

Airways' response to claims made by NZALPA

Claim 1

Air Traffic Services personnel provide the only accurate reports on the weather conditions at an airport. Without this information there is more risk to aircraft and passengers from poor weather and landing conditions, an increased likelihood of a flight being delayed or cancelled, or of an aircraft diverting to another airport due bad weather, and subsequently running low on fuel.

Airways response:

Poor weather is a routine threat that pilots account for – they plan for diversions and carry sufficient fuel for this. Automatic weather stations that send reports directly to pilots are commonly used in aviation. All of the aerodromes being considered under the proposal, except Milford, already have such systems in place. This is called Automated Meteorological Aerodrome Reporting. While these traditional systems are effective, under the current proposal newer more modern technology could be utilised. Queenstown Airport is an example where modern technology has been deployed to provide a richer real-time weather picture to jet crews than is available through these established systems.

Claim 2:

At uncontrolled aerodromes the limiting weather conditions aircraft can operate in are much lower. Without Air Traffic Services to provide separation and information pilots are required to visually sight each other in order to avoid collisions, but this will become extremely difficult in poor weather creating an increased risk of collision.

Airways response:

Only aircraft suitably equipped can fly in poor weather conditions (instrument meteorological conditions - IMC). Regular transport aircraft (RPT) are equipped with a system so that they are able to detect and avoid each other. Having a control tower at an aerodrome is not the limiting factor in poor weather.

Claim 3.

In uncontrolled airspace it is possible for a large passenger aircraft to be operating in cloud while another aircraft is operating up to the edge of the cloud without either being aware of the other. Neither aircraft would be able to sight or avoid the other in sufficient time to prevent a collision.

Airways response:

Aircraft flying visual flight rules (VFR) in uncontrolled airspace (Class G) are required to keep clear of cloud. If the airspace near the aerodromes is Transponder Mandatory (TM), as it could be designated by the CAA, regular passenger transport aircraft will be able to detect and avoid each other well in advance.

Claim 4.

The majority of the aerodromes at which Airways is proposing to remove Air Traffic Services have no RADAR coverage. The controllers at these locations are specially trained to provide separations for aircraft arriving and departing the airport without the need for RADAR to verify the position of aircraft (Procedural Approach Control). Without Air Traffic Services at these airports, aircraft will not

be able to be monitored to ensure safe separations are present and will be responsible for ensuring their own safety even when they have no visibility of each other. Passenger aircraft need to fly through cloud in order to operate effectively; they will not always be able to use visual 'see and avoid' procedures, nor are they required to by the rules under which they operate.

Airways response:

Many aerodromes in New Zealand without air traffic control do not have radar coverage down to aerodrome level. Kerikeri, Kaitaia, Taupo and Hokitika are examples of airports in New Zealand that Air New Zealand flies to (or recently did) where there is no radar coverage and no tower. There are also numerous examples of uncontrolled regional aerodromes in Australia that do not have radar coverage but have regular passenger transport aircraft services. Ballina Airport in New South Wales and Mildura Airport in Victoria are two examples where jet operations are routine despite the aerodromes being unattended. Air New Zealand has confirmed that jets will still be able to operate at Invercargill Airport without an air traffic control service.

Claim 5.

Pilots are not specifically trained to provide separation from one another when they have no visual reference. Without Procedural Approach Control (or Radar Control) there will be higher risk of a loss of safe separation, or a need to reduce airline schedules to the point where only one aircraft is operating at a time.

Airways response:

Pilots flying regular passenger transport (RPT) aircraft into uncontrolled aerodromes are trained to follow established procedures. Such operations are routine at New Zealand airports including Kerikeri and Taupo. Again, there are also numerous examples of uncontrolled regional aerodromes in Australia where RPT aircraft routinely operate.

Claim 6.

The collision avoidance systems carried by modern aircraft (ACAS/TCAS) are useless in uncontrolled airspace. In uncontrolled airspace other aircraft are not required to carry the equipment that these systems rely on like they are in controlled airspace.

Airways response:

Uncontrolled airspace can be designated Transponder Mandatory airspace, meaning only aircraft fitted with transponders are allowed to fly in these areas. This ensures that regular passenger transport aircraft can detect the other aircraft and take avoiding action.

Claim 7.

There will be an increased risk of accidents caused by the considerable areas of dangerous and unstable air produced behind large aircraft (wake turbulence). As this is normally the responsibility of Air Traffic Services to manage, light aircraft pilots may not be familiar with the danger or the responsibility now placed on them to remain clear of the larger aircraft.

Airways response:

Pilots are trained to manage this hazard. Information about this is able to be published in the aeronautical information provided for each aerodrome. There are numerous examples of aerodromes that service a mix of small and relatively large regular passenger transport aircraft where this hazard is managed through training, and standard published information. Air New Zealand has confirmed that jets will still be able to operate safely at Invercargill Airport without an air traffic control service.

Claim 8

The removal of ATS removes the ability to monitor the correct use of VHF radio equipment essential for pilots to communicate with one another. Any radio mistakes or failures will go uncorrected, causing misunderstandings and a higher risk of accidents.

Airways response:

VHF / radio protocols are part of basic pilot training. Any aviation stakeholder can report another for poor practice to the Civil Aviation Authority.

Claim 9

Air Traffic Services play a role in training and assisting inexperienced pilots to help develop better understanding and safer practices. This function will be lost from those airports.

Airways response:

The responsibility to train pilots is not part of an air traffic control service. Only certified flight instructors are allowed to train pilots.

Claim 10

One of the primary functions of Air Traffic Services is to provide information and assistance to aircraft that are in a state of distress or emergency. This function will be lost, extending the response times of emergency and search and rescue agencies and increasing the likelihood of a fatal outcome.

Airways response:

The level of rescue fire service (RFS) provided at an unattended aerodrome is determined between the part 139 holder (the aerodrome) and the CAA. In uncontrolled airspace, any pilots in the area will remain clear of an aircraft in distress and any listening station will advise emergency response agencies accordingly.

Claim 11

The complexity of an airport's layout and operations has a more significant impact on the collision risk than how busy or not it may be. The need to manage complex airport layouts and integrate complex operations should be the primary determining factor when considering the need for Air Traffic Services, not the number of aircraft movements.

Airways response:

The aerodromes being considered are relatively uncomplex. In areas where there are unusual features, procedures would be developed to manage any associated risks.

Claim 12

Runway incursions by vehicles, people, and wildlife (something or someone being present on a runway without advising other airport or airspace users), were identified by the Civil Aviation Authority to be one of the highest accident risks to large passenger aircraft. The likelihood of these accidents occurring will increase without Air Traffic Services to monitor and manage the runway and ensure it is clear and safe.

Airways response:

This is a hazard that is routinely managed at uncontrolled aerodromes. The aerodromes being considered have low traffic and a relatively straightforward layout. There are numerous examples of uncontrolled regional aerodromes across New Zealand and Australia servicing regular passenger transport aircraft where this hazard is managed by the airport authority using standard protocols and procedures.

Claim 13

There are currently no digital or remote digital tower technologies that are capable of matching the safety and performance of a 'conventional' tower. The costs involved in research and design, infrastructure development, and exhaustive safety testing to implement these technologies will be significant, yet there are no obvious operating cost reductions that can be realised.

Airways response:

Digital Tower technology is operating elsewhere in the world where regular passenger transport aircraft are flying. Hungary's busiest international airport, Budapest Airport, operates a remote digital tower. Norway has deployed the technology extensively in regional airports. The remote tower control centre in Leipzig handles the take-offs and landings at Saarbrücken Airport and is the first international airport in Germany that is no longer monitored from the local tower. A digital air traffic control tower is also soon to be deployed at London City airport.