

ICB

Industry Consultation Body

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Mr Maurizio Castelletti
European Commission
DG Mobility and Transport (MOVE)
Head of Unit E2 - Single Sky and modernisation of Air Traffic Control
Rue De Mot 24
1040 Brussels
Belgium

8 November, 2016

Subject: Data link implementation

Dear Mr Castelletti,

Dear Maurizio,

I write to you regarding the implementation of the final report of the ELSA study published by the SESAR Joint Undertaking and the appointment of the SESAR Deployment Manager as the Datalink Services Implementation Project Manager. The ICB welcomes the steps that the Commission have made in maintaining momentum towards the ambitious, yet desirable, timescales for data link implementation, as set out in Regulation (EU) 2015/310. The ICB and its members look forward to actively contributing to the workshop on 24 November, and this letter highlights key areas to address.

Experience has shown that enactment of the technical Implementing Regulations has failed where there is a lack of proper programme management to drive execution and to resolve problems as they arise. The limitations of state-by-state implementation, in the context of a pan-European, end-to-end data link requirement, combined with potential cross-border infrastructure consolidation, also points to needing an appropriate implementation framework.

The recent appointment of the SESAR Deployment Manager is a major step towards this. However, the other elements of ELSA's recommended network implementation and oversight framework also need to be addressed. This includes establishing and empowering a performance and spectrum coordination function, and end-to-end certification and oversight function. We request that progress on these other ELSA recommendations is reported at the workshop.

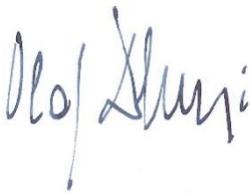
Furthermore the word 'empower' in the ELSA recommendations is crucial. The ICB believe that it is vital that the appointed Project Manager must be able to more than simply monitor and coordinate implementation. Such an approach will not adequately mitigate the risk of fragmentation, delay and/or failure. The ELSA recommendation is also clear on this point, referring to the need to 'steer implementation' and to be 'properly authorised'. The SESAR Deployment Manager, in its new role, must be furnished with the decision-making authority to fulfil its roles as project manager and architect.

Of course the Commission still have a major role in successful datalink implementation, not least in ensuring timely compliance with the regulation, particularly if there is reluctance. An option is to empower the SESAR Deployment Manager to make strong recommendations to the Commission in this regard. We request that the specifics of the authorisation of the SESAR Deployment Manager, and the Commission's ongoing role, are set out at the workshop.

Finally, the current focus is on ATN/VDL2, but the ELSA findings and recommendations are clear that other technologies are needed. Alternative communication means for AOC in the airport domain are a priority, and future datalink technologies are needed from as early as 2025. Given the SESAR Deployment Manager's current mandate, the governance and implementation framework for these complementary and next-generation technologies is not clear to us. As part of a coordinated and integrated approach, a longer-term *programme*, rather than *project*, may be preferable. Again we request that the long-term governance of the Commission's datalink strategy is addressed at the workshop.

In summary, recent developments are welcome and are promising, but the detail of the implementation framework is crucial to its success or failure. Europe cannot afford to fail and time is of the essence. We look forward to the workshop and hearing answers to the key questions identified in this letter. You can also be assured that the ICB remains at your service on this topic.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Olaf Dlugi', written in a cursive style.

Olaf Dlugi
Chairman,
Industry Consultation Body