

VC POLICY

UTILIZATION OF AIRSPACE

INTRODUCTION

Approach, arrival and departure routes through uncontrolled airspace carry a higher risk of dangerously close encounters between controlled and uncontrolled traffic. These encounters may significantly infringe the separation standards normally provided in controlled airspace. Due to the higher speeds and inertia of air transport category aircraft combined with only 5km required visibility below 10.000 ft, ICAO's "see and avoid" principle reaches its limitations. This situation poses a serious safety risk.

Therefore, Vereinigung Cockpit promotes the segregation of controlled and uncontrolled traffic.

According to ICAO standards and their regional implementation in Implementing Regulation (EU) 923/2012 "Standardised European Rules of the Air" (SERA), traffic separation service for IFR vs. IFR as well as IFR vs. VFR is only mandated in class A, B or C airspaces¹.

Within class D airspace, permanent radio contact and an ATC clearance are required for VFR traffic. However, no separation service is provided for VFR traffic². But as ATC is aware of and in contact with VFR traffic, it may principally segregate regular commercial flights³ from VFR traffic or provide separation in class D airspace as well.

¹ Class A and B airspaces are not utilized within Germany

² Implementing Regulation (EU) No 923/2012, Appendix 4

³ Regular commercial flights in the context of this airspace policy refers to regularly scheduled or comparable air services with aircraft featuring more than 19 passenger seats or more than 14 tons maximum takeoff mass.

POSITION OF VEREINIGUNG COCKPIT

1. Regular commercial flights in Class D Airspace

Vereinigung Cockpit deems class D airspace suitable for regular commercial flights as long as air traffic control always ensures adequate segregation of these flights from all other airspace users.

This applies especially for airspace designated as class D-CTR.

2. Dimensions of Protected Airspace⁴

IFR procedures and the corresponding airspaces should be designed in a way to be sufficiently dimensioned for the envisaged type of IFR flights and enable these to always operate in protected airspace, taking a suitable buffer into account.

ATC procedures and practices should always require air traffic control personnel (controllers) to keep regular commercial flights within the available protected airspace at all times. Flight Safety must take precedence over economic considerations.

Regular commercial flights should only be routed outside of protected airspace in exceptional situations. Pilots have to be informed about leaving protected airspace. Regular commercial flights outside of protected airspaces has be documented.

3. Review and Optimization of Procedures and Airspaces

At least once a year, all stakeholders should jointly evaluate whether the implemented airspaces and procedures are still appropriate and adjust them if necessary.

This evaluation of airspaces and procedures should consider all safety relevant factors, especially airprox incidents and the number of regular commercial flights outside of protected airspace. The current and expected traffic volume should also be taken into account.

In order to conduct this evaluation as neutrally and objectively as possible, it is vital that ALL safety relevant incidents and factors are known and assessed. For this purpose, Vereinigung Cockpit promotes a central database which registers all aviation incidents within Germany. The assessment of these incidents should be standardized and conducted by a dedicated entity (e.g. APEG, Air Proximity Evaluation Group) in order to be used for the evaluation of airspace or procedural adjustments.

4. Regular commercial flights in Class E Airspace

Vereinigung Cockpit is strictly opposed to any regular commercial flights in class E airspace.

However, if a regular commercial flight in class E is unavoidable, this airspace portion must be fitted with a sufficiently sized Transponder Mandatory Zone (TMZ) and Radio Mandatory Zone (RMZ).

⁴ Vereinigung Cockpit considers class A, B, C and D airspaces as protected airspaces.

It must be assured that all traffic operating in this airspace can be addressed by a single air traffic controller on a single frequency.

Regular commercial flights outside of protected airspace should only be conducted within class E airspace featuring TMZ and RMZ.

5. Transitory measures

Until the above-mentioned requirements are met, Vereinigung Cockpit deems the following measures urgently necessary to minimize operational risk:

Air Traffic Control:

- Introduction of a standardized phraseology (e.g. "Entering/Leaving Airspace Echo") to inform regular commercial flights of its operation in an airspace with impaired separation service.
- All relevant traffic must be visible to ATC
- Traffic information and recommendations for traffic avoidance are to be issued to regular commercial flights regarding all relevant traffic at all times.

Aircraft Operators:

- Operators should provide their pilots with charts and depictions in aircraft (if technically feasible), which contain adequate information about the airspace structure.
- Pilots have to be trained for the particularities of operating in unprotected airspace. This must be part of the recurrent, annual training.
- Flights below FL100 in class D and E airspace must not exceed 250 kts. Exceptions according to Implementing Regulation (EU) 923/2012, SERA 6001, should not be granted. Class C airspace should be established around airports where aircraft operate with minimum clean manoeuvring speeds exceeding 250 kts. Where this is not possible, the operator should take suitable measures to enable safe operation in class D and E airspace.
- Operators should introduce clear procedures for safe operation in uncontrolled airspace. Special emphasis should be given towards maximum speeds as well as procedures for steeper climb and descent profiles. SOPs should advise crews to keep the time in unprotected airspace to a minimum. Operators should adjust their OFPs accordingly.
- Flight safety must always have precedence over economic considerations.

General Aviation:

- All airspace users (manned and unmanned) must be equipped with a suitable transponder.
- A suitable buffer towards controlled airspaces should be kept to avoid unintended infringement of such airspace.