

Comment Response Document - Part 1

Consultation on new Taxi and ASMA methodology - 18 Nov. - 17 Dec. 2022

#	Document (ASMA, ATXIT, ATXOT)	Chapter, Section, Para, Bullet, etc. in the document	Comment type	Comment	Organization	Performance Review Unit Reply
1			Comment	The proposed changes to the methodology developed by PRU represent a significant improvement over the methodology previously used. Considering, that the methodology introduced in 2014 did not really provide the required results, PRU has now presented a revised and simplified methodology. Since the database itself is much better than 8-9 years ago, this methodology is in our view now suitable to work with and set up a new/updated monitoring.	DFS Deutsche Flugsicherung GmbH	Thank you for your comment.
2			Comment	From our point of view, however, a few basic requirements still have to be met, especially with regard to data transparency:		
3			Comment	<ul style="list-style-type: none"> Since the values consist of individual flight events, the "time stamps" used by PRU including the source per flight must be available to each stakeholder at all times. 	DFS Deutsche Flugsicherung GmbH	Thank you for your comment. The data sources for each time stamp are described in section 7.1. of each methodology document. The airport data is collected by PRU in accordance with the Eurocontrol APDF Data Specification (see section 8.1 of the methodologies documents) for the performance monitoring. The data at flight level is not publicly available but stakeholders at a given airport can contact PRU to request some ad hoc data extracts for validation purposes.
4			Comment	<ul style="list-style-type: none"> It must be possible to "clear data" in order to be able to exclude periods of exceptional operational conditions outside the responsibility of the ANSP from the time series (e.g., extreme weather, delays following safety-related incidents, accidents). This allows to focus on results under normal operation of the (K)PI. 	DFS Deutsche Flugsicherung GmbH	Thank you for your comment. In the different monitoring reports, the exceptional operating conditions (like strong winds, de-icing, etc) are normally contemplated in the explanation of abnormally high additional times (keeping in mind that these indicators are only used for monitoring and there is no target associated). At the moment no procedure is in place to exclude a particular period.
5			Comment	<ul style="list-style-type: none"> By switching to this revised methodology, necessary reference values are missing, which however would be needed for target setting. In this context, we at the same time do not consider the development of possible target values based on the "old" measurements to be appropriate. 	DFS Deutsche Flugsicherung GmbH	Thank you for your comment. These methodologies have been reviewed in the context of the EUROCONTROL Performance Review System and it is up to the PRB and the EC to decide on the adoption of these by the SES Performance Scheme. In any case, Additional Taxi Out Time and Additional ASMA Time are only PIs for monitoring and have no target associated. Additional Taxi In Time is not monitored in the SES performance scheme.
6			Comment	<ul style="list-style-type: none"> For the use of the indicators aTXOT and aTXIT it has to be considered that these can only be used for performance monitoring/- measurement of an ANSP if the ANSP exercises apron control at the respective airports. 	DFS Deutsche Flugsicherung GmbH	Thank you for your comment. The taxi-out and taxi-in transit times are measured to/from block times and runway take-off/landing times. The scope of the ATM performance monitoring is gate-to-gate. Delegation of apron control services to local service providers are subject to local service level agreements (with or without accountability distribution)
7			Comment	<ul style="list-style-type: none"> For the PI ASMA, a realistic default value must be determined for each STAR/SID over a period of time and reconciled with the ANSP. Assuming monitoring under the new methodology can begin in 2023, we believe it is possible that this process can be completed after, e.g. 4 years, so that it appears realistic that target values for the remaining 3 years of RP4 could then be prepared and established on this basis. 	DFS Deutsche Flugsicherung GmbH	Thank you for your comment. The data used for the ASMA transit time calculation does not include the particular STAR used but only the combination of the entry point in the ASMA cylinder and the landing runway. A separate reference value is calculated (based on a 1 year traffic data) for each combination of these two factors. The PRU welcomes the involvement of the ANSP for validation purposes. However, as mentioned above, these indicators do not have any target value associated in the current SES performance scheme, and it is up to the PRB and the EC to decide on the adoption of these new methodologies for RP4.
8	Add. ASMA Time	Section 3.5	Comment	By updating reference times on a rolling 12-month basis, there is a risk that continuous improvement is not captured by the metric? As the average delay time reduces alongside the reference times so you don't see the benefits Updating after major events (e.g. airspace change or controller tool deployment) seems sensible	NATS	Thank you for your comment. A change in performance, even if a continuous improvement, would be visible in the additional times, as the reference normally captures the transit times of those flights following optimal procedure (that is, with no inefficiency) and that does not change. An example is the time-based separations implementation at Heathrow in March 2018. The additional ASMA times shows a reduction of the inefficiency in the following months, as much as with the previous method. On the other hand, a major change in procedures would be indeed progressively captured. All possibilities were discussed by the Working Group (having a fixed reference updated in particular occasions or a rolling window). The advantage of having a rolling window that would automatically update the reference was deemed the most convenient approach to ensure reproducibility.
9	Add. ASMA Time	Section 3.2	Comment	Having an additional grouping of engine type as a factor to create a group and have separate landing times would be sensible. We have noticed that transit times vary markedly between jets and props - and therefore a material shift in a fleet mix can overly impact the metric	NATS	Thank you for your comment. The working group analysed this in depth. The FAQ document (third question) and the section 3.2 (par. 5 and 6) of the additional ASMA document explain the reason to not consider the aircraft class in the grouping of the flights.
10	Add. ASMA Time	Section 3.1	Comment	By considering a 40NM radius only, airports that place their point merge or hold stacks outside of that radius would not have that included in this metric. As these are part of the approach delay management, a more flexible radius may be preferable to capture all approach delay related technique	NATS	Thank you for your comment. The working group carefully considered the possibility to extend the radius of the ASMA cylinder to 50 NM. All approach tracks from 2019 for the To27 airports in Europe were analysed and revealed that only 6 of these airports had in fact any sort of vectoring or holding outside of the 40NM. When calculating the additional times considering either 40 or 50 NM, both options returned very similar results, with differences below 0,2 minutes. Only Madrid showed a higher difference (0.7 minutes of extra additional ASMA time captured when extending the radius to 50NM). Given the low impact, and the fact that the SES regulation (IR317 /2019) currently mentions 40 NM for the ASMA cylinder, the group decided to leave it at 40NM with the possibility to adapt it to 50NM in the future if the SES performance scheme also adapts.

