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Australian Government
Civil Aviation Safety Authority

**ANNEX B TO SOC ON MULTI-PART
AC 139-05, AC 171-05 AND AC 172-03
V1.0**

Airservices feedback and CASA's response/disposition

May 2024

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Airservices feedback and CASA response/disposition to Draft AC 139-05, AC 171-05 and AC 172-03 - All-weather operations at aerodromes v1.0

B.1 3. Regulatory framework – applicable regulations

B.1.1 Airservices feedback

"Will the new terms be replicated in the Manual of Standards? Such as Runway Aerodrome Visibility Conditions (RAVC) and Reduced Aerodrome Visibility Procedures (RAVP), as defined in section 1.2."

B.1.2 CASA response/disposition

We do not intend to replicate terms like RAVC and RAVP within legislation. Consistent with the practice in the original source document (ICAO EUR Doc 013), RAVC and RACP are general umbrella terms defined specifically for the purposes of the AC. This does not prevent an aerodrome operator or ATS provider using the terms for the purposes of an aerodrome's LVP.

We propose no change.

B.2 4. Introduction to AWO

B.2.1 Airservices feedback

"Air Traffic Control (ATC) may be unaware that visibility below the cloud enables Visibility Condition 2 and therefore, requires an airport delegate to inform or make the decision on visibility condition. We consider this text unclear and could imply it is ATCs decision despite not having the ground perspective when there is low cloud."

B.2.2 CASA response/disposition

Though termed a *visibility condition*, the advice within the AC explains that Visibility Condition 2 exists "...when MET conditions deteriorate to the point that ATC is unable to exercise control over traffic on the basis of visual surveillance". These conditions include both visibility and visibility affected by low cloud, for example the tower being in cloud. Accordingly, the transition from Visibility Condition 1 to Visibility Condition 2 should always be based on the control tower's assessment of its ability to control traffic based on visual surveillance, and not someone else's ground perspective.

We propose no change.

B.2.3 Airservices feedback

"The Bureau of Meteorology are in the process of reducing the number of Observers they will be using and are leading to more automation. This may impact some of the recommendations placed on The Bureau in relation to keeping ATC apprised of changing weather conditions."

B.2.4 CASA response/disposition

The numbers of Bureau of Meteorology observers on an aerodrome should not materially affect the ability of an aerodrome operator and local air traffic control to have arrangements for entering or exiting the different visibility conditions and activating/deactivating the associated procedures. Visibility Condition 1 ↔ Visibility Condition 2 is entirely based on the control tower's assessment of prevailing conditions. Other visibility conditions depend on the layout of the aerodrome; however the AC has guidance on when the different conditions are likely to exist.

Further, Subsection 7.13 of the PANS-ATM (ICAO Doc 4444) as well as subsections 10.3.3 and 10.3.4 of the Part 172 MOS set requirements for low visibility operations which are consistent and complementary with the guidance in the AC. Of relevance are the requirements in paragraph 10.3.3.1 of the Part 172 MOS and subsection 13.02 of the Part 139 MOS (Aerodromes) requiring ATC and the operator of an aerodrome to consult and cooperate on the development of suitable low visibility procedures for an aerodrome.

We propose no change.

B.3 5. Provision to support AWO

B.3.1 Airservices feedback

"Table 1 in section 5.2.3 Construction and maintenance activities – responsibility for the withdrawal of non-essential personnel to be clear of the apron falls with the airport. ATC will need to be informed of their removal from the maneuvering areas."

B.3.2 CASA response/disposition

We note this and draw attention to the requirements of sections 23.02 and 23.03 of the Part 139 MOS, which require an aerodrome operator's LVP to include procedures for:

- control of airside operations including vehicles, drivers and other personnel
- withdrawal of non-essential vehicles and personnel
- coordination with ATC to initiate the aerodrome's LVP
- advising ATC when all aerodrome operator preparations for initiation of LVP are complete.

Logically, an aerodrome operator informing ATC that LVP preparations are completed would be evidence that non-essential personnel are clear of the manoeuvring area.

We propose no change.

B.3.3 Airservices feedback

"Table 3 in section 5.2.5.3 Visual aids – this table applies to visual aids considerations and includes surface movement guidance and control system (SMGCS). We do not consider this to be a visual aid, and recommend that this provision be moved to Table 29 in section 5.7 Surveillance systems."

B.3.4 CASA response/disposition

We believe it is appropriate for Section 5.2.5.3 to include reference to SMGCS. SMGCS, as described in the ICAO Annex 14 Vol I and the ICAO Manual of SMGCS (Doc 9476), covers 'all aspects' pertaining to the guidance, control or regulation of all aircraft, ground vehicles and personnel on the movement area of an aerodrome.

Accordingly, an SMGCS covers a wide range of matters including, but not limited to, a sign saying - 'Park here', the full range of aerodrome markings and light systems, normal visibility and low visibility procedure as well as surface movement radar and A-SMGCS.

We propose no change.

B.3.5 Airservices feedback

"Table 3 in section 5.2.5.3 Visual aids, Row 6 – this does not include an assessment for 'Degree of Compliance'. We note this is the same for other tables within the draft, and recommend that these provisions to be considered and included."

B.3.6 CASA response/disposition

Thank you for this advice.

We will amend the final version of the AC to include any missing details.

B.3.7 Airservices feedback

"We assume that ATC keeping a list of vehicles and personnel on the maneuvering area is to be achieved by a Flight Progress Strip/Movement Strip."

B.3.8 CASA response/disposition

There is no requirement or standard covering the method for recording vehicles and personnel on the manoeuvring area. Any suitable system is acceptable.

No change proposed.

B.3.9 Airservices feedback

"Table 19 in section 5.2.8.8 Vehicles and pedestrians, Row 6 – editorial correction required "The requirement does not apply if the does not apply to an airside vehicle or equipment if the vehicle or equipment is under escort by another vehicle that is appropriately equipped"."

B.3.10 CASA response/disposition

Thank you for this advice.

We will correct the final version of the AC.

B.3.11 Airservices feedback

"Table 25 in section 5.3.6 RVR, Row 7 – this varies from how we update RVR and how it is depicted in the Australian Manual of Air Traffic Services (MATS)."

B.3.12 CASA response/disposition

We acknowledge that the referenced table row differs from MATS practice and note that it replicates and partly contradicts the recommendation in Table 31. As ATC will normally pass RVR information to aircraft, the information more logically should only appear in Table 31.

We will omit the referenced table row.

B.3.13 Airservices feedback

"Table 30 in section 5.8 Air traffic services, Row 1 – this refers to 'Initiate LVP measures whenever conditions are such that all or part of the manoeuvring area cannot be visually monitored from the control tower'. We recommend amendment to include 'meteorological conditions' to ensure consistency as per the reference and prevent broadening of the term conditions."

B.3.14 CASA response/disposition

We agree with this recommendation. It aligns with the wording in paragraph 10.3.3.1 of the Part 172 MOS as well as the intent in paragraph 7.13.1.1 of the PANS-ATM (ICAO Doc 4444).

We will amend the final version of the AC accordingly.

B.3.15 Airservices feedback

"Table 30 in section 5.8 Air traffic services – this refers to ATC applying longitudinal separation on taxiways applicable for each particular aerodrome. This is not supported by any standards. We recommend amendment to include the word 'segregate'."

B.3.16 CASA response/disposition

According to 7.13.1.1.2 of PANS-ATM (ICAO Doc. 4444), Longitudinal separation during LVP is a long-standing requirement. Further, there is no provision that low visibility conditions reduces or diminishes the cardinal Annex 11 requirement for ATC to prevent '...collisions between aircraft, and on the manoeuvring area between aircraft and obstructions...'.

It is not appropriate to substitute separation with a different term which may imply a lower level of safety or service outcome/responsibility. According to the same paragraph in PANS-ATM, separation in the LVP context is not a predetermined distance/time concept like en-route/terminal separation. Instead, '...separation shall take into account the characteristics of the aids available for surveillance and control of ground traffic, the complexity of the aerodrome layout and the characteristics of the aircraft using the aerodrome...' Section 4.5 of ICAO Doc 9476 (SMGCS Manual) provides detailed guidance on separation at intersections and longitudinal spacing. We also draw your attention to the definitions for *separation* and *spacing* that are included in the AC.

We propose no change.

B.3.17 Airservices feedback

"Section 5.10.9 Air traffic flow management – we recommend assessing the provisions and associated principles against Aeronautical Information Package (AIP) Priorities."

B.3.18 CASA response/disposition

We note the recommendation but believe nothing in Section 5.10.9 implies the ability to deviate from operating priorities.

We propose no change.

B.3.19 Airservices feedback

"To ensure alignment across all-weather operation documentation, we believe further engagement is required between CASA and Airservices before the AC is finalised. A workshop has been proposed."

B.3.20 CASA response/disposition

An AA/CASA briefing on the matter took place on 27 March 2024.

B.4 8. Low visibility procedures

"The Sensitive Area will vary depending on the setup of the Localizer (LLZ) Aerial. Airservices has defined separate critical areas for vehicles and aircraft (Aircraft Critical Areas and Vehicle Critical Areas) for efficient aerodrome operations, as these areas have significantly different dimensions and are managed in different

ways. The size of the areas is dependent on the installed antenna type and its configuration at that site. Therefore, the dimensions of the areas are site dependent, and documented in drawings, which are outlined in the Local Instructions for each aerodrome."

B.4.1 CASA response/disposition

Airservices was asked, and confirmed, this feedback was a comment only.

B.4.2 Airservices feedback

"The Landing Clearance Line is a new concept, in addition to addressing the variation in width of the critical and sensitive areas (CSA).

To ensure alignment across all-weather operation documentation, we believe further engagement is required between CASA and Airservices before the AC is finalised. A workshop has been proposed."

B.4.3 CASA response/disposition

An AA/CASA briefing on the matter took place on 27 March 2024.

B.5 10. GBAS landing system

Airservices notes this commentary does not refer to the proposed AWO and on this basis, does not object to this commentary being published.

B.5.1 CASA response/disposition

We note this.