



23/ 11 /2018

COMMENT RESPONSE DOCUMENT FOR NPA ATCL/01/18

1. Introduction

NPA ATCL/01/18 was published for comment 22 August 2018. The NPA is a result of the introduction of regulatory requirements for Air Traffic controller licensing, training and medical certification by SCAA.

2. Comments & Responses

Two sets of comments were received from Air Risk International Ltd and SCAA ATM.

In the following table the received comments are sorted according to NPA ATCL/01/18 paragraph number, the comment is worded together with the originator, the response to the comment from the NPA ATCL/01/18 Working Group is worded and the resulting text for NPA ATCL/01/18 is given.

Note: ***Bold Italics*** are used to show changes and new text

NPA paragraph	Comment originator	Comments	Response	Resulting Text/Clarification
<p>Article 24 of the repealed EU 805/2011 adapted through SAR-ATCL 61</p>	<p>Air Risk International Ltd</p>	<p>Article 24 of the repealed EU 805/2011 states:</p> <p><i>“Competence assessment</i></p> <p><i>1. Competent authorities shall approve the licence holders who are entitled to act as competence examiners or competence assessors for unit and continuation training.</i></p> <p><i>2. The approval shall be valid for a renewable period of three years.”</i></p> <p>Suitably qualified SCAA ATCOs have completed assessor and examiner courses for the purposes of:</p> <ul style="list-style-type: none"> a. determining the progress of an ATCO under training against the UTP milestones and making appropriate recommendations (assessor) b. carrying out examinations for the award of a unit endorsement (examiner) c. assessing competence of unit endorsed ATCOs on an annual basis (examiner) <p>The differentiation of assessor and examiner roles is based on the UK CAA model with the exception that the UK included unit examiner as a licence endorsement. SCAA</p>		

		<p>issues a Letter of Authorisation.</p>		
<p>Article 8 paragraph 4 of EU340/2015</p>		<p>The Assessor privileges listed in ATCO.C.045 makes no mention of the former assessor function in relation to the unit training plan (UTP) or the unit endorsement courses (UEC) nor is there any requirement for the Assessor to have experience as an OJTI.</p> <p>The philosophy between the separation of the former assessor and examiner roles is that:</p> <ul style="list-style-type: none"> a. the assessor assesses whether a trainee ATCO had achieved the performance objectives detailed in the UTP and where appropriate, to make recommendations to enable the trainee to meet these 	<p>ATCO.C.045 (b) (3) makes provision for the assessor authorisation to carry out assessment of student air traffic controllers for the issue of a unit and rating endorsements which directly relates to UTP or UEC;</p> <p>ATCO.C.045 (e) makes provision for an assessor to also hold an OJTI endorsement, or the presence of an OJTI holding the valid unit endorsement associated with the assessment shall be required when assessing for the purpose of issue and renewal of a unit endorsement, and for ensuring supervision on the operational working position.</p>	

		<p>objectives - in other words, a combined instructional/assessing role.</p> <p>b. the examiner determines whether the trainee ATCO has achieved validation standard and is competent to exercise the privileges of his/her licence or that a qualified ATCO remains competent on an annual basis - in simple terms, pass or fail.</p> <p>It is contended that the two roles have different objectives and the combining both could lead to a conflict of interest. (ATCO C.050)</p> <p>The UK CAA identified this issue and determined that the role of the former assessor was essential for the operation of the UTP therefore the function was retained and assessor was renamed "Evaluator" (see CAP 1251 Chap 4 4.29)</p> <p>It is recommended that to separate the functions of training and competence assessment that SCAA adopt the UK CAA model of introducing the role of Evaluator to replace the previous assessor function in</p>	<p>It is an OJTI responsibility to determine whether a student ATCO's has achieved validation standard with entries in the OJT logbook.</p> <p>The term assessment is defined in Article 4 Definitions (6) of CR (EU) 2015/340 as an evaluation of the practical skills leading to the issue of the licence, rating and/or endorsement(s) and their revalidation and/or renewal, including behaviour and the practical application of knowledge and understanding being demonstrated by the person being assessed.</p> <p>The term assessor endorsement is defined in (7) of the same regulation as the authorisation entered on and forming part of the licence, indicating the competence of the holder to assess the practical skills of student air traffic controller and air traffic controller.</p>	
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		<p>the unit training plan. The Evaluator would be a non – endorsed unit specific role but would require a dedicated training course and regulatory approval.</p>	<p>The two definitions are simple enough and along with privileges set forth in ATCO.C.045, they align with ICAO Annex 1 interpretation of assessment and not examination of competence, i.e. skills, knowledge and attitude to perform tasks to prescribe standards set by performance objectives. The Authority finds it unnecessary to introduce the term ‘Evaluator’, as recommended, as confusion could then arise from using the term with ‘Assessor’ in the licensing system having the same meaning.</p>	
Article 5 (2)	SCAA ATM	<p>1. Under Article 5 2; proposing that this part is not deleted as FAB is something that we need to keep under consideration;</p> <p>2. 5 under same section is unclear;</p>	<p>Competent Authority in CR (EU) 2015/340 specifically relates to the certification and safety oversight entity (Regulator) and not service provision entity.</p> <p>2 of Article 5 specifically applies to competent authorities designated by agreement between EU Member States which is governed by other EU regulations for functional airspace blocks or cross border services.</p> <p>5 specifically relates to the defence tools of the State Safety Oversight System, which are Critical Element 4, 5, 6, 7 and 8. A State is required to have these CEs in</p>	

		<p>3. ATCO.A.010 (c); what about the proposal to not have an expiry date on the licence;</p> <p>4. ATCO.B.005; there's no mentioned of age restriction for having an ATCO Licence. How does this relates to the Annex 1 requirement.</p>	<p>place and sufficient staff to be able to implement its air traffic controller licensing safety oversight programmes and certification of training organisation. Inspectorate staffing requirement must be periodically assessed to ensure adequacy and capability of safety oversight delivery.</p> <p>CR (EU) 2015/340 does not place an expiry date on the licence as current licensing standards, SAR-ATCL 61.020 does, but its validity depends on the validity of its content, i.e. ratings, rating endorsements, licence endorsements and unit endorsements which is what ATCO.A.010 (c) refers to.</p> <p>The absence of the age limit from an ATCO licence is a difference against the ICAO Annex 1 SARPs. CIR (EU) 2015/340 does not provide for age requirement for air traffic controller licence applicants, however, there is an implicit requirement of 18 years of age under ATCO.B.001 (b) (1), to which the time needed for completion of the unit endorsement course shall be added, since the requirement is to hold a student air traffic</p>	
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