Performance Review Body
designated by
the European Commission

Stakeholder comments on RP2 EU-Wide Targets – Indicative Performance Ranges

Informal consultation February 2013

Comment Register

Country	Europe
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The purpose of this comment register is to gather Stakeholders comments and proposals on the target ranges for the KPIs proposed in the and not the propose changes / amendments to the KPIs themselves, for which other for a have been established.

Any proposed modification to the target ranges should be quantified, if possible, in order for the proposals to be understandable and unambiguous (e.g. it is not enough to state “lower” or “higher” but also the “how much” is needed).

Please fill in the comments in the area as you feel appropriate. If you have no comment you may leave the field blank. If you think the question is not relevant for you please select "N/A" in the combo box "Yes/No".

Once finished, please press the “Submit form” button at the top right of the page to send the form to Mr. Massimo Bernacconi (Massimo.bernacconi@eurocontrol.int) no later than Wednesday 20 February 2013

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METHODOLOGY AND APPROACH	
Q01: Do you support the scenario based approach introduced in this section and used throughout the document?	**Yes/No**
If not, please specify why and what are your proposals	No

The 3 scenario model is not supported and does not reflect the reality of the sector.

The name "MINIMUM" scenario mislead all the stakeholders. It is not a minimum scenario based on business as usual. It is already very ambition, more ambition then RP1, ignoring also the reality of the RP1 in progress, the difficulties, the unreliability of the middle term traffic forecast.

The minimum scenario have to be review as well as it does not include fact and evidence from the RP1 experience and ignore the political decision of Member States on RP1 target. It is the only scenario based on figures and calcolation.

The stretch, accelerated stretch and accelerated stretch by 2025 are ridiculous. They are just a provocation to set higher expectation, to arrive to an higher compromise. They are based on Political vision (HLG-High level Goal) that does not find any justification in the CA market reality. These HGL are unrealistic and unnecessary in the light of the updated middle term forecast. Moreover experience shows that Middle Term forecast is unreliable. So which is the scope to create a performance scheme based on LONG term forecast (base for the accelerated stretch scenario). Improvement identified in the stretch and accelerated stretch scenarios do not have any base nor evidence. Are just estimations based on structural or technological changes that are absolutely not defined.

Q02: Do you consider that PRB has taken into account of all the relevant tools and information you would expect being considered in the formulation of proposals for EU-wide targets?	**Yes/No**
If not, please specify those you would like to be included	No

PRB missed the learning process from RP1 experience.
PRB did not consider the reality of RP1, the difficulties encountered by ANSPs, the political compromise for RP1 targets and the fact that middle term forecast is unreliable.
We cannot continue to base the middle term targets on forecast.
We should find another solution where targets must be flexible and able to be updated in line with the reality of the traffic.

Q03: Do you have evidence, facts or views in relation to the achievable level and speed of performance improvements?	**Yes/No**
If yes, please provide them.	Yes

The last ten years are good evidence that the speed of performance improvement cannot be so high as airlines are looking for.
Reality is different: due to the nature of the service provided, ANSP cannot adapt quickly to the changes of the traffic. And so costs.

SAFETY

GENERAL **Q04: Do you agree with the overall approach to target setting for safety in RP2?**	**Yes/No**
If not, please specify what in your opinion should be considered.	No

SAFETY is still the less ambitious KPA.
No quantitative approach but only qualitative.
Self-assessment methodology is not justified considering the importance of this KPA.
Validation of the self-assessment data performed by PRB, does not give enough guarantee, otherwise PRB were going to use the same methodology also for the other KPAs.
There are examples that proof that the self-assessment methodology in Just Culture leads to unrealistic figures that will not help the necessary safety improvements.

The strong trade off between safety-capacity, safety-cost, safety-flight efficiency are ignored: Introduction of safety KPA and its implementation will generate additional cost that has to be considered.

EU wide target for Just Culture is missing.

EFFECTIVENESS OF SAFETY MANAGEMENT **Q05: Do you agree that the EoSM targets are sufficiently ambitious?** If not, please specify what you consider being an adequate level.	**Yes/No** No

They are ambitious but not realistic nor achievable in a cost cutting environment as set up by the performance scheme.

EFFECTIVENESS OF SAFETY MANAGEMENT **Q06: Do you agree with the PRB proposal of having target for EoSM at ANSP level in 2019 only (and not intermediate targets)?** If not, please specify what you consider being an adequate intermediate target.	**Yes/No** No

Because other KPAs can have a negative effect on safety before the end of RP2. We must monitor it during RP2 with intermediate targets.

APPLICATION OF RAT METHODOLOGY **Q07: Do you agree that a high level of application of the RAT methodology must be achieved during RP2?** If not, please specify how it should be modified.	**Yes/No** No

It should be great to achieve 100% of RAT methodology, but it is neither realistic nor achievable in a cost cutting environment as set up by the performance scheme.

ENVIRONMENT

GENERAL **Q08: Do you agree with the approach for this KPA?** If not, please specify which additional evidence you would take into consideration.	**Yes/No** No

The environment KPA is limited to horizontal flight efficiency and does not include other indicator on: greenhouse gases, wildlife, noise pollution or the exhaust of micro particles. The latter would improve the working conditions and health situation of aviation workers.

Evaluate the ANSPs on the route filed by airline is not correct, as airlines may not always elect to file the most direct route (para 4.3.10). ANSPs should be evaluated on the route available.

Military areas, residual inefficiency (para 4.3.28) and environmental regulation (para 4.3.10) may dictate a longer route, so is not correct to consider as baseline the great circle; a correction index should be introduced.

Trade off between environment and capacity KPAs is completely ignored.

Improvements become more difficult as performance gets closer to residual inefficiency (para 4.3.28), so the flight efficiency in the years cannot be a straight line with a fixed angle, but it should be a curve with a decreasing inclination in the years.

Additional KPI for environment on flight efficiency can be:

KEP: AVERAGE HORIZONTAL EN ROUTE FLIGHT EFFICIENCY (LAST FILED FLIGHT PLAN)	**Yes/No**
Q09: Do you agree with the RP2 target range? If not, please specify how it should be modified.	No
In line with the realism key principle included in the report, setting the starting point PRB cannot ignore the reality of RP1: starting point IS (and must be) where we are or its tendency. We cannot use as starting point where we would like to be, otherwise all the calculation will be based on dreams and not on reality.	
KEA: AVERAGE HORIZONTAL EN ROUTE FLIGHT EFFICIENCY (ACTUAL TRAJECTORY)	**Yes/No**
Q10: Do you agree with the RP2 target range? If not, please specify how it should be modified.	No
As indicated in the report, ETF has big doubt on the data available for this target.	

CAPACITY	
GENERAL **Q11: Do you agree with the approach for this KPA?** If not, please specify how it should be modified.	**Yes/No** Yes
Clarification is needed on the para 4.4.25, about the wording "internal" industrial action.	
SPECIFIC QUESTIONS **Q12: Do you agree with the proposed approach for delays due to weather and network disruption?** If not, please specify how it should be modified.	**Yes/No** Yes

SPECIFIC QUESTIONS	Yes/No
Q13: Is it reasonable to expect that ANSPs should be able to resolve all structural and staffing issues to provide the required capacity in RP2? If not, please state why.	No
No, Due to the cost cutting framework set up by the performance scheme.	
COST EFFICIENCY	
GENERAL	**Yes/No**
Q14: Do you agree with the approach developed to support the "Minimum" scenario for this KPA? If not, which additional evidence would you take into consideration?	No
No, as all the key assumption for this scenario are un-correct. Call this scenario Minimum is misleading all the discussion, as it's already more ambitious than RP1	

GENERAL	**Yes/No**
Q15: Do you agree with the key assumptions (letters "A" to "D") for this KPA? If not, which ones would you propose?	No

A: it is not acceptable. PRB & EC cannot ignore the democratic process that leaded to the vote and compromise for RP1 targets.

B: we do not share the PRB view that the current level of ground capital expenditure will be sufficient to deploy best in class technology. Technology implementation coming from SESAR will boost the costs in the next year to further improve the safety and the capacity levels, and it cannot be ignored. Capacity has a cost, ignoring or under evaluate it is nonsense.

C: Statfor is very unreliable with a big magnitude of uncertainty. We cannot setup 5y mandatory targets on this basis. The risk sharing mechanism introduced with the new charging scheme does not solve the performance target problem.
A new system where targets are quickly corrects with the real traffic numbers must be put in place.

D: it does not reflect the reality. Starting point cannot be where EC wanted to be but where we are. The only starting point for good calculation is the reality. Reality is where we are. So actual en-route costs per SU in 2011.

SPECIFIC QUESTIONS	**Yes/No**
Q16: Have uncertainties about the trends in traffic (Service Units) being sufficiently reflected in the ranges? If not, what are your proposals?	No

Target should be updated as traffic changes.

SPECIFIC QUESTIONS	Yes/No
Q17: Do you agree that 'stretch' effects on top of the "Minimum" scenario for RP2 (including technology shift and/or structural changes) should be included in the en route EU-wide DUC target? If not, please state why	No

Stretch scenario is based on High Level Goals, that are unrealistic, unnecessary, political vision coming from EC.
These targets have never been validated; it is clearly stated in the ATM master plan that they are only a political vision.
HLG cannot be the base for mandatory targets for ANSPs, if we want to build a credible, reliable and realistic performance scheme.
The additional "stretching effect" is unreliable, based on assumption that are neither guaranteed nor decided. There is no proof that the changes identified will occur in the RP2. There is no proof or reliable estimation to quantify the contribute of this undefined changes to the performances.

SPECIFIC QUESTIONS	Yes/No
Q18: What would you need to implement (in terms of regulation, organization, airspace, procedures technology and human factors) to achieve the more ambitious "Accelerated Stretch – HLG 2025" scenario?	Yes

It is out of the scope of the RP2 target setting process to investigate additional changes to the current framework.
For all the other KPAs PRB always state that its playfield is the law and the performance scheme. Why on this KPA PRB is having a different approach?

High Level Goals were a set of political goals (Capacity, safety, environment, cost), when we were expecting traffic to double. At that time these goals have already been considered unrealistic. Nowadays, with the global crisis and its negative effect on traffic demand and forecast, keep considering this HLG is abstract and utopian.
Moreover extrapolate from this vision only the cost goal, forgetting the other goals and ignoring that the traffic is not going to be double is a very factious attitude.

INDICATIVE RANGES FOR CONSULTATION	
Q19: Do you agree with the indicative ranges for each KPI? If not, what suggestions do you have and evidence to support the changes?	**Yes/No** N/A