

## POSITION PAPER

### Revision of the SPI IR

The European Commission has proposed a two-step approach for the revision of the SPI IR. The ICB supports this approach and urges the Commission to ensure widespread stakeholder involvement in the elaboration of Step 2. This paper sets out the context and detail of the ICB position.

## 1 CONTEXT

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As part of their on-going review of SES interoperability implementing rules, the European Commission organised a workshop on the implementation of the Surveillance Performance and Interoperability (SPI) Implementing Rule on the 7<sup>th</sup> March 2014<sup>1</sup>. The workshop concluded that significant revision of the SPI IR was required to address implementation issues.

The European Commission are proposing a two-step process for the revision of the SPI IR:

- a) Step 1: Minimal changes, principally in delaying effective dates for airborne equipage, to provide sufficient time for a detailed review.
- b) Step 2: Significant changes in line with the detailed review.

This approach has been outlined by the Commission in a paper to the 53<sup>rd</sup> Meeting of the Single Sky Committee (SSC)<sup>2</sup>. The Commission are seeking support from the SSC for the amendments to the regulation proposed in Step 1 at SSC/54.

## 2 ICB POSITION

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The ICB supports the proposed two step approach for the revision of the SPI IR.

The ICB considers that the proposed amendments for Step 1, solely delaying the effective dates for airborne equipage, are consistent with the aim of quickly adopting a simple amendment that provides sufficient time for a detailed review of the IR in Step 2.

The ICB considers that a substantial review in the form of a full Regulatory Impact Assessment is required to inform Step 2, particularly if the objective of the legislation is to support widespread adoption of ADS-B. The issues to be considered include:

- a) The need to ensure 100% equipage in applicable airspace.
- b) Data quality requirements and appropriate surveillance mix for different types of operation.
- c) The need for cost effective transition including the impact on existing investments and affordable solutions for all airspace users.
- d) The need for coordination of the deployment activity so that a cohesive network is available.
- e) The need to recognise EASA as the authority assessing compliance with the SPI IR.
- f) The need to reassess the exemption processes and set in place related supporting legal mechanisms and an exemption cell.

<sup>1</sup> <http://www.eurocontrol.int/events/european-commission-workshop-implementation-regulation-eu-no-12072011-surveillance>

<sup>2</sup> SSC/14/34/5

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- g) The need to reassess the technical content of the SPI IR, and in particular remove detailed technical requirements to be covered by lower level regulation/certification specification.
- h) The need to ensure that the certification standards defined in EASA CS ACNS will not be affected by the proposed step 2 review.

In considering the options for Step 2, the Commission should consider the role of the full EU regulatory framework including the role of the Deployment Manager in effecting a successful synchronised deployment of new surveillance infrastructure.

The ICB urges the Commission to ensure that the working arrangements for the definition of Step 2 include wide representation from the ATM stakeholder community, including representatives from general aviation and the military.