



## **ATM Social Partners position on NPA2012-18 ATCO Licensing and Medical certification of air traffic controllers**

Brussels, 2<sup>nd</sup> May 2013

By email

To: Patrick Goudou  
EASA Executive Director

Copy to: Matthew Baldwin,  
Director - Air Transport  
EC-DG MOVE

Dear Mr. Goudou,

Over the last few months ETF, ATCEUC and CANSO, the ATM Social Partners, have been holding joint meetings regarding the above NPA, the result of which is that in several areas the three organisations have reached a common position. As we are sure you are aware the three organisations represent the vast majority of ATCOs and ANSPs that will be affected by the proposals.

The three organisations wish to stress to EASA the amount of constructive dialogue and effort that has been expended in the seeking of areas of commonality. This has been a truly exemplary instance of social dialogue that we would also seek to emphasise.

In addition to the submitting of comments via the comment response tool, we would jointly like to take the opportunity to highlight, amongst others, the main areas where we have achieved a common consensus. These are the ***Provisional Inability concept, Language Proficiency and Remote Towers.***

### **1. Provisional Inability**

The three organisations share the same opinion about the concept being only applied for fitness of ATCOs and not to competence. Competence is a different issue and we would advise caution as to confusing the two concepts.

## 2. Language Proficiency

The three organisations recognise the importance of language as an important safety issue and agreed to improve the actual model by increasing the proficiency through training and to extend it to all levels to deal with language erosion.

## 3. Remote Towers

On the Remote Towers, ATCEUC, ETF and CANSO agree that for every and each aerodrome there should exist a unit endorsement and the training for Remote Operated towers might be harmonized at European level by Eurocontrol Common Core Content Task Force.

All the three organisations recognised that at this stage the concept lacks a lot of information and some more documentation should be available to perform a correct evaluation and to clearly measure the ongoing impacts.”

We feel that these are some of the key areas to the success of the proposed Implementing Regulation, and as representatives of the ATM sector both as employers and as employees, we would respectfully ask that EASA views our comments and opinion with a high degree of creditability and seriousness.

We would also like to stress that due to the time required for internal coordination purposes, we felt it necessary to prioritise our work in the areas of greatest importance. Given greater resource and additional coordination we are confident other areas of commonality would have been found, and we would ask you not to draw any adverse conclusions from the fact we haven't indicated agreement on other subjects.

Please do not hesitate to contact us if you have any questions or seek further clarification.

Kind regards

Riccardo Rubini  
ATM Committee President  
ETF

Guenter Martis  
Director European Affairs  
CANSO

Volker Dick  
President  
ATCEUC

