authority has approved the argument to enter into operational service.

Forts ATM/ANS.OR.045

- (e) When a change affects other service providers and/or aviation undertakings, as identified in point (a)(3), the service provider and these other service providers, in coordination, shall determine:
 - (1) the dependencies with each other and, where feasible, with the affected aviation undertakings;
 - (2) the assumptions and risk mitigations that relate to more than one service provider or aviation undertaking.
- (f) Those service providers affected by the assumptions and risk mitigations referred to in point (e)(2) shall only use, in their argument for the change, agreed and aligned assumptions and risk mitigations with each other and, where feasible, with aviation undertakings.

Innehåll i notification – AMC1ATM/ANS.OR.A.045(a)

The notification of a change should not be considered complete until the following information is provided:

- (a) Name of the organisation notifying the change;
- (b) Unique identifier of change;
- (c) Version number of notification;
- (d) Title of the change;
- (e) Date of the submission of the original of this change notification;
- (f) Scheduled date of entry into service (even if only approximate);
- (g) Details of the change and its impact;
- (h) The list of the service providers and other aviation undertakings that are affected by the change as identified in [ATM/ANS.OR.A.045\(a\)\(3\)](#);
- (i) Entity in charge of the assurance case; and
- (j) Identity of a point of contact for communications with the competent authority.

ATM/ANS.OR.B.010 Change management procedures

- (a) A service provider shall use procedures to manage, assess and, if necessary, mitigate the impact of changes to its functional systems in accordance with points [ATM/ANS.OR.A.045](#), [ATM/ANS.OR.C.005](#), [ATS.OR.205](#) and [ATS.OR.210](#), as applicable.
- (b) The procedures referred to in point (a) or any material modifications to those procedures shall:
 - (1) be submitted, for approval, by the service provider to the competent authority;
 - (2) not be used until approved by the competent authority.
- (c) When the approved procedures referred to in point (b) are not suitable for a particular change, the service provider shall:
 - (1) make a request to the competent authority for an exemption to deviate from the approved procedures;
 - (2) provide the details of the deviation and the justification for its use to the competent authority;
 - (3) not use the deviation before being approved by the competent authority.

AMC1 ATM/ANS.OR.B.010(a)

GENERAL

- (a) The procedures, and the change of the procedures, used by a service provider to manage changes should cover the complete lifecycle of a change.
- (b) The service provider should show that the procedures address all the actions and all the evidence needed in order to comply with the requirements laid down in [ATM/ANS.OR.A.045](#), [ATS.OR.205](#), [ATS.OR.210](#), and [ATM/ANS.OR.C.005](#), as appropriate. For that purpose, the service provider should use a compliance matrix, which shows:
 - (1) which part of a procedure addresses which part of the Regulation (i.e. the requirement of the implementing rule); and
 - (2) the rationale explaining how the procedures demonstrate compliance with the Regulation.
- (c) The service provider should ensure that the roles and responsibilities for the change management processes are identified in the procedures.
- (d) Procedures should be submitted in a manner agreed between the service provider and the competent authority. Until an agreement is reached, the competent authority will prescribe the means of submission.
- (e) The procedure that defines the notification process for changes includes:
 - (1) the point of contact in charge of the notification of changes, e.g. person, or part of the organisation and the role;
 - (2) the means used for notification, e.g. fax, email, mail, use of database or others.
- (f) The management of change procedures should include a change identification procedure. This procedure, which is a precursor of the change notification process, should seek out potential changes, confirm that there is a real intent to implement them (propose the change) and, if so, initiate the notification process.

Vad ingår då i changes process?

- Funktionella system förändringar
- Ändringar i ledningssystem och SMS
 - PPR som resulterar i safety records
 - PPR som är del i kvalitet (tex audit, kvalitetsstyrning)
 - PPR security/informations security
 - PPR som styr tex ekonomi, anställning mm omfattas inte

Godkännande av processen

- Myndigheten granskar PPR efter satta krav i AMC
 - Tillägg som Myndigheten gör kommer att gälla innehåll i notifiering och presenteras på hemsidan, tex
 - Tillämpliga standarder, kvalitetssäkring, HF-krav
 - GM1 ATM/ANS.OR.A.045(a)
- Skrivbordsgranskning ev TK

Process för godkännande förändringar FS

AMC1 ATM/ANS.AR.C.030(b) Approval of change management procedures for functional systems

ED Decision 2017/001/R

APPROVAL OF PROCEDURES

- (a) When approving the change management procedures for functional systems as per [ATM/ANS.OR.B.010](#), the competent authority should perform the following:
- (1) check that the procedures used by a service provider to manage changes cover the life cycle of a change as defined in [ATM/ANS.OR.C.005\(a\)\(1\)](#) or [ATS.OR.205\(a\)\(1\)](#);
 - (2) use the compliance matrix provided by the service provider (referred to in [AMC1 ATM/ANS.OR.B.010\(a\)](#)), when reviewing the content of the procedures, modifications and/or deviations referred to in [ATM/ANS.AR.C.030\(a\)](#); as part of the oversight activity, the competent authority should check that the compliance matrix covers all the aforementioned requirements.
 - (3) check that the procedures make mandatory provisions that require actions to be undertaken and all required evidence to be produced to comply with requirements laid down in [ATM/ANS.OR.A.045](#), [ATM/ANS.OR.C.005](#), [ATS.OR.205](#) and [ATS.OR.210](#);
 - (4) check that the procedures identify the roles and responsibilities of the service provider in the change management processes;
 - (5) check that the procedures state that it is not allowed to use new, modified or deviating change management procedures until approval is granted; and
 - (6) check that the procedures state that any change selected for review must not enter into operational service before the approval is granted.
- (b) The competent authority should provide a response to the service provider's notification of change referred to in [ATM/ANS.OR.A.045\(a\)](#) without undue delay.

Hur kommer ni granska rent praktiskt

- När CCL inkommit till Transportstyrelsen kommer en genomgång av dessa att genomföras
- Eventuella brister kommer att adresseras innan 2020, speciellt gällande changes management
- Under 2020 kommer tillsyn att genomföras på 373
 - Genom VK
 - Genom TK
 - Genom betingat tillsyn
- Efter detta kommer nya certifikat att utges

Summering dag I

Part-Pers ATSEP

- **20. Teknisk personal med flygsäkerhetsrelaterade uppgifter (ATSEP, Air Traffic Safety Electronics Personnel):**

”all bemyndigad personal som är behörig att hantera, underhålla, samt även ta ur drift och åter sätta i drift, den utrustning som ingår i det funktionella systemet.”

ATSEP.OR.105 Utbildnings- och kompetensbedömningsprogram

- I enlighet med punkt ATM/ANS.OR.B.005 a.6 ska den tjänsteleverantör som anlitar ATSEP inrätta ett utbildnings- och kompetensbedömningsprogram som omfattar de uppgifter och skyldigheter som ska fullgöras av ATSEP.
- När ATSEP anlitas av en *kontrakterad* organisation ska tjänsteleverantören säkerställa att dessa ATSEP har erhållit den relevanta utbildning och kompetens som anges i detta kapitel.

- **ATM/ANS.OR.B.005 Ledningssystem**

(a) En tjänsteleverantör ska införa och upprätthålla ett ledningssystem som omfattar

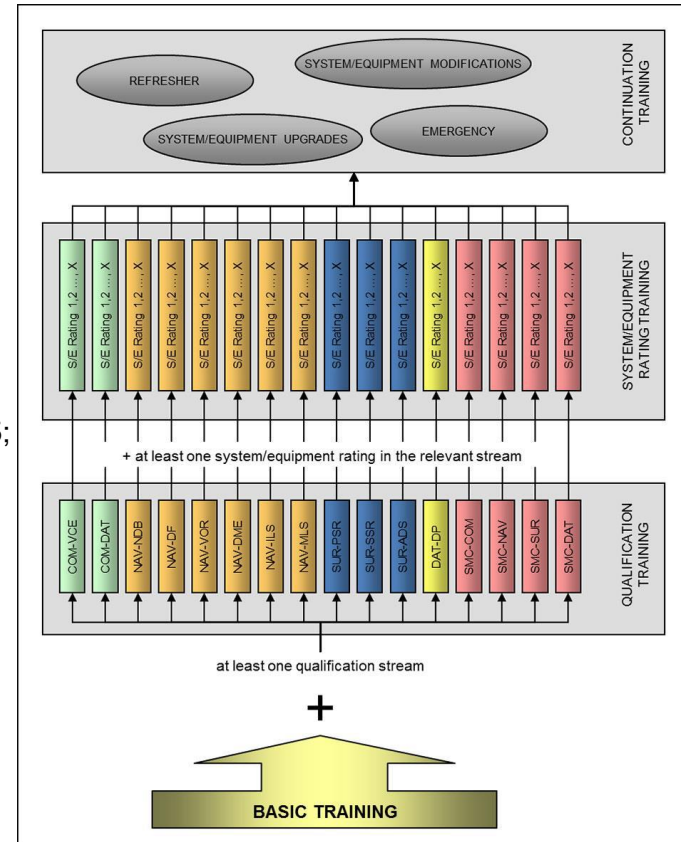
- (6) en process för att säkerställa att tjänsteleverantörens personal är utbildad och kompetent att utföra sina arbetsuppgifter på ett säkert, effektivt, kontinuerligt och hållbart sätt,
- i detta sammanhang ska tjänsteleverantören fastställa policyer för rekrytering och utbildning av sin personal,

AMC1 ATM/ANS.OR.B.005(a)(6) Management system

- **TRAINING AND COMPETENCY**
- A service provider should:
 - (a) determine the necessary competence for personnel performing activities supporting services provision;
 - (b) where applicable, provide training or take other actions to achieve the necessary competence;
 - (c) evaluate the effectiveness of the actions taken;
 - (d) ensure that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the objectives; and
 - (e) maintain appropriate records of education, training, skills and experience.

- **ATSEP.OR.200**

- A service provider shall ensure that ATSEP:
 - (a) have successfully completed:
 - (1) the basic training as set out in point ATSEP.OR.205;
 - (2) the qualification training as set out in point ATSEP.OR.210;
 - (3) the system/equipment rating training as set out in point ATSEP.OR.215;
 - (b) have completed continuation training in accordance with point ATSEP.OR.220

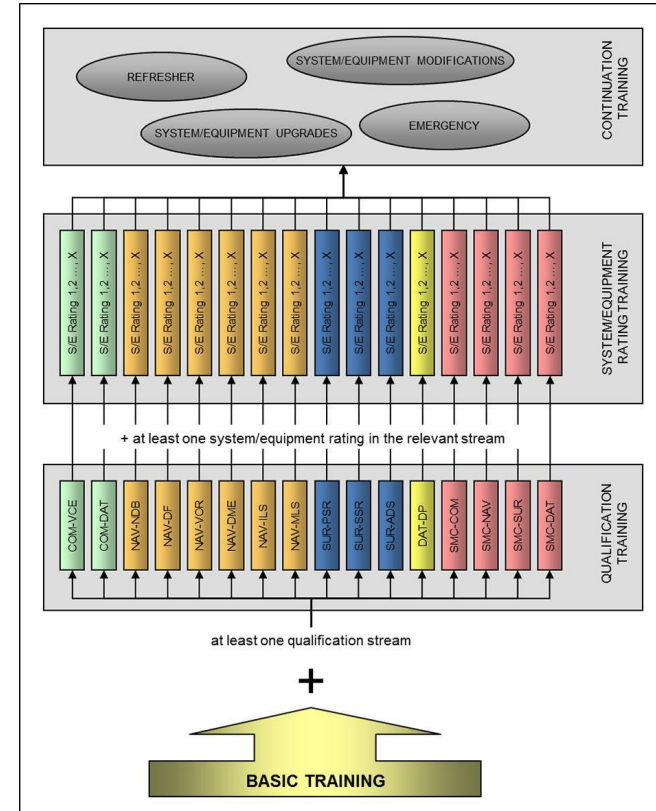


- (3) the system/equipment rating training as set out in point ATSEP.OR.215
- **GM1 ATSEP.OR.215 System and equipment rating training**
- A system and equipment rating is the authorisation which allows the ATSEP to perform operational tasks on specific system/equipment and may, optionally, include an association with operational site/s, location/s and/or maintenance task levels. The award of this rating follows the successful assessment of operational competence.

- Utbildningskrav, anpassning utifrån personliga förkunskaper
- AMC (det enda för Part PERS - ATSEP)
- The subjects, topics, and sub-topics should be tailored to:
 - (a) the responsibility of the ATSEP regarding the service provider's activities; and
 - (b) prior experience and education of the candidate ATSEP.

- **Behörigheter ATSEP:**
- Enligt Part PERS efter erhållen och verifierad kompetensnivå inom ramen för behörighetsutbildning med specialisering på system och utrustningar. Kan avse en eller flera utbildningsvägar av C, N eller S med grundbehörighet samt minst en system alternativt utrustningsbehörighet
- **Vem utfärdar behörighet?**
- Regleras i **ATSEP.OR.110** ”Utöver punkt ATM/ANS.OR.B.030 ska den tjänsteleverantör som anlitar ATSEP föra register över all utbildning som fullgörs av ATSEP, samt över kompetensbedömning avseende ATSEP, ...”

- specific system/equipment
- ATM/ANS.OR.B.005 a.6
...ska den tjänsteleverantör som anlitar ATSEP inrätta ett utbildnings- och kompetensbedömningsprogram som omfattar de uppgifter och skyldigheter som ska fullgöras av ATSEP.
- Vad har ni för flygsäkerhetsrelaterade utrustningar?
Lista ??



Verkligheten

- ATSEP: Eltel, Saab och lokala utbildade
- Köpt på UH-Kontrakt flygplats (=system eller utrustningsägare)
- Köpt på UH-kontrakt CNS-leverantören (= system eller utrustningsägare)

Utrustningslistor?

Bemyndigande ATSEP

Katten på råtten på repet...

(==> Behörig att vara ATSEP hos Eltel och då företräda CNS-leverantören LFV hos ACR när Eltel underhåller Flygplatschefens utrustningar eller system?)

- Inom avtalsrätten är behörighet någons rätt att med hjälp av en fullmakt företräda den som gett fullmakten gentemot tredje man. Det är ett vidare begrepp än befogenhet.

Uppsummering