

ICAO FIS Implementation Call for Input *Engagement Response Document (ERD)*

CAP 3007

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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Enquiries regarding the content of this publication should be addressed to:

ICAOFISCallforInputEngagement@CAA.co.uk

The latest version of this document is available in electronic format at: www.caa.co.uk/CAP3007

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Chapter 1

Introduction

The purpose of this public 'Call for Input' engagement, on improving the degree of alignment between the UK Flight Information Services and the International Civil Aviation Organisation (ICAO) Flight Information Service (FIS) provisions in the UK, was to support the implementation of the Airspace Modernisation Strategy (AMS). We have an obligation to review and optimise our degree of alignment with ICAO provisions. That allows us to demonstrate our air traffic services provision is complementary to that of our neighbouring states, thereby enhancing overall flight safety and providing an adaptable 'visual flight rules (VFR) or instrument flight rules (IFR)' solution to service recipients in classes E and G airspace.

In February 2024, in this 'Call for Input' engagement we sought stakeholder views to inform our development of a proposal, and asked a series of follow-up questions linked to the proposal and the alignment, content and provision of air traffic services in the UK. We provided the opportunity for stakeholders to offer their views and opinions on this subject and to provide narrative answers accordingly. In addition, we offered stakeholders a chance to submit written proposals and counter-proposals as well as a chance to discuss the proposal with CAA staff.

This engagement response document (ERD) shows the questions we asked in this engagement exercise, the feedback we received as well as some objective analysis of the responses we have received. More information on the engagement exercise and the individual responses we have received can be found on the dedicated engagement webpage: <https://consultations.caa.co.uk/policy-development/implementation-of-international-civil-aviation-org/>.

Chapter 2

Responses Summary

Responses Analysis

We received 187 responses in total. In broad terms, respondents were 60% service recipient (pilot/aircraft operator); 40% service provider (ANSP, ATCO, FISO, other). Most respondents, 82%, were offering personal views, the remaining 18% of respondents were submitting on behalf of an organisation. Overall, 88% of respondents supported the intent of the proposal; some respondents proceeded to elaborate why they had answered yes/no and provided reasons and caveats to their responses.

There were some useful and varied opinions from the full range of stakeholders, which supports our assertion that the UK does indeed have a complex and nuanced FIS position which is at odds with other states.

The opinions offered were dependent upon stakeholder's own task(s) and output(s) as well as location and experience (this applies especially overseas, and for those advocating improvement to the delivery of UK Flight Information Services by adopting a hybrid methodology taking the best elements of the French, US and, in particular, the German system).

Of those respondents familiar with CAP 774 (UK Flight Information Services), and who receive/provide UK Flight Information Services in accordance with it, 62% felt it meets their operating requirements and is currently fit for purpose. In addition, 73% of respondents felt that the current edition of CAP 774 was easy to assimilate whereas 27% did not.

Of those CAP 774 services, respondents were familiar with the four air traffic services in descending order: Basic Service, Traffic Service, Deconfliction Service then Procedural Service.

The majority of respondents, 66%, answered that all elements of CAP 774 should be reviewed.

The preponderance of respondents answered that, in descending order, Deconfliction advice; Vectors; Level Allocation; and Sequencing should be considered for inclusion as provisions of future UK Flight Information Services.

In addition, 70% of respondents stated that elements of ICAO Doc 4444 PANS-ATM should be better aligned with, or emphasised, within the future UK Flight Information Services.

Similarly, 74% of respondents stated that the CAA should simplify the operational delivery of UK Flight Information Services, many of the respondents offered opinions as to how this might be achieved.

83% of respondents suggested that the CAA should use technology to improve the delivery of UK Flight Information Services, with many respondents offering opinions on how this might be achieved.

89% of respondents thought it is important to retain a verbal agreement, between ATS provider and recipient, stating the type of service an aircraft is in receipt of.

There were lots of comments about commensurate airspace requirements to balance any potential future changes to UK Flight Information Services where their current application is used in risk mitigation. In addition, respondents provided opinions and comments upon Lower Airspace (Radar) Services ranging from current provision to how it might be provided in the future.

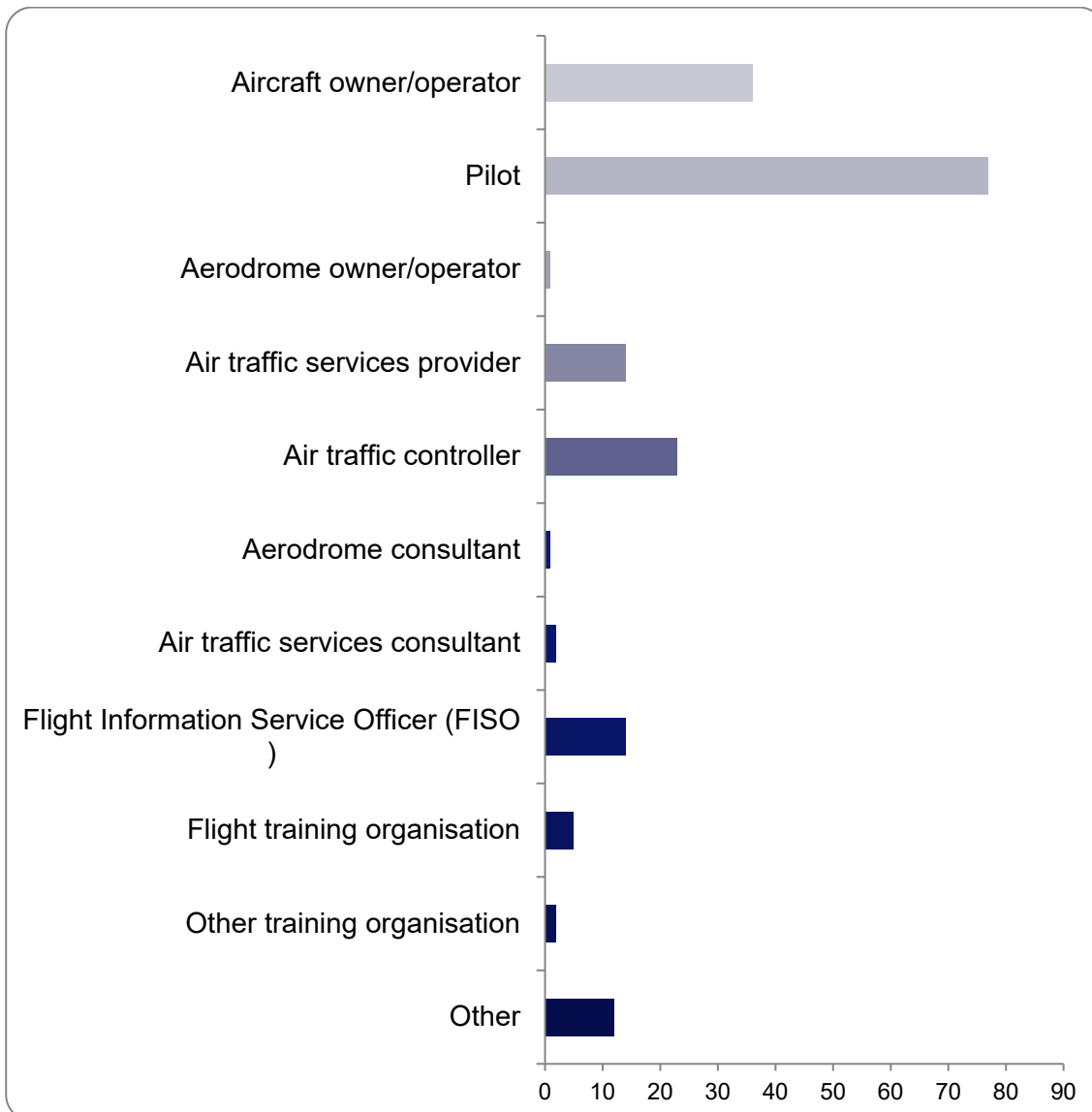
Chapter 3

Stakeholder Engagement Feedback

In this Chapter, you will find the objective data produced by Citizenspace from each of the questions posed in the engagement questionnaire. In addition, there is a short sentence including a figure stating how many responses those questions received. Below that, are some *italicised* excerpts from stakeholder responses that reflect a cross section of the comments and opinions written of the question. Those responses have been attributed in accordance with the stakeholder’s wishes.

Which of the following best describes you or the group you represent?

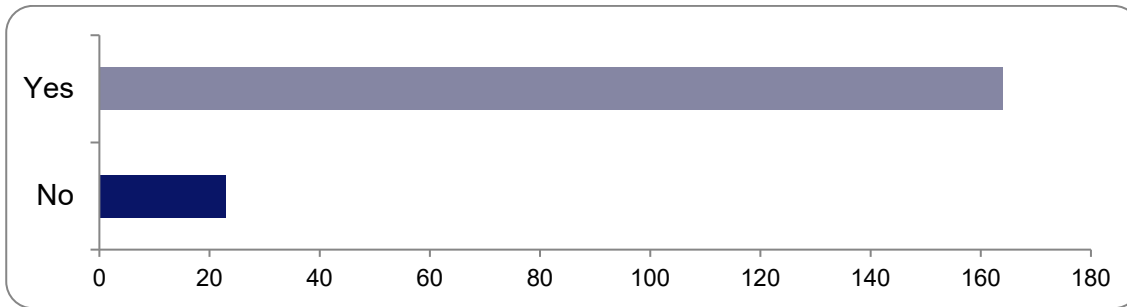
There were 187 responses to this part of the question.



Option	Total	Percent
Aircraft owner/operator	36	19.25%
Pilot	77	41.18%
Aerodrome owner/operator	1	0.53%
Aerodrome personnel	0	0.00%
Air traffic services provider	14	7.49%
Air traffic controller	23	12.30%
Aerodrome consultant	1	0.53%
Airline consultant	0	0.00%
Air traffic services consultant	2	1.07%
Flight Information Service Officer (FISO)	14	7.49%
Flight training organisation	5	2.67%
Other training organisation	2	1.07%
Other	12	6.42%
Not Answered	0	0.00%

Do you welcome the intent of the proposal?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	164	87.70%
No	23	12.30%
Not Answered	0	0.00%

If you answer NO, please ensure you explain why and what you would suggest instead in the relevant section:

There were 37 responses to this part of the question.

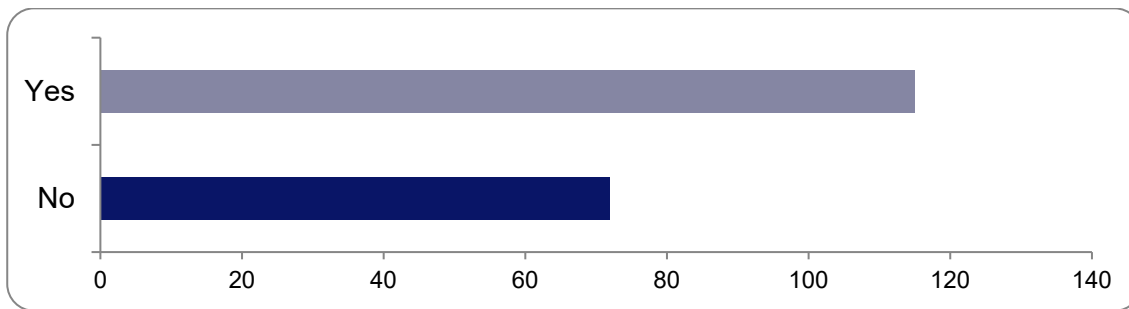
- A pilot who answered Yes, writes: *The services must be available to users of ADS-B as well as conventional radar technology. Flightplans should not be required unless the flight is to cross an international boundary. Co-ordination between service providers/adjacent service providers to reduce clogging the airwaves with life stories.*
- An aircraft operator who also answered Yes, wrote: *Warmly welcomed, the current services need updating.*
- An ATCO who answered No, writes: *'This is clearly a downgrade of the service available to pilots outside controlled airspace.'*

Another ATCO who answered No, wrote: *The removal of deconfliction minima (while great for controllers) will pose a massive risk to operators. The majority already mandate a DS within class G so how will it be acceptable to them to transition to what is essentially currently a BS with surveillance (duty of care etc)?*

Our airspace structure doesn't align with our neighbours who employ 'ICAO FIS' so our provision of service shouldn't. If our airspace structure changes to move away from Class G in the lower air by default then the proposal may be more appropriate, equally if electronic conspicuity becomes mandated (and effective) then this would allow the aircraft to actually detect and avoid the traffic reducing the need for deconfliction minima.

If you are familiar with CAP 774 and/or receive/provide FIS in accordance with it, please indicate whether you feel it 'meets your operating requirements/is currently fit for purpose' (use one of these two phrases)?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	115	61.50%
No	72	38.50%
Not Answered	0	0.00%

If you answer NO, please ensure you explain why and what you would suggest requires improvement.

There were 85 responses to this part of the question.

- An aircraft owner, who answered No, wrote: *I operate mainly in Class G airspace. It is very difficult to obtain any sort of service at most times and when obtained is usually a basic service unsupported by surveillance. In most cases this service serves no real purpose. Other states provide an easily accessed surveillance supported traffic service which usually provides useful traffic information. Admittedly this usually requires at least a Mode-C transponder but aircraft not so equipped are now a minority.*
- Another aircraft owner, who answered Yes, wrote: *I answered "Yes" because it meets my operating requirements, as did FIS prior to Mar 2009 when FIS, RIS & RAS changed to Basic etc - you're now proposing changing it back to align with ICAO SARPS - was that not a pointless 15 year inconvenience?*
- A pilot, who also answered No, wrote: *It's far too detailed and verbose for a 'mere Class G pilot'...*

- Another pilot, who answered No, wrote: *Having four levels of FIS is unnecessarily complex and confusing, particularly to overseas visitors. This is rendered more confusing still by individual operatives (ATCs) provide a greater service than agreed with the pilot.*
- A stakeholder who is both an ATCO and a GA pilot, and answered No, wrote: *It doesn't align with the rest of Europe and a lot of foreign pilots have no idea what you mean when you tell them 'deconfliction service' etc*
- An air traffic services provider, who answered No, wrote: *Vectoring in class G airspace in accordance with CAP 774 is extremely difficult and hard work in medium to high traffic levels, especially where the meteorological conditions only just enable VFR to take place such that many aircraft cannot maintain VMC.*

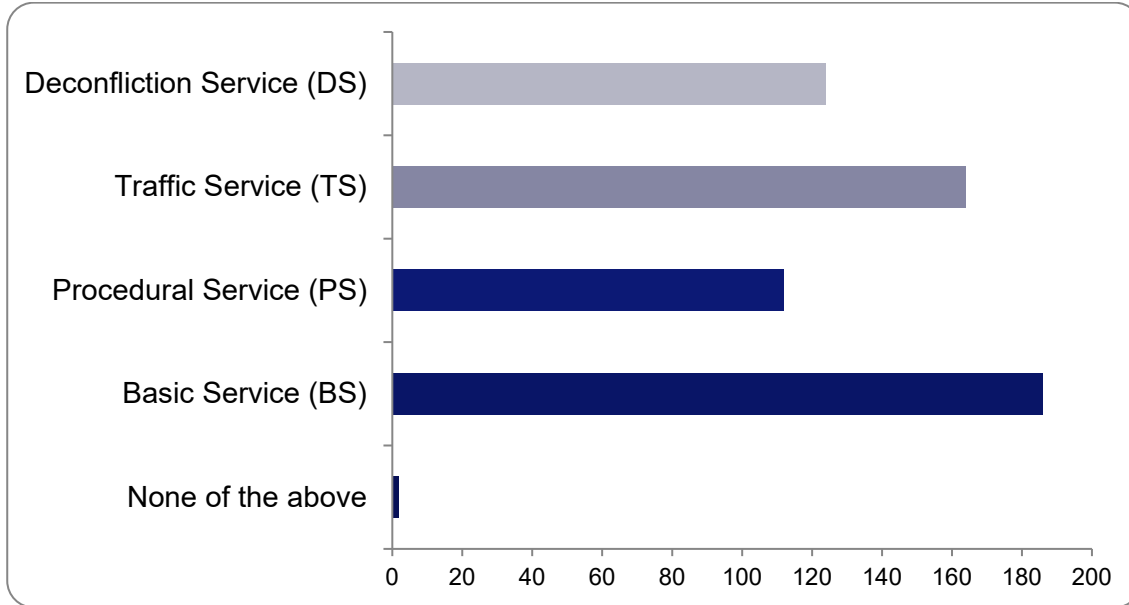
Vectoring to final approach, without any form of airspace classification that would provide protection is risky and subject to late notice avoidance, potentially unstable approaches, and risky for unseen aircraft, such as microlights and gliders that do not always display in primary on modern digital radars and/or aircraft that are not transponding. However, where everybody is partaking and operating correctly under the rules of UK FIS, CAP 774 enables the safety of flight and the risk is ALARP.

- An ATCO, who answered No, wrote: *In my opinion, in the 21st Century, airliners carrying 200-300 passengers should not be flying at speeds up to 250kt, potentially sharing airspace with dozens of other users who are not required to declare their presence or intentions or required to display any form of conspicuity. Even though commercial air transport may be receiving a FIS, extended routings, discontinued approaches and avoiding action should be eradicated whenever possible.*

In the call for input engagement is the line, "...improved alignment allows us to demonstrate that our air traffic services provision is complementary to that of our neighboring states....." Surely the time has come to align ourselves with Germany and other countries who ensure commercial air transport movements remain within a known environment.

Which of the air traffic services, within CAP 774, are you familiar with?

There were 187 responses to this part of the question.



Option	Total	Percent
Aircraft owner/operator	36	19.25%
Pilot	77	41.18%
Aerodrome owner/operator	1	0.53%
Aerodrome personnel	0	0.00%
Deconfliction Service (DS)	124	66.31%
Traffic Service (TS)	164	87.70%
Procedural Service (PS)	112	59.89%
Basic Service (BS)	186	99.47%
None of the above	2	1.07%
Not Answered	0	0.00%

Any comments on the suitability of any of the ATS listed above?

There were 95 responses to this part of the question.

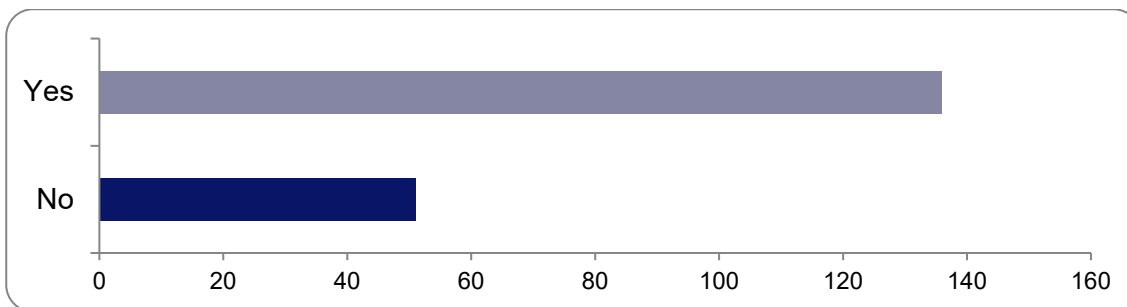
- A pilot wrote: *These services are quite different to other FIS. That gives UK trained pilots additional challenges in flying to EU airspace and vice versa.*
- Another pilot wrote: *I would welcome a service pretty much between the existing Basic and Traffic. I.E. Exactly what you describe on your pre-amble. (My flying is mainly instructional, examining and similar activities in Class G).*
- A pilot wrote: *TS should be a nationally provided service across both UK FIRs (NATS?) and the lowest level of service provided. BS is not fit for purpose.*
- A pilot wrote: *As a private pilot operating both in controlled and uncontrolled airspace I feel the ability to receive either a traffic or deconfliction service from an ATS unit is vital for flight safety outside controlled airspace and I would be opposed to any proposals to diminish the services currently offered outside controlled airspace.*
- An ATCO wrote: *They do not align with foreign services around Europe. As such, many pilots transiting from controlled airspace to Class G are uncertain or even unaware of UK services and the responsibilities of both pilots and controllers.*
- A flight training organisation wrote: *Controller workload / capacity limits their effectiveness. A TS is often not available due to controller work load. There is little point / value in a BS. A BS would have more value if it was always accompanied by traffic alerting appropriate to the environment, aircraft speed / performance etc. And whilst appreciating ATC's duty of care on a BS, receiving occasional traffic alerts blurs the boundary with a TS, and may create false expectations, esp amongst in experienced pilots.*
- A pilot wrote: *As a flight instructor, there is massive confusion, still, over 'Basic Service', especially when a squawk is allocated. The perception of indignant "ATC didn't tell me about that one" in potential airprox shows the continued misconceptions from many GA pilots. I think it would be clearer to revert to something closer to regular ICAO specifications.*
- An air traffic services provider wrote: *Procedural Services could be enhanced if the use of FID was allowed for deemed separations.*
- A pilot wrote: *DS is rarely appropriate for class g operation.*
- A FISO wrote: *Deconfliction service with defined separation limits is probably unnecessary*

- An air traffic services provider wrote: *A controller’s ability to provide vectors and/or levels which are deemed appropriate to mitigate the risk of MAC in an unknown traffic environment are considered essential to MoD operations. Though the concept of a controller providing vectors and/or to achieve planned separation minima outside of controlled airspace is contra to ICAO FIS principles, removal of a “deconfliction service minima” would likely be viewed as a degradation of safety.*
- An ATCO wrote: *DS can be misconstrued by pilots because of phraseology from the CAP413 which does not make it clear that instructions on avoiding action for example are ‘advice’ on achieving deconfliction minima as opposed to instructions which must be obeyed. PS is rarely used these days and my experience suggests that pilots in receipt of a PS do not fully understand that they are not being separated from traffic (known or unknown) which is not participating in the PS.*

Is the current edition of CAP 774 easy to assimilate?

If you answer No, please ensure you explain why and what you would suggest requires improvement.

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	136	72.73%
No	51	27.27%
Not Answered	0	0.00%

If you answer NO, please ensure you explain why and what you would suggest requires improvement:

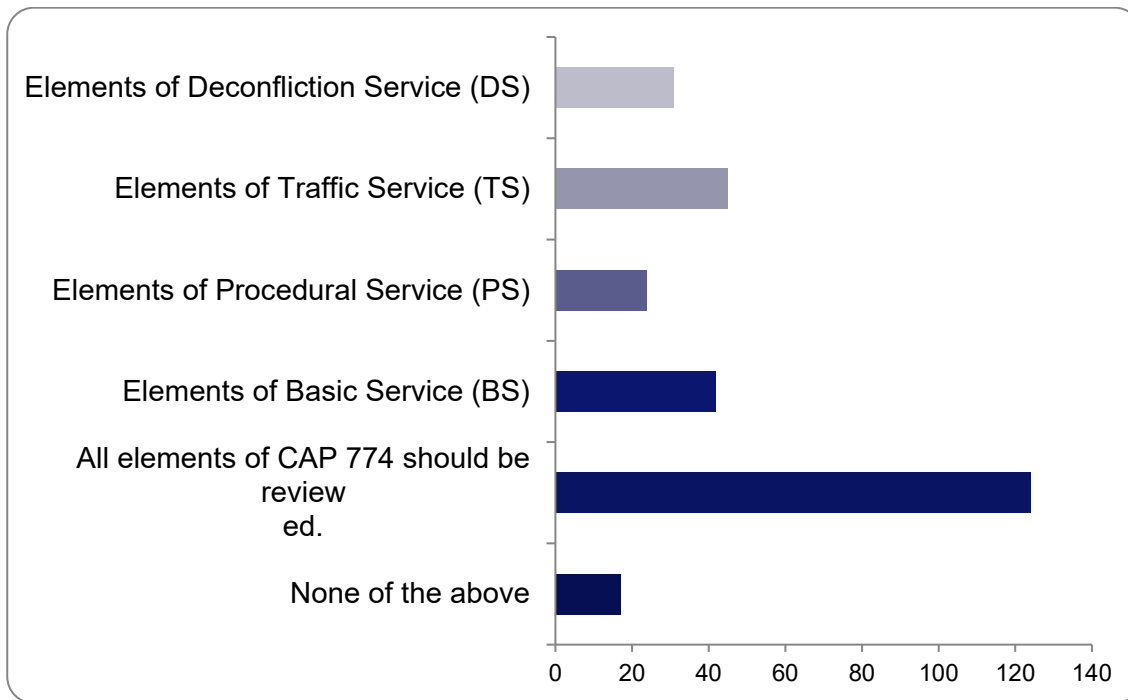
There were 54 responses to this part of the question.

- A pilot who answered No, wrote: *It takes a fair bit of detailed reading. The salient information for my needs is better presented in CAP 1434.*

- Another Pilot who answered No, wrote: *It's alien to foreign pilots - aviation is an international game - we should align to reduce confusion.*

What aspects of CAP 774 should be retained or should all ATS be subject to this review?

There were 187 responses to this part of the question.



Option	Total	Percent
Elements of Deconfliction Service (DS)	31	16.58%
Elements of Traffic Service (TS)	45	24.06%
Elements of Procedural Service (PS)	24	12.83%
Elements of Basic Service (BS)	42	22.46%
All elements of CAP 774 should be reviewed.	124	66.31%
None of the above	17	9.09%

Option	Total	Percent
Not Answered	0	0.00%

Should you wish to do so, please explain why you answered yes or no and offer any suggestions:

There were 84 responses to this part of the question.

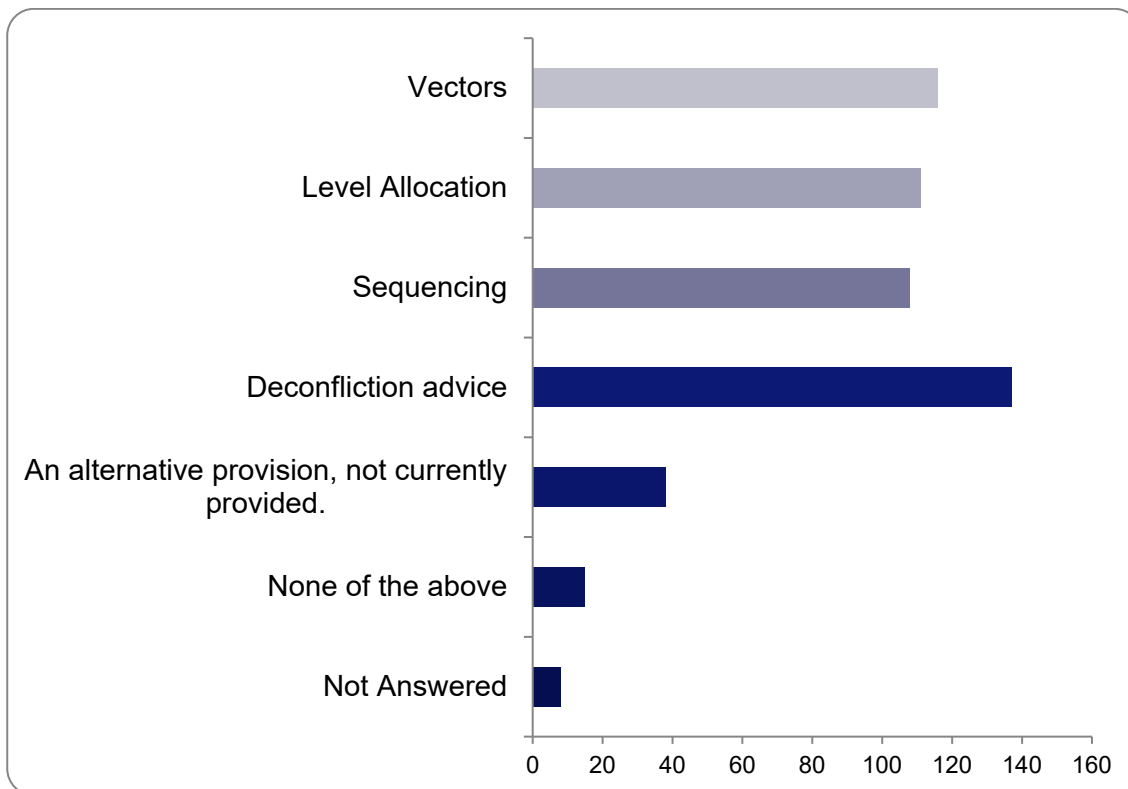
- A pilot wrote: *You need one uniform radar service OCAS, like the US 'Flight following' service. CAS management at airports should be less insular and stop trying to provide the minimum possible service to transiting traffic which has just as much right to use the airspace as departing/arriving traffic. The present de facto system of private fiefdoms needs to be eliminated.*
- Another pilot wrote: *It would be good to return to some well known flight information service names.*

It would be fine to know that at any level of service a controller could provide information more usually associated with a "higher" level of service, perhaps with a notification that it is temporary (and should not be expected to continue).
- A flight training organisation wrote: *BS needs to be beefed up in terms of content and usefulness. Surely our ambition for the UK should be that a surveillance based service is available everywhere, rather than relying the current capricious service coverage (both geographic and temporal). It needs investment. If that were the case, a PS would become unnecessary. I leave it to the experts to determine whether that surveillance should be PSR / SSR or something more sophisticated such as an ADS-B based solution.*
- An ATCO wrote: *The airspace should be reviewed. More controlled airspace leads to a safer environment for aircraft especially around Aerodromes. Transponder mandatory airspace should be increased and the cost of approved transponders reduced to help pilots evolve their aircraft to enhance their service.*
- An aircraft operator wrote: *Clearly the material covered in CAP774 is required. The question is whether the current services described are fit for purpose and whether the names given to them and their alignment with ICAO standards has been properly evaluated. In my view, there is much work to be done on all of those counts.*
- An ATCO wrote: *It works, everybody understands it, why re-invent the wheel (again!)*

- A pilot wrote: *Gold plated solution, one service that can provide information, traffic, and deconfliction instructions if requested.*
- An air traffic services provider wrote: *If the aim is to simplify provided services and/or explain the use of new technology, a complete review of these elements will be required.*
- A gliding association wrote: *This is an opportunity to replace all of these services with ICAO-aligned FIS using the multiple forms of EC (both approved and non-approved) that are now easily available.*

Should the future FIS continue to include elements of the existing UK Flight Information Services? For example, the provision of: vectors, level allocation, or sequencing or deconfliction advice within Class G airspace?

There were 179 responses to this part of the question.



Option	Total	Percent
Vectors	116	62.03%
Level Allocation	111	59.36%

Option	Total	Percent
Sequencing	108	57.75%
Deconfliction advice	137	73.26%
An alternative provision, not currently provided.	38	20.32%
None of the above	15	8.02%
Not Answered	8	4.28%

Please explain your selection:

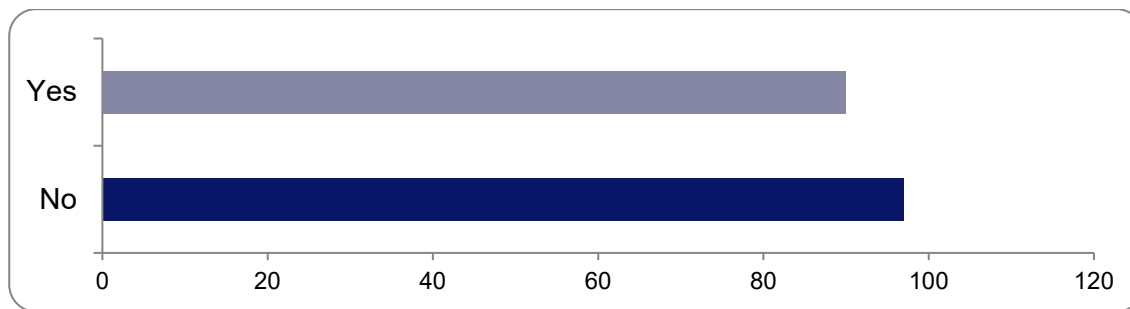
There were 98 responses to this part of the question.

- A pilot wrote: *Revert to ICAO standard services. ATCOs providing services should be empowered to offer advice on headings, levels, traffic. Nothing wrong with advice, provided appropriate phraseology to indicate that it is advice. An ATCO with a radar has more information than I do, it's logical to allow them to use that information to assist me, not tie their hands.*
- A pilot wrote: *I think it should be like in the US - Class E+TMZ from a very low altitude (1200ft) and that way it would be possible to provide a joined service.*
- A pilot wrote: *All these provisions can be useful to the pilot. I'd also appreciate a service that allows airspace transits to be negotiated on behalf of the operating pilot without the requirement to change frequencies.*
- An ATCO wrote: *Increased use of ADS-B surveillance in all aspects of FIS should be provided. I suggest splitting FIS into 2 categories - information and alerting services only, where the pilot does not receive any of the above services, and a higher level of service where licensed controllers can provide suggested routes, vectors, levels etc with or without surveillance to IFR traffic only.*
- A pilot wrote: *Whilst the policy relating to the implementation of controlled airspace remains unchanged, it will be necessary to provide the above services to IFR flights that are forced to operate in IMC without the protection of a known traffic environment.*
- An air traffic services provider wrote: *The way the UKFIS are funded has to be reviewed. ANSPs can provide the services but it is an expensive business. At least LARS units receive a meagre income but some units provide these services without, seemingly, any recompense.*

- An aircraft operator wrote: *Anything other than necessary deconfliction advice is Control therefore inappropriate for Class G.*
- An air traffic services provider wrote: *Very difficult to answer, if any of these are retained there is no alignment with ICAO FIS so why do it? Full alignment or do nothing ie keep the services in CAP 774, would be our preference.*
- An aviation association wrote: *The list of potential additions above would satisfy the requirement set out in the last line of Annex 11 - 4.2.1 "and of any other information likely to affect safety." And we believe all of these things need to be tools in the revised service.*

Are there any elements of UK FIS policy or service delivery that you consider a 'red line', where its retention is, in your opinion, non-negotiable?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	90	48.13%
No	97	51.87%
Not Answered	0	0.00%

Please explain your selection:

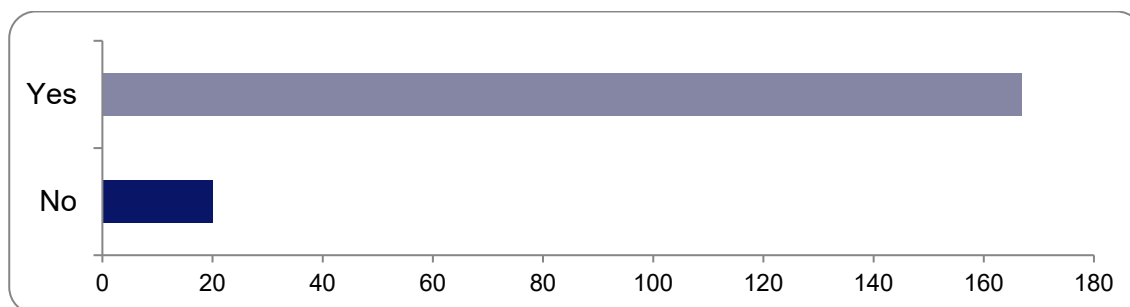
There were 107 responses to this part of the question.

- An aircraft owner wrote: *Basic Service - I consider it appropriate that a 'light touch' ATS should always be available to those pilots that wish to avail themselves of it.*
- A pilot wrote: *The long-standing FIS from Scottish Information is of massive value to GA traffic in Scotland and the north of England and must be retained without being subject to commercial pressures.*

- An air traffic services consultant wrote: *The current FIS blurs the line of responsibility between the pilot and provision of service. The red line for me is that the FIS, as intended by ICAO, is implemented together with a supporting airspace structure. Newquay, as an example, has scheduled services and provides a radar Approach service in Class G airspace. Given the airport's importance to the region, it should be obligated to have a properly defined airspace structure with a CTR and connecting airspace to the route network.*
- A pilot wrote: *Some form of traffic service must be available. What it is called doesn't matter to me.*
- Another pilot wrote: *Naming convention. Please revert to ICAO.*
- A pilot, who answered Yes, wrote: *Deconfliction service. I operate a passenger jet at high speed, often under IMC, outside controlled airspace. There would be no assurance of separation with other traffic if there is no deconfliction service.*
- An air traffic services provider wrote: *Retention of Aerodrome FIS control of ground movement is essential for safe operations at busy AFIS aerodromes.*
- An ATCO wrote: *Pilot responsible for terrain/obstacle/aircraft separation.*
- An aircraft owner wrote: *Free at point of delivery provision of Alerting and Information services to all users.*
- An ATCO wrote: *Provision of surveillance based traffic information and suggested course of avoiding action must be retained because it is an ICAO provision.*
- An air traffic services provider wrote: *Ability to offer Deconfliction Minima to IFR aircraft.*

Are you familiar with the capabilities of a Flight Information Service Officer (FISO) and what they are able to provide in terms of Air Traffic Services?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	167	89.30%
No	20	10.70%
Not Answered	0	0.00%

If you answered YES, please explain which aspects might be changed or improved?

There were 128 responses to this part of the question.

- An aircraft operator wrote: *All FISO should have access to surveillance services.*
- A pilot wrote: *Need to be upgraded so that they can offer European/ICAO style FIS service.*
- A pilot wrote: *Allow and encourage FISO to provide ADVICE on deconfliction and other traffic that they are aware of.*
- A pilot wrote: *Where someone has the appropriate training AND the appropriate information, the service could be augmented with this additional information. For example, if a FISO has training in understanding radar information, they could provide advisory information to pilots. London Information sometimes appears to do this (e.g. when an aircraft is squawking 1177 and is heading towards a Danger Area), and it could be useful, again where workload allows, for a FISO to be allowed to use this information.*
- A pilot wrote: *Remove their ability to control movements on the ground. Add their ability to provide joined up FIS across the country making use of surveillance data.*
- A pilot wrote: *Sequencing and level assignment for IFR traffic outside CAS, to facilitate the woeful implementation of IAPs at AFISO controlled airfields. Traffic information (limited as it may be) based on surveillance data (ADSB etc)*
- A FISO wrote: *Manage provision of some instrument approaches. More ability utilise FIDS.*
- An air traffic services provider wrote: *Familiar with and experienced in Aerodrome FIS, as FISO and authorised unit assessor. Current Aerodrome FIS capabilities are appropriate, with possible addition of explicit ability to suggest or advise actions to pilots in the air where necessary for safety.*

- An aircraft operator wrote: *FISOs should be enabled to provide suggested deconfliction advice based on information derived from a FID fed by ADS-B over WAN connections.*
- An ATCO wrote: *Content with FISO provision as is.*
- A FISO wrote: *Use of RNAV approaches.*
- An aircraft operator wrote: *Get rid of AFISOs. An airfield should be either A/G or ATC - tending towards A/G or even A/A wherever possible. The AFISO role is typically an unnecessary complication and level of bureaucracy. There will need to be a balance here to enable the wider rollout and much more practical implementation of instrument approaches into uncontrolled fields; this element should be viewed in the round (and pragmatically) during this consultation.*
- A flight training organisation wrote: *None. The role of the FISO at busy ADs such as Barton EGCB prevent many accidents. The standard of most FISO units is already poor. We should look to remove AGCS, and improve the overall level of FIS.*
- A FISO wrote: *It would be helpful to make suggestions to aircraft operating within or approaching an ATZ or NOTAMed area. The ability to engage to a greater level with aircraft commanders to avoid runway incursions.*
- Another FISO wrote: *Proposed implementation of Flight Information Displays (FIDs) will help the role of the AFISO significantly in providing improved and more accurate traffic information and avoidance of airspace infringements. At things stand, AFISO's can only give instructions to aircraft operating at an aerodrome up to a runway holding point. Beyond this limit instructions become 'advice and information', hence the phraseology 'Take off at your discretion' or 'Land at your discretion'. In my experience, pilots often assume they require permission from the AFISO to execute certain manoeuvres beyond the holding point limit and I for one would like to explore increasing the AFISO area of responsibility to an area akin to the ATZ boundary.*

What do you understand to be the main differences between air traffic services delivered by an ATCO and a FISO in the UK?

Please explain which aspects might be changed or improved in the future?

There were 158 responses to this part of the question.

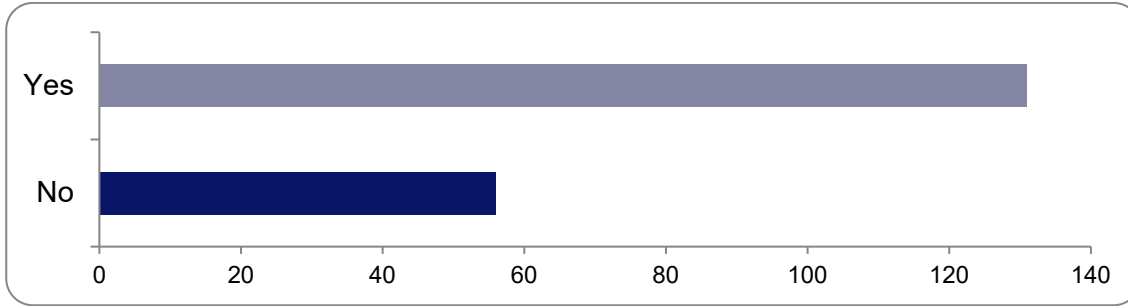
- A pilot wrote: *ATCOs can use radar to identify traffic and provide specific traffic information. FISOs can only provide a Basic Service and can only give generic traffic information. Expanding FISO ability to use surveillance information would be valuable.*
- A pilot wrote: *No idea what the difference is.*

- A pilot wrote: *ATCO - instructions in the air and on the ground, subject to the class of airspace and the service being provided. FISO - information only in the air, instructions on the ground, landing and take-off being advisory and not instructions.*
- An aerodrome operator wrote: *A FISO is unable to control an aircraft from the point of the aircraft passing the holding point to be used for departure. Information is then provided to aircraft on frequency to allow their flights to be conducted safely and efficiently. The current level of service provided by an AFISO suits the complex traffic operation of the aerodrome. Further improvements should be focused on improving the situational awareness for the AFISO to allow for improved efficiency and accuracy when passing traffic and pertinent information.*
- A pilot wrote: *A FISO may not issue instructions to aircraft in flight (other than in very limited circumstances). This hampers the use of instrument approaches with AFISO rather than ATC and we should be making it easier for airfields to adopt these.*
- An aviation training organisation wrote: *Give FISOs 'control' over their own runways, as they already have with the rest of the manouvering area.*
- A pilot wrote: *ATCOs give instructions whereas FISOs provide advice and instructions (on the ground only). Having three different potential types of service at small aerodromes is potentially confusing but a FISO service is considerably better and safer than air ground radio.*
- An ATCO wrote: *If ATCOs work aircraft in controlled airspace at controlled airfields and en-route centres, providing an air traffic control service, I can envisage a FISO providing an information-only service to aircraft in Class G.*

Should elements of ICAO Doc 4444 PANS-ATM be better aligned with, or emphasised, within the future UK FIS?

Which elements of ICAO Doc 4444 PANS-ATM could be better aligned with, or emphasised, within the future UK FIS?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	131	70.05%
No	56	29.95%
Not Answered	0	0.00%

Please provide detail on why you have selected your answer:

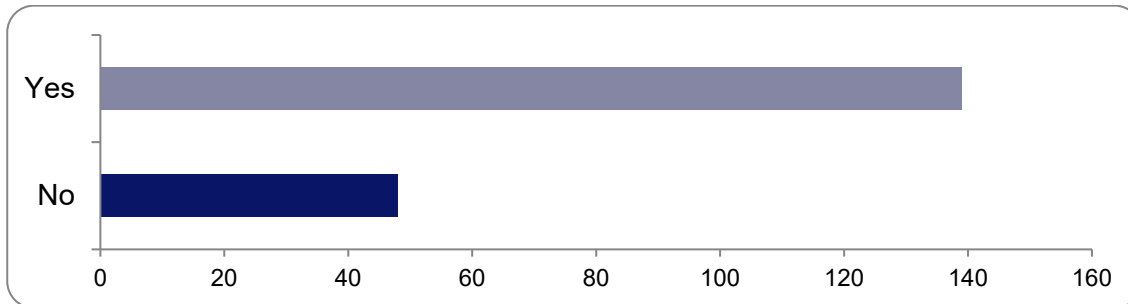
There were 140 responses to this part of the question.

- A pilot wrote: *Aviation is an international transport, pilots should not have to grapple with significant differences when flying from UK to EU.*
- A pilot wrote: *Increased standardisation of rules and procedures would benefit National pilots operating overseas and foreign pilots operating in UK airspace.*
- An ATCO wrote: *Many pilots from outside the UK fly in UK airspace, and many pilots from the UK fly in foreign airspace. The closer the services they receive are aligned the safer their flying becomes.*
- A pilot wrote: *I do not profess to have a detailed understanding of PANS-ATM, however in my limited experience, the closer all countries are to a common standard (whatever that may be) in terms of practical implementation and operation, the easier it is for all pilots to access and use the service, and thus it represents an improvement in safety, which benefits everyone. On a recent flight, involving 4 European countries in a single leg, the standout in terms of procedural differences with the FIS was the UK. While the others differed slightly, the service to a VFR flight crossing Europe was reasonably consistent. The standout in terms of proactivity of the FIS would be Germany, with a service that felt extremely similar in practice to a US flight-following service.*
- A pilot wrote: *This is an internationally agreed document, to which the UK is a signatory.*
- An air traffic services provider wrote: *4444 is a world wide standard and as such the U.K. should be better aligned with it. But that does not mean we can not publish differences to suit our needs.*

Should the CAA simplify the operational delivery of UK FIS?

How could the CAA simplify the operational delivery of UK FIS?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	139	74.33%
No	48	25.67%
Not Answered	0	0.00%

Please explain your selection:

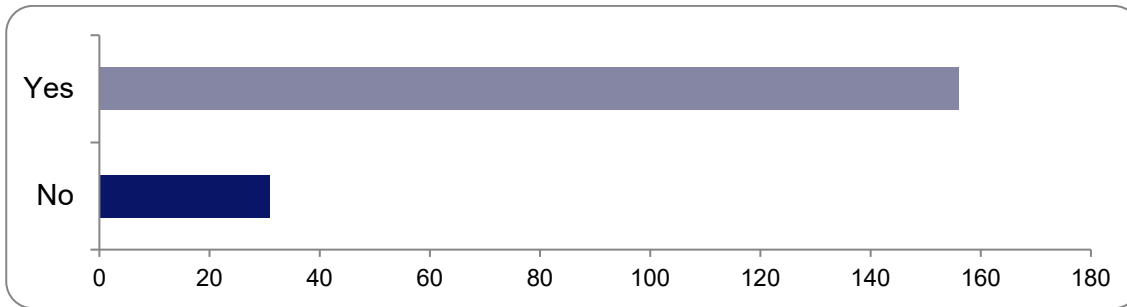
There were 145 responses to this part of the question.

- A pilot, who answered Yes, wrote: *In the past there were enough military airfields providing LARS to cover much of the country. Now there are too few LARS providers and for civil ANSPs commercial pressure limits their propensity to offer LARS.*
- A pilot, who answered Yes, wrote: *Divide Class G airspace into more manageable sectors and dedicate FISO to each. Compare London Information (huge and unwieldy) to France system of SIV.*
- A pilot, who answered Yes, wrote: *The UK FIS service is fragmented between different providers capable of providing different service levels. A simplified single point of contact able to 'handover' aircraft to adjacent sectors and provide clearances and control.*
- An ATCO, who answered Yes, wrote: *It is often unclear to pilots in Class G who the best service provider to contact is. E.g. in large areas of N Ireland, at typical VFR levels it is difficult to make contact with the Scottish FISO's / controllers, and then it becomes a choice between contacting local airfields, or using dedicated glider or microlight or similar frequencies and not talking to any FIS provider.*

- An ATCO, who answered Yes, wrote: *In concert with airspace and a single source ANSP. Multiple ANSPs, coupled with a fragmented LARS system that is full of gaps in coverage, (military Mon-Fri Office Hours only). Identifying 'Super Units', funded for the service provision, that operate Radar 0600-2359 (or similar) should be part of the process of reviewing / simplifying UK FIS delivery within the UKFIR.*
- An aircraft operator, who answered Yes, wrote: *Terminology of initial contact. To the foreign pilot it makes no sense.*
- A pilot wrote: *I've answered yes, but it's a nuanced question in that there isn't really a great deal of Area FIS provided by anyone other than London and Scottish Information. If, indeed, any at all. So in some ways, it's already very simple. In other ways, it could be simplified further by having a common standard to which FIS will be provided - i.e. clearer when FIS+surveillance is being provided compared to FIS-. I'm not advocating for a return to Flight Information, Radar Information and Radar Advisory, as these were further from the ICAO standard than present, but perhaps an upgrading to London Info to provide FIS+ as standard rather than FIS-.*
- An ATCO, who answered Yes, wrote: *It's fine as it is.*
- A pilot wrote: *Within the limits of my LAPL licence and the area I live in (Lincolnshire) I find the delivery of FIS is very good. A lot of it comes from the RAF's Lincolnshire TATTC.*
- An aircraft operator, who answered Yes, wrote: *What's wrong with using terms like, Flight information service, VFR radar service, IFR radar service. With straight forward definitions everyone can understand.*
- A FISO, who answered Yes, wrote: *The present system works. Do not simplify or worse over complicate that which UK pilots understand.*

The AMS describes the digitisation of FIS provision through the use of FIS-B and TIS-B technologies and the concept of the 'connected aircraft'. Should the CAA use technology to improve the delivery of FIS, and if yes, how?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	156	83.42%
No	31	16.58%
Not Answered	0	0.00%

Please explain your selection:

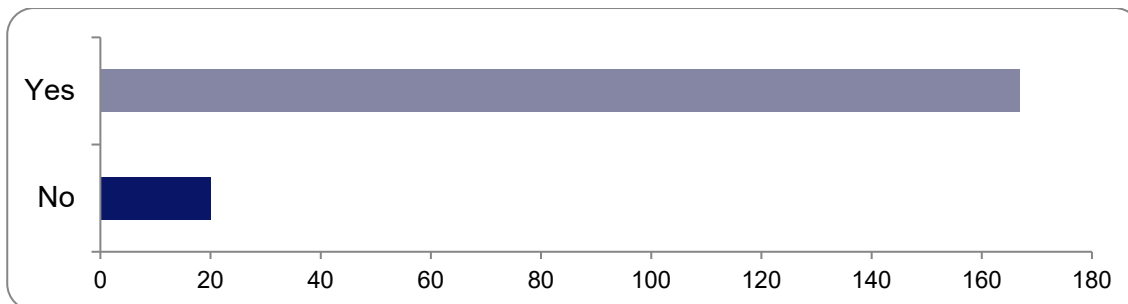
There were 154 responses to this part of the question.

- A pilot wrote: *I'm happy to invest money for my aircraft to become more visible to ATC and others - but need leadership on what technology the CAA want us to use.*
- An ATCO wrote: *FISOs able to use surveillance derived information so that LARS units don't have as much pressure placed upon them.*
- A pilot wrote: *FIS-B and TIS-B should be combined with some form of mandatory EC.*
- A pilot wrote: *Use of electronic conspicuity aids must not become mandatory.*
- A pilot wrote: *Many GA aircraft do not have this technology and the cost of installing it would be prohibitive.*
- An ATCO wrote: *The current use of ADS-B technology has been far too slow to roll out, with mixed messages where pilots were encouraged to obtain and use it, yet the bar for ATC or AFISO units to use it has been set very high, with the few approved systems being very expensive and with very restricted use cases. Any system that can provide increased traffic information to FIS providers or pilots should be encouraged.*
- A pilot wrote: *The CAA should enable the best use of available technology in accordance with the SARPS whilst ensuring that aircraft without the technology are not disadvantaged or at risk as a result.*

- A flight training organisation wrote: *Implement it to the fullest extent. ADS-B out and in should be mandatory for all aircraft flying IFR and entering controlled airspace, similar to the US. TIS-B and FIS-B are excellent systems giving far greater situational awareness to pilots. Please, please implement this.*
- A pilot wrote: *Send TIS-B into our cockpits - my aircraft is equipped for it.*
- A pilot wrote: *I would support this. However, *for the love of God*, please do it more sensibly than the implementation of ADS-B has been in the UK. In that case, the weakness of the CAA in being reluctant to mandate and enforce a firm technical standard has led to a proliferation of various different solutions; anything from commercial grade, ADS-B Out to a wide array of portable, sometimes home-assembled devices, to FLARM for gliders, and so on and so on. Often these systems are not entirely interoperable, often they use different frequency ranges to other countries or ICAO regions, and the portable devices suffer from blind spots.*
- An ATCO wrote: *The more information available to users and providers, the better. It would also give providers capacity to provide better, more relevant flight information, but also allow users significantly more autonomy while under the receipt of such services.*

Do you think it is important for a verbal agreement to be made stating the type of service an aircraft is in receipt of? For example, ‘....leaving controlled airspace, Flight Information Service.....’.

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	167	89.30%
No	20	10.70%
Not Answered	0	0.00%

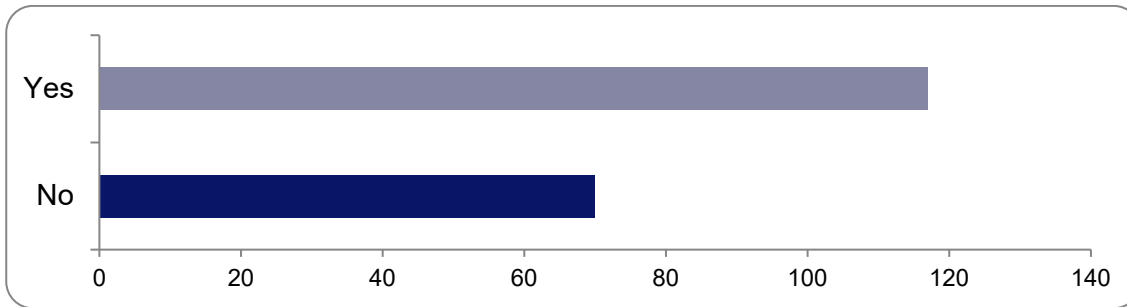
Please explain your selection:

There were 150 responses to this part of the question.

- A pilot, who answered Yes, wrote: *Pilot must understand what service (if any) they are in receipt of and the limitations of that service.*
- A pilot wrote: *If the current service levels are retained, yes. But if we simplify then no.*
- A pilot, who answered Yes, wrote: *There should be no ambiguity as to what service the pilot is receiving.*
- A pilot, who answered No, wrote: *The rest of the world manages without statement of and readback of service type. Why does the UK think it knows best?*
- An ATCO, who answered No, wrote: *The change in service for many pilots is operationally minimal, e.g. for an IFR flight changing from a control service inside controlled airspace to a deconfliction service outside has no effect on how they operate, likewise for a VFR pilot leaving controlled airspace and continuing on a basic service does not change how the flight is operated. A simple statement to advise pilots when entering or leaving controlled airspace would in most cases be sufficient.*
- A pilot, who answered Yes, wrote: *Best to have a confirmed agreement on the level of service in use - but in the future that could be a numeric or coloured light indicator in the cockpit?*
- A pilot, who answered Yes, wrote: *Only if the service is downgraded.*
- An ATCO, who answered Yes, wrote: *It is essential that the type of service is clear at all times both for the purposes of aviation safety, but also for confirming actors' roles & responsibilities particularly with regards to terrain clearance and collision avoidance.*

What changes, if any, may be required to the UK airspace structures and classifications to facilitate the provision of the future UK FIS?

There were 187 responses to this part of the question.



Option	Total	Percent
Yes	117	62.57%
No	70	37.43%
Not Answered	0	0.00%

Please explain your selection and offer any suggestions:

There were 145 responses to this part of the question.

- A pilot wrote: *I think there should be Class E + TMZ from 1500AMSL and above.*
- A pilot wrote: *Just provide a better service. If that happens, the structures and classifications are less important. The structures and classifications only bother non-commercial traffic because coverage is poor, service patchy, and airspace access difficult.*
- An ATCO wrote: *More flexible use of controlled airspace, including expanding CTAs where ANSPs identify a need to protect commercial traffic but also making it easier to hand back pieces of airspace which are under utilised.*
- An ATCO wrote: *Use of Class E airspace (TMZ) under Terminal Control Areas (but not within Control Zones) in the airspace from a defined lower limit (eg 1500ft amsl) up to 5000ft amsl.*
- An aircraft operator wrote: *Ensure the airspace is as simple as possible. Farnborough layout is confusing and dangerous with much funnelling of aircraft.*
- A pilot wrote: *Introduce Class E from 2000' AGL upward, UK wide with corresponding ATC radar control.*
- A pilot wrote: *I believe the current airspace classifications work. However, the service within the classifications can be enhanced.*
- An ATCO wrote: *Class D airspace surrounding all MOD aerodromes for better protection of activity in the critical stages of flight.*

- An aircraft operator wrote: *The single most important improvement would be a coordinated lower airspace design team to design the UK's lower level airspace (say below 10,00ft, but could be a different number) rather than the mish-mash hotch-potch of local changes focused on one service provider. From my perspective when designing airspace structures and services it is essential that the needs of all airspace users are taken into account, commercial, military, business, training, recreational, powered and unpowered. This does not happen at all at present. Those who can pay usually get what they want and others have to stay clear (and are threatened with a big stick if they do not). I would like to see one centrally funded air traffic service provider who uses all technological tools available to provide access to airspace for those who want to invest in technology, but that should also mean those aircraft who do not have the technology (or cannot fit it) should not have to travel many miles out of their way or be funnelled into high traffic (high risk) corridors.*
- An ATCO wrote: *All commercial airfields should have controlled airspace.*
- An air traffic services provider wrote: *To incorporate future airspace users, such as UAS/BVLOS ops etc*
- An air traffic services provider wrote: *Establishing the appropriate airspace structures is the first challenge of the AMS, which needs to be done before flight information services are defined. It is difficult to fully assess the potential flight safety impacts of the current CAA FIS Proposal without further understanding how the UK's Airspace Modernisation Strategy (AMS) will look; particularly the future construct of Class D and G airspace. A review of the whole construct will need to be considered with all the key stakeholders involved. Updates to FIS cannot be made in isolation. Modernisation of UK airspace structures is required to reflect current and forecast user requirements, whilst factoring in the opportunities that could be realised with access to existing and emerging technologies. This will be challenging as there is no one size fits all answer; it will inevitably be a compromise that considers the needs of all airspace users. The current UK airspace structure (with class G up to FL195) doesn't support the proposal in a change to FIS rules that erodes deconfliction separation minima. Changes to ICAO FIS without requisite changes to airspace could seriously degrade ATM safety and freedom of manoeuvre for the military. Significant concern is raised that a barrier to Mid Air Collision is being removed without any mitigation in place.*

Lower Airspace (Radar) Services. What is your opinion on current availability, delivery and service levels of UK Lower Airspace Radar Services (LARS)? From your interaction with LARS, have services been provided by the ATS provider as expected? How might the Lower Airspace Services (LAS) be delivered in the future?

There were 176 responses to this part of the question.

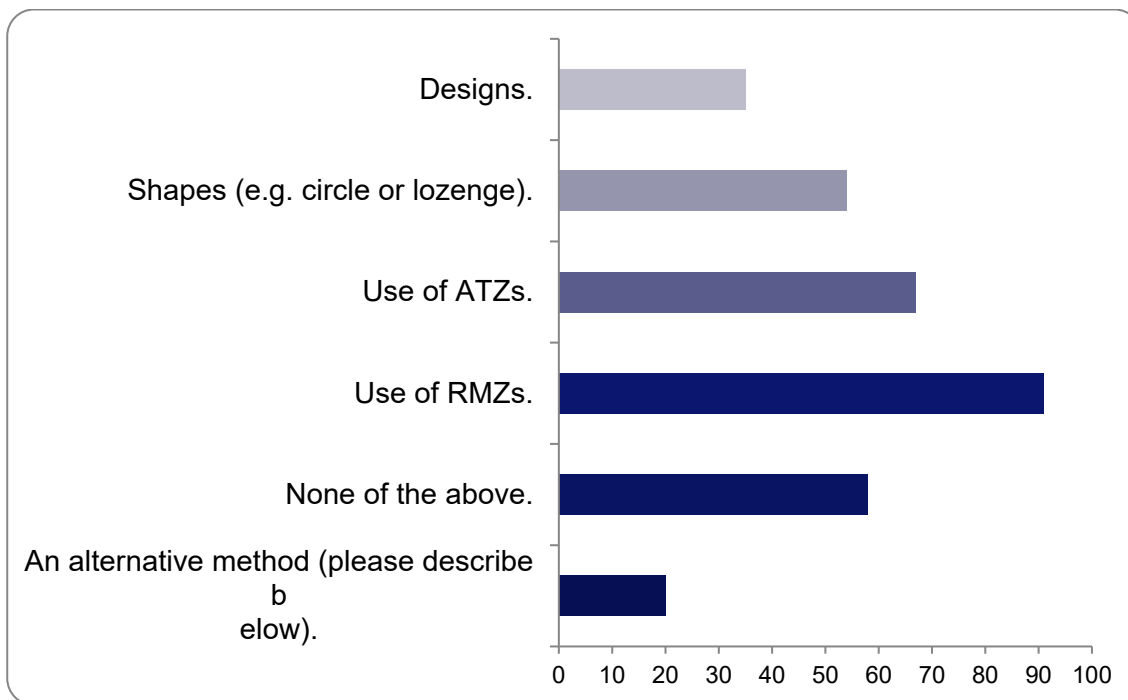
- A pilot wrote: *Good service, could do with more resources as they are usually overloaded and at some units dealing with IFR arrivals and departures that require great attention whilst also dealing with basic service requests.*
- A pilot wrote: *It's abysmal and unpredictable, particularly military units who close unexpectedly. NATS units shy away from it to save £££ and there doesn't seem to be a real desire from non NATS units to provide it.*
- An aircraft owner wrote: *I don't use LARS much as being largely military, they work M-F 0900-1700 and I often fly at weekends or times when the military are not operating. It would be nice if LARS was available more consistently, say 0800-2000 seven days a week.*
- An aircraft owner wrote: *LARS was previously extremely valuable when most provided by military units. With the decline in RAF bases fewer LARS are available and less useful. LARS could be combined with subdivided FIS into smaller Flight Information Sectors all supported by surveillance.*
- A pilot wrote: *LAS should be centralised with details passed from unit to unit. Often LARS units suffer from limitations due to controller workload and are unable to provide the service requested. LARS services offered by military ATS units often have limited operating days or hours often being closed on weekends when there's greater GA activity.*
- An ATCO wrote: *It places a large drain on commercial ANSPs with not enough ATCOs to provide an effective service especially on a summers day. Too many pilots believe they have an instant right of access to CAS even when they can hear the frequency is busy.*
- A pilot wrote: *It should be better joined up and available everywhere. There is too much free calling and squawk code changing. Flight details need to be exchanged through all units and use of one squawk code per flight. US Flight Following is a good example to follow.*
- A pilot wrote: *These are excellent services and it would be good if the coverage could be extended to areas which are not currently covered.*

- A flying training organisation wrote: *Its great, but with the closure of military airfields its becoming patchy in some areas. ATC units like Bristol should not be allowed to opt out. If they want to be a commercial Licenced airport with controlled airspace they need to provide LARS outside of it.*
- A FISO wrote: *LARS has been disappearing to such an extent over recent years that it is next to useless at weekends and only available business hours for most civil and military units. Using AFISO's with FIDs on a more regional basis would make a lot more sense.*
- A pilot wrote: *When you need a traffic service most - i.e. when it's most busy - you are least likely to get it due 'controller workload'. FIS should be UK wide with smaller sectors.*
- An ATCO wrote: *I once had 27 speaking units...9 TI and the rest BS. The service I was able to provide to TI was severely reduced and was not practicable. If LARS is to an advertised service then its provision needs to be properly funded and provided as a separate service, as opposed to 'tagging' it onto an Approach controllers duties.*
- An ATCO wrote: *LARS cover has noticeably diminished in the UK over the last decade. There have been several situations in the last few years where there has not been another suitable LARS or surveillance Unit for the ac to talk to and they have had to fly VFR in diminishing light or challenging weather conditions. Western Radar is a good example of how LARS can be delivered by one unit for large areas in the UK.*
- An ATCO wrote: *Keep the current provision but fuse the radar data from the NATS, Civ Terminal & Mil/Aquila to suck up radar/WAM data and provide a fused picture to a central location. Provide a LARS service using that data at locations that don't currently have it, a bit like London FIS but with Radar.*
- A FISO wrote: *Use of none circular ATZs makes perfect sense to reduce a lot of blocks of airspace, but changing to non-atz's is going to cause a lot of confusion and remove the perceived protection an ATZ gives.*
- A pilot wrote: *The shape of future RMZs might be best tweaked to encompass the circuits that may be flown to any runway. Thus, a lozenge for an airfield with one single runway, or a rounded triangle (or more complex shape) where there is 2nm from any threshold or runway centreline. My question would be: will the RMZ mandate a pilot only to *carry* a radio, or to call an airfield for relevant safety information prior to entry, as is the case for ATZs now? I would hope to avoid a situation where removal of ATZs results in pilots thinking that it's adequate to fly through an RMZ without calling the relevant agency.*

- A FISO wrote: *A standard design should be developed that would suit the majority of licensed, uncontrolled aerodromes. However provisions should be build in to the process that allows a streamlined process aerodrome operators to adjust the design to suit. In addition, inline with FUA, Operators of aerodromes that may need temporary, periodically larger RMZs to encompass differing activity should have a process to build the design and have the ability to activate the design when needed. Versus making a new application on each occasion.*

The AMS proposes, *inter alia*, replacing ATZs at uncontrolled aerodromes with RMZs. With regards to UK airspace constructs, do you have any comments upon:

There were 187 responses to this part of the question.



Option	Total	Percent
Designs.	35	18.72%
Shapes (e.g. circle or lozenge).	54	28.88%
Use of ATZs.	67	35.83%
Use of RMZs.	91	48.66%

Option	Total	Percent
None of the above.	58	31.02%
An alternative method (please describe below).	20	10.70%
Not Answered	0	0.00%

Please provide detail on why you have selected your answer:

There were 145 responses to this part of the question.

- An aircraft owner wrote: *Keep shape and design the same. RMZ while sounding good would limit non-radio traffic, not that there is much of that these days. It is about time it was made mandatory that all aircraft must have a radio, then RMZ could be implemented. Impact of making mandatory Radios for all aircraft would be minimal.*
- An air traffic services provider wrote: *Traffic density in and around ATZs/RMZs should be the deciding factor on Design/shape and dimensions not solely based on Runway Lengths e.g. a Standard 3nm ATZ/RMZ would be more preferable potentially more rectangular or box shaped. RMZs is the ideal however TMZ inclusion within this or ADS-B Mandatory Zones.*
- A flight training organisation wrote: *There are some airspace users who don't use radio, commonly the lighter end of aviation (sub 600Kg). This would in effect require a change to mandatory use of radio (something I don't object to but I imagine others will).*
- A pilot wrote: *Circles are simpler; ATZs are helpful for protecting circuit traffic and should be maintained.*
- A pilot wrote: *RMZ's and TMZ's in proximity to airfields would help ensure aircraft operating in the area have the best awareness of other traffic operating locally.*
- A pilot wrote: *It doesn't matter so much what you call it, more how it operates and what the rules are. ATZs are de facto RMZs now, so changing the name doesn't achieve much. What is problematic is the concept of an RMZ where two-way communication must be established before entering. This is de facto controlled airspace, since an ATSU can tactically limit access to the airspace by responding "standby" or not responding at all. A better implementation of an RMZ would be simply: "this is the frequency, you must be listening out if you are inside".*

- A pilot wrote: *Provided there is fallback for aircraft without a radio (e.g. PPR for a timeslot, so that a radio operator may inform other aircraft of the non-radio aircraft) then I don't have an issue with this proposal.*
- An aircraft operator wrote: *It is vital that any associated airspace change process is simplified and affordable for ANSPs.*
- An aircraft operator wrote: *Preferably RMZ+TMZ (or ADS-B) at all airfields. Mandatory electronic conspicuity would be a step change in aviation safety.*
- An ATCO wrote: *Uncontrolled aerodromes by their nature have reduced traffic levels and generally general aviation. In these situations an ATZ is sufficient to provide a level of protection. An RMZ should be encouraged for controlled airports as an ATZ replacement in place of Controlled Airspace. ATZ sizes should be considered for the type of operations and not based on runway length.*

What other opportunities to improve UK FIS regulation, beyond those suggested in this Call for Input, would you like to see progressed?

There were 90 responses to this part of the question.

- A pilot wrote: *Allow the "new UK FIS" to provide initial provisioning and deconfliction of traffic using the IAPs at the airfields without ATCO.*
- A pilot wrote: *Just provide a uniform and joined-up radar based system across the whole UK.*
- A pilot wrote: *Privatisation of ATS has led to an unwillingness for commercial ATSU's to provide ATSOCAS and has left gaps in FIS provision. (Again, FIR wide FIS simply can't provide this.) Commercial ATSU's wanting CAS need to be held to agreements to provide services to transiting traffic and nearby OCAS.*
- A pilot wrote: *Better ppl training, fis should be a tool for the pilot, not a police and control service. To active this, pilots should be better trained initially, and where minor interactions occur, a proper system of high quality retraining implemented.*

- An aircraft operator wrote: *Better training for ATCOs and pilots. Much of the UK's Class D airspace is inappropriately managed by controllers. VFR flights are 'over controlled' and pseudo-separated from IFR flights where no separation is actually required. Equally, many GA pilots are very poorly trained in RT and ATC procedures and don't understand how to use them correctly. Digital sharing of flight data to omit the need for the lengthy, cumbersome and often verbose 'pass your message' instructions could improve this.*
- An ATCO wrote: *The use of an RMZ to replace the present Military ATZ system retaining the ATZ as standard for all civilian and military aerodromes. The present system of the airspace within 5nm of a military airfield as being non mandatory is outdated and should be replaced by an RMZ especially where there are iaps established for that aerodrome; this applies equally to civil aerodromes.*
- An air traffic services provider wrote: *I recommend that the CAA review what Approach Procedural is in the year 2024, by way of surveying all ANSPs that provide such a service and finding out what they use it for and why. Many elements of the service have been the same for 40+ years and do not fully align with the airspace modernisation programme. furthermore, the service is only provided by a handful of ANSPs in many cases purely as "insurance" in case the radar fails.*
- An air traffic services provider wrote: *we recommend the focus first and foremost be on airspace classification policy and then the services are adjusted to address the residual FIS needs. Therefore we recommend an in depth CAA review of ICAO and regional ATM documents (e.g. ICAO Manuals etc) beyond just the basics of Annex 11 and PANS ATM. We also recommend review of processes for airspace classification allocation and FIS provision applied in other States not least our European neighbors.*

Chapter 4

Next steps

It is important to the CAA that everyone has an opportunity to voice their opinion on matters that could affect them. For this reason, we asked for comments on this proposed change process. We welcomed comments from every sector of the community. This includes the general public, government agencies and all sectors of the aviation industry, whether as an aviator, aviation consumer and/or provider of related products and services.

So, what next? We will conduct deeper analysis on the responses. We have already commenced the safety assurance process to make sure that any future changes are delivered safely. We shall then develop technical solutions and options, prior to a **subsequent full stakeholder consultation**. Thereafter, we shall need to work on aviation-wide training, implementation, deployment, and a post implementation review.

Lastly, we are very mindful of the need for synchronicity. The AMS offers a number of future changes and improvements, and the alignment of UK Flight Information Services with ICAO FIS is but one of them; we very much acknowledge the ability and capacity of all stakeholders to absorb these changes and will continue to proactively engage to better understand these challenges.