



Performance Review Body
designated by
the European Commission



RP2 Assessment - Comment Registry

Complete overview

Version 1.0

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Overview of 2015 Monitoring report VOL2 Fact validation responses

| Fabs/States | Response |
|-----------------------|--|
| BALTIC FAB | |
| Lithuania | Mon 12-09-2016 14:23 |
| Poland | Mon 12-09-2016 14:23 |
| BLUE MED FAB | |
| Cyprus | Tue 13-09-2016 16:36 |
| Greece | Tue 13-09-2016 16:36 |
| Italy | Tue 13-09-2016 16:36 |
| Malta | Tue 13-09-2016 16:36 |
| DANUBE FAB | |
| Bulgaria | |
| Romania | Tue 13-09-2016 16:32 |
| DK-SE FAB | |
| Denmark | Tue 13-09-2016 14:36 |
| Sweden | Tue 13-09-2016 14:36 |
| FAB CE | |
| Austria | Tue 13-09-2016 10:40 |
| Croatia | Tue 13-09-2016 10:51 (State&Fab) |
| Czech Republic | Tue 13-09-2016 14:45 (State&Fab) |
| Hungary | Tue 13-09-2016 12:51 (State&Fab) |
| Slovakia | |
| Slovenia | Tue 13-09-2016 14:45 (State&Fab) |
| FABEC | |
| Belgium | Tue 13-09-2016 15:34 Fri 16-09-2016 17:25 |
| France | Tue 13-09-2016 15:34 |
| Germany | Tue 13-09-2016 15:34 |
| Luxembourg | Tue 13-09-2016 15:34 |
| Netherlands | Tue 13-09-2016 15:34 |
| Switzerland | Tue 13-09-2016 15:34 |
| NE-FAB | |
| Estonia | Tue 13-09-2016 12:51 |
| Finland | Tue 13-09-2016 12:51 |
| Latvia | Tue 13-09-2016 12:51 |
| Norway | Tue 13-09-2016 12:51 |
| SW-FAB | |
| Portugal | Tue 13-09-2016 09:19 |
| Spain | Tue 13-09-2016 09:19 |
| UK-IRELAND FAB | |
| Ireland | Tue 13-09-2016 12:14 |
| United Kingdom | Thu 29-09-2016 16:54 |

1. RP2 Fact Validation - Comment Registry BALTIC FAB

Reception date: 12 Sep. 2016 14:23

Date of issue of the document commented

Details from sender:

Name of organisation/company – Urząd Lotnictwa Cywilnego/ Civil Aviation Authority

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Title of the Document commented:

| # Comment | Chapter / Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|---|--|---|
| 1 | Baltic FAB assessment of capacity performance (page 12) "BALTIC FAB did not apply a FAB-wide en route capacity incentive scheme". | Capacity | Factual mistake | This is not the case as it was provided in the CORRIGENDUM to the BALTIC FAB PP of 7 November 2014, on 14 November 2014, see page 57. ("Financial and applicable incentive considering the actual input per provider in order to achieve FAB level capacity targets"). | Thank you for your comment. However, the original statement is factual since FAB performance itself is not a criterion for either of your incentive schemes. |
| 2 | Baltic FAB Monitoring of CAPACITY for 2015 PRB Assessment of capacity performance (page 12) | Capacity | Factual | "PRB notes that no details were provided about [...] capacity improvements [...] for Poland...". It was understood that justification was needed if target had not met. We considered that justification of positive achievement was not rational at all as values clarified the situation. In fact the details concerning schedule of capacity improvements implementation in Poland have been contained in capacity plan (LSSIP 2016-2020 chapter 2 – in attachment). This document provides all assumptions concerned and planned capacity improvements. It is annually updated in bilateral meeting of PANSAs and Network Manager's representatives. | Thank you for your comment. The PRB expected to see information about capacity improvements coming from the NSA via the annual monitoring report. However, since you have now provided it will be updated in the document. |
| 3 | Baltic FAB Monitoring of airports contribution to CAPACITY for 2015 3. Arrival ATFM delay – national targets and incentive scheme (page 14) | Airports Contribution to CAPACITY | Factual | "Poland did not specify a national target nor established a related incentive scheme". National target and incentive scheme for arrival ATFM delay has been established for Poland in Corrigendum to Baltic FAB Performance Plan 2015-2019 which was delivered to European Commission in November 2015. Corrigendum to Baltic FAB Performance Plan 2015-2019. | Thank you for your comment. After reviewing the corrigendum, the targets will be updated. However, the incentive scheme is still not compliant for several reasons: - The target for the 2 nd basket (EPGD, EPKK, EPKT, EPPO, EPWR) can be understood as zero (as each of these airports have 0 min/arr as target). The incentive scheme for this basket presents bonus for 0 min/arr, which is the |

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| | | | | | <p>target and also the historical performance not necessarily incentivizing high performance but business as usual.</p> <ul style="list-style-type: none"> - The deadband for the second basket is not symmetrical with respect to the target - The deadband in the incentive scheme for EPWA is in fact 0-0.16 (and not 0-0.08 as stated in the Corrigendum) as no penalties are applied until >0.16 min/arr. To be clarified if it is a typo or if the penalties are in fact applied as from 0.08 arr/min. |
| 4 | <p>Monitoring of Airports Contribution to CAPACITY for 2015. Part 3. Arrival ATFM Delay – National Targets and Incentive Schemes (page 14). “...Lithuania did not establish a respective incentive scheme...”.</p> | Airports Contribution to CAPACITY | Factual mistake | <p>In opposite – Lithuania established, PRB/EC received it in the CORRIGENDUM to the BALTIC FAB PP of 7 November 2014, adopted on 14 November 2014, see page 57.</p> | <p>Thank you for your comment.</p> <p>After reviewing the corrigendum, the incentive scheme is considered to be non-compliant for several reasons:</p> <ul style="list-style-type: none"> - There are bonuses but penalties are not clearly defined. - The incentive scheme presents bonus for 0 min/arr, which is the target and also the historical performance: not necessarily incentivising high performance but rather business as usual. - The deadband is not symmetrical with respect to the target |

2. RP2 Fact Validation - Comment Registry Lithuania

| # Comment | Chapter/Section/Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|--|--|--|
| 1 | Monitoring of CAPACITY for 2015 LITHUANIA. Compliance issues relating to national capacity incentive scheme (page 19) | Capacity | Factual mistake | It was considered, see factual comment above, - incentive on the FAB level will be considered on the actual performance of separate provider and achievement on FAB level. Achieved actual value target on FAB level – 0.16 (while target – 0.21) – was better by 0.05 reference value. | Thank you for your comment. However, the original statement is factual since FAB performance itself is not a criterion for either of your incentive schemes. |
| 2 | Monitoring of CAPACITY for 2015 LITHUANIA. PRB observations regarding national capacity incentive scheme (page 19). “PRB suggests that stakeholders would appreciate greater justification of the en route incentive scheme” | Capacity | Factual | See Annex A of the Baltic FAB PP (Public consultation material, Minutes of consultation held in April 17, 2014), page 5. The issue of necessity on establishment of incentive scheme for ON which has been performing without delays in the past was considered with airspace users during national consultation in Vilnius, April 17, 2014. Lithuania was not in favor of establishing en route incentive scheme, therefore had requested EC for further clarification whether it could be considered as non-compliance with requirement of IR or not. As no response was received by the deadline of adopting PP, the scheme was adopted as presented at the consultation. PRB could discuss further such observation with the EC. Moreover, we should keep in mind theoretical probability on worsening operation due to unforeseen global situation. | Thank you for your comment, it has been noted by the PRB and will be forwarded to the incentive study of the European Commission. |

3. RP2 Fact Validation - Comment Registry Poland

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---|---|--|--|
| 1 | Baltic FAB POLAND Monitoring of SAFETY for 2015 Effectiveness of Safety Management | SAFETY | | In the pre-filled information contained in the Baltic FAB Monitoring Report 2015 there was value 59 score, while in the PRB Report there is 56. Please let us know what is the reason for the difference. | No change. The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores. |
| 2 | Baltic FAB POLAND Monitoring of CAPACITY for 2015 En route capacity incentive scheme | CAPACITY | factual | It seems that PRB in its report refers to Baltic FAB Performance Plan 2015-2019, before it has been revised by corrigendum in November 2015. In the corrigendum there is a target 0,26 min. ATFM delay per flight for 2015, but for consecutive years (from 2016 on) there is 0,23 min. ATFM delay per flight. The second question is the real (final) value of ATFM delay for 2015. In the Baltic FAB Monitoring Report 2015 there is value 0,16 (pre-filled information), while in the PRB report there is 0,18 min. Which value should be considered as correct one? | Thank you for your comment. After reviewing the corrigendum, volume 2 of the monitoring report will be updated with the new targets. In regards to your second question, the BALTIC FAB en route capacity performance was 0.16 for 2015 whereas the en route capacity performance for Warsaw FIR (Poland) was 0.18. |
| 3 | Baltic FAB POLAND Monitoring of CAPACITY for 2015 Compliance issues relating to national capacity incentive scheme | CAPACITY | factual | The Baltic FAB en-route ATFM capacity target depends on Polish and Lithuanian performance. In accordance with the Commission implementing decision (EU) 2015/348 of 2 March 2016 targets for en-route capacity of Baltic FAB has been recognized as consistent with the Union-wide performance targets. | Thank you for your comment. The Commission implementing decision refersonly to the FAB wide targets for en route capacity. The PRB has updated the monitoring report with the information provided in the corrigendum dated November 2014. |
| 4 | Baltic FAB POLAND Monitoring of airports contribution to CAPACITY for 2015 Arrival ATFM delay | Monitoring of airports contribution | factual | Poland has established national target on arrival ATFM delay of 0,04 min. delay/arrival for the whole reference period. It has been done in corrigendum to Baltic FAB Performance Plan 2015-2019. There has been established as well reference values for the individual airports where air traffic services are designated. | Thank you for your comment. The PRB has updated the monitoring report with the information regarding targets provided in the corrigendum dated November 2014. |
| 5 | Baltic FAB POLAND Monitoring of airports | Monitoring of airports contribution | factual | As mentioned above such target has been established and incentive scheme has been attached to it (see corrigendum to Baltic FAB Performance Plan 2015-2019). | The incentive scheme in the Corrigendum is not compliant for several reasons: - The target for the 2 nd basket (EPGD, EPKK, EPKT, EPPO, |

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| | contribution to CAPACITY for 2015 Arrival ATFM delay – national target and incentive scheme | | | | <p>EPWR) can be understood as zero (as each of these airports have 0 min/arr as target). The incentive scheme for this basket presents bonus for the 0 min/arr, which is the target and also the historical performance not necessarily incentivising high performance but business as usual.</p> <ul style="list-style-type: none">- The deadband for the second basket is not symmetrical with respect to the target- The deadband in the incentive scheme for EPWA is in fact 0-0.16 (and not 0-0.08 as stated in the Corrigendum) as no penalties are applied until >0.16 min/arr. To be clarified if it is a typo or if the penalties are in fact applied as from 0.08 arr/min. |
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4. RP2 Fact Validation - Comment Registry BLUE MED FAB

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------------------------------|--|--|--|
| 1 | BLUE MED FAB KEA (Pag 54) | ENVIRONM ENT | typo | Actual performance KEA (2.80%) shown in the document is different from that in the template that PRB proposed in spring 2016 (2.83%) and BLUE MED accepted as is and included in its Performance reporting 2015. | Thank you for your comment. The PRB is constantly reviewing the accuracy of the indicators and reacting to queries or anomalies highlighted by stakeholders. One such anomaly was due to switch over between SSR codes and resulted in double trajectories with variation in KEA. The data was recalculated, with the approval of the European Commission and the corrected figure was updated on the performance dashboard. |
| 2 | <p>BLUE MED FAB Monitoring of Airports Contribution to ENVIRONMENT for 2015 Table</p> <p>1. Overview (Pag 55) 1) Parag.: The Airport Operator Data Flow (APDF) is successfully established for 4 out of the 9 airports subject to RP2 in the Blue Med FAB. The FAB is monitored on the basis of the airports submitting data P</p> <p>1. Overview “... 4 out of the 9 airports...”</p> <p>2. Additional Taxi-Out Time #4 BUE MED FAB airports in picture</p> <p>3. Additional ASMA Time #5 BUE MED FAB airports in picture</p> | Airports Contribution to ENVIRONM ENT | Rewording | <p>With regards to Environment KPA, the Airports Contribution is at local level. Local, in these circumstances, according to Reg EC 390/2013, means at national level. Hence, such reporting should be seen only as paired convenience with the reporting for the KPI/PI established at FAB Level. The paragraph should be amended not making any reference the FAB.</p> <p>More over, there is inconsistency with the number of airports which submitted data and the number of airports shown within the two pictures.</p> <p>Propose wording: <i>The Airport Operator Data Flow (APDF) is NOT successfully established for ALL of the 9 airports subject to RP2. The monitoring of Additional Taxi-Out Time is based on 4 airports submitting data WHILE the additional ASMA time has been monitored for 5 airports.</i></p> | <p>Thank you for your comment. Indeed, the APDF is established for 5 airports. Nevertheless, the additional Taxi-Out time for Malta cannot be calculated due to missing data concerning the RWY designator.</p> <p>This information shall be included in the report</p> <p>The reference to FAB will be eliminated.</p> |
| 3 | BLUE MED FAB Monitoring of Airports Contribution to ENVIRONMENT | Airports Contribution to | Rewording | 1) Parag: It is well known the airports are purely local dimensions and Additional Taxi Out Time is a local indicator. A sole figure (i.e. “almost 4 min./dep”), which combines a | <p>Thank you for your comment.</p> <p>The rewording is accepted but the circumstances at Fiumicino will be included in the table for Italy.</p> |

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| | <p>for 2015 Table (Pag. 55) 2. Additional Taxi-Out Time 1) Parag: <i>“According to the available data, the additional TXOT in the Blue Med FAB is almost 4 min./dep..”</i> 2) Parag: <i>“The driver for this result is the additional times registered at Rome Fiumicino (7.06 min./dep.) , while other airports in the FAB contribute adequately to the European Performance”</i></p> | ENVIRONM ENT | | <p>number of airports, cannot give useful insights and, although the need to provide summary information is understandable, such a figure does not seem either to be of some valuable interest or can steer improvements at local level. Moreover, only four airports out of nine have been monitored. 2) Parag: it is not known whether and when a value (or range of values), which identifies an adequate contribution, has been fixed.</p> <p>It is proposed to reword as follows: <i>According to the available data, the additional taxi out times of three airports within Blue Med FAB area –Bergamo, Venice and Athens, with less than 100000 departures in 2015 - are well below 2 min./dep..</i> <i>At Rome Fiumicino, with more than 140000 departures, the additional TXOT is around 7.06 min./dep. This happened despite the planning and coordination activities carried out by the major players operating. During 2015 some critical or unexpected events occurred (maintenance on RUNWAY 16L/34R, disruptive fire at the Terminal 3 (May, 2015), fire at the Pine Forest close to the airport, fugitives on the maneuvering area). Because of the prolonged unavailability of Terminal 3 fewer parking bays and gates were available in comparison to 2014. Also not-optimal procedures had to be adopted to load/unload passengers and goods (fewer loading-bridge-equipped parking bays). Extended turn-around times and non-respect of imposed cuts on airport capacity by the airliners were likely to be the major contributors to such effects.</i> <i>More details are available within corresponding tables for States.</i></p> | |
| 4 | <p>3. Additional ASMA Time The observed additional ASMA times at available airports within the Blue Med FAB range below the European average, resulting in an average of 1.17 min./arr.. (Pag. 55)</p> | Airports Contributio n to ENVIRONM ENT | GENERAL | <p>Similar rationale as per par. 1. and 2.: Additional ASMA Time is a local indicator. Proposed alternative text: <i>The observed additional ASMA times at airports within the Blue Med FAB area range below the European average. Details are available within corresponding tables for States.</i></p> | Thank you for your comment. The document shall be updated. |

5. RP2 Fact Validation - Comment Registry Cyprus

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|---|---|--|
| 1 | CYPRUS Pg. 56, "Monitoring process for capacity performance" | CAPACITY | GENERAL | CYPRUS would like to amend the BM FAB PP Report with the addition of the following text: The monitoring process on en-route ATFM delay per flight is implemented by DCAC on a monthly basis to ensure the timely identification of poor performance requiring the adoption of counterbalancing measures. | Thank you for your comment. The document shall be updated. |
| 2 | CYPRUS Pg. 59, PRB Observations of the Application of FUA | CAPACITY | | CYPRUS would like to amend the BM FAB PP Report with the addition of the following text: In accordance with the national plan for the implementation of FUA, the Ministerial Committee and the High Level Committee review the effective implementation of (EC) 2150/2005 so as to ensure the conformance with the applicable regulatory requirements and to ensure that both civil and military airspace users are receiving the optimum benefit from airspace management. | Thank you for your comment. The document shall be updated. |
| 3 | CYPRUS Pg. 64 - Monitoring of Airports Contribution to ENVIRONMENT for 2015 - additional taxi-out time indicator | Airports Contribution to ENVIRONMENT | GENERAL | CYPRUS would like to amend the BM FAB PP Report with the addition of the following text: The additional taxi-out time indicator is not monitored at LCLK and LCPH at the time being. | Thank you for your comment. The additional TXOT is not available due to the lack of data, the document shall be updated. |
| 4 | CYPRUS Pg. 64 - Monitoring of Airports Contribution to ENVIRONMENT for 2015 | Airports Contribution to ENVIRONMENT | GENERAL | CY would like the PRB to take into account the comment made by CY in the Report i.e. "Paphos should be excluded from the PP monitoring process as it has less than 70000 movements and IS NOT the airport with the highest number of IFR air transport movements (ref. (EU) 390/2013 Art. 1 pt. 4)" | Thank you for your comment. Member States can include airports with less than 70000 IFR movements in their Performance Plan. Paphos was included in the list of airports identified as subject to RP2 in the Blue Med Performance Plan Therefore it is included in the operational monitoring. |
| 5 | CYPRUS Pg. 65 En route Capacity incentive scheme | CAPACITY | FACTUAL | CY requests the PRB to rephrase the comment " <i>Penalties associated with the Cyprus incentive scheme are not published but "are in accordance with national law"</i> ". National law IS published for all to read (ref. ΚΔΠ 72/2011). We recommend the comment to be " <i>Penalties associated with the Cyprus incentive scheme are in accordance with</i> | Thank you for your comment. The PRB will update the text to read "The Cypriot authorities report that the penalties associated with the Cyprus incentive scheme are in accordance with national law." |

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| | | | | <i>national law".</i> | |
| 6 | CYPRUS Pg. 65 Compliance issues relating to national capacity incentive scheme | CAPACITY | GENERAL | CY requests the PRB to reconsider the comment <i>"In the assessment report of the BLUEMED FAB RP2 performance plan, the PRB noted that the incentive scheme for Cyprus is non-transparent; it is not proportional or effective, and it does not foster a high-level of capacity performance at either FAB or national level. None of this issue were addressed in the FAB monitoring report."</i> The CY incentive scheme is described in the PP and as such it is transparent . The 2016 capacity performance is significantly improved, because of, inter alia, the promised incentive scheme. Hence it is effective . | Thank you for your comment. The PRB stands by its earlier analysis and notes that the Cypriot national target of 1.5 minutes was missed by a considerable margin. |
| 7 | CYPRUS Pg. 66 PRB Observations on Effective booking procedures | CAPACITY | GENERAL | CY requests the PRB to remove the comment <i>"Historically, Cyprus has stated to the PRB that military operations and training does not impact either ATC capacity or available route options for GAT traffic."</i> It is rather misleading since the extensive military operations in Nicosia FIR DO impact the ATC capacity. Pls clarify how the PRB has reached such a conclusion. | Thank you for your comment. During RP1, when requesting data on the effective use of civil military airspace structures, the response provided by the Cyprus AMC was that military operations and training do not impact ATC capacity or flight efficiency. Since we received no information in the annual monitoring report about effective booking procedures, it would appear that this is still the case. |
| 8 | CYPRUS Page 68, "en route service units" | COST-EFFICIENCY | GENERAL | CYPRUS requests that the PRB Report is amended with the addition of the following text at the end of paragraph 2: Cyprus had explained in its report that it had decided to be prudent regarding the traffic forecast because Cyprus is situated in a highly unstable region where traffic is highly sensitive to the political changes of the neighbouring countries. Due to this fact the traffic forecast for Cyprus is characterised by a high level of uncertainty. | Thank you for your comment which is noted. The Report is updated accordingly |
| 9 | CYPRUS Page 74 "3. Technical notes on en-route and terminal information reported by Cyprus" | COST-EFFICIENCY | GENERAL | CYPRUS acknowledges that the statement is factually correct. Nevertheless, CY considers that the analysis is still useful for the user of the Tables. We therefore request that the PRB Report is amended with the removal of the following text : <i>As the TANS activities are fully financed through "income from other sources", the analysis of the terminal economic surplus is not meaningful.</i> | Thank you for your comment which is noted. The Report is updated accordingly. |

6. RP2 Fact Validation - Comment Registry Greece

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|--|--|--|
| 1 | <p><u>GREECE.</u> <u>Monitoring of SAFETY for 2015.</u></p> <p>1. Effectiveness of S.M.S.</p> | | Typo | The score at State level depicted in the table of report, is 66 whilst it was declared 71. Is it a type mistake? | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> |

7. RP2 Fact Validation - Comment Registry Italy

| # Comment | Chapter/Section/Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---|--|---|--|
| 1 | <p>ITALY Monitoring of Airports Contribution to ENVIRONMENT for 2015 (Pag. 96)</p> <p>Table</p> <p>1. Overview</p> <p>2) Parag: <i>In general Italian airports contribute to the European performance. However the additional taxi-out times at Rome Fiumicino range at more than 7 minutes, impacting the national and the FAB averages.</i></p> <p>Al in comparison to 2. Additional Taxi-Out Time item</p> | Airports Contribution to ENVIRONMENT | Rewording | <p>As discussed above. Reference to averages calculated over airports with different characteristics should be avoided.</p> <p>More:</p> <ul style="list-style-type: none"> - only additional TXOT mentioned here, additional ASMA not mentioned here <p>it is the same information reported in below in 2.. It is suggest to delete parag. 2)</p> | <p>Thank you for your comment.</p> <p>The text will be updated removing the national and FAB reference.</p> <p>The additional TXOT is the only one mentioned because is the only indicator above European average values. The text will be reworded for clarification.</p> |
| 2 | <p>ITALY Monitoring of Airports Contribution to ENVIRONMENT for 2015</p> <p>Table</p> <p>2. Additional Taxi-Out Time item</p> <p>1) Parag: <i>The average additional TXOT for the observed airports in Italy is 5.03 min./dep., well above both the FAB level and the European level. This is caused by the performance at Rome Fiumicino (LIRF), with an additional TXOT of 7.06 min./dep., that raises the national average which otherwise would be well below the European levels.</i></p> <p>2) Parag: <i>The additional TXOT at</i></p> | Airports Contribution to ENVIRONMENT for 2015 | Rewording | <p>No reference is made to exceptional circumstances in Fiumicino airport such as maintenance on RUNWAY 16L/34R, disruptive fire at the Terminal 3 (May, 2015), fire at the Pine Forest close to the airport, fugitives on the manoeuvring area.</p> <p>It is therefore proposed to amend and add at parag 2 the following: <i>In particular, Bergamo, Venice, with less than 100000 departures in 2015 are well below 2 min./dep.. At Rome Fiumicino, with more than 140000 departures, the additional TXOT is around 7.06 min./dep. This happened despite the planning and coordination activities carried out by the major players operating. During 2015 some critical or unexpected events occurred (maintenance on RUNWAY 16L/34R, disruptive fire at the Terminal 3 (May, 2015), fire at the Pine Forest close to the airport, fugitives on the maneuvering area). Because of the prolonged unavailability of Terminal 3 fewer parking bays and gates were available in comparison to 2014. Also not-optimal procedures had to be adopted to load/unload passengers and goods (fewer</i></p> | <p>Thank you for your comment.</p> <p>A summary of this information shall be included in the document.</p> |

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| | <i>LIRF is the second highest in Europe. The performance for the other Italian airports is commensurate with their traffic levels.</i> | | | <i>loading-bridge-equipped parking bays). Extended turn-around times and non-respect of imposed cuts on airport capacity by the airliners were likely to be the major contributors to such effects.</i> | |
| 3 | 3. Additional ASMA Time <i>Performance concerning ASMA times at studied Italian airports is better than the European average both at national and local level. Rome Fiumicino shows a very good performance (1.66 min./arr.) given its traffic levels. (Pag 97)</i> | Airports Contribution to ENVIRONMENT for 2015 | Rewording | Propose amendment: <i>Performance concerning ASMA times at studied Italian airports is better than the European average. Rome Fiumicino shows a very good performance (1.66 min./arr.) given its traffic levels.</i> | Thank you for your comment. Proposed rewording is accepted. |
| 4 | 3. Arrival ATFM Delay – National Targets and Incentive Schemes (Pag. 60) | Airports Contribution to ENVIRONMENT for 2015 | Clarification | Very similar comment was made after presenting the PRB with the first BM PP iteration in 2014. Then targets have been revised and significantly reduced with the second iteration in 2015. No reference values have been provided by PRU/PRB to support further target elaboration. | Thank you for bringing this to our attention. Indeed targets have been revised and the report will be updated accordingly. |
| 5 | 4 ATFM Slot Adherence (Pag. 60) | Airports Contribution to ENVIRONMENT for 2015 | Clarification | About the Italian airports the computation of ATFM slot violation is made upon data from the Network Manager. No details were available on flights that were granted the derogation from the standard slot tolerance window (-5/+10 min). The big amount of flights together with the partly erroneous computation might be the cause for such a result. | Thank you for your comment. The clarification is noted. |
| 6 | 5. Pre-departure Delay (Pag. 60) | Airports Contribution to ENVIRONMENT for 2015 | Clarification | If the airport operator flow data consist of A-CDM data, this should be mentioned | Thank you for your comment. At this point, PRB has no visibility on how the submitted data is produced. |
| 7 | PRB observations regarding national capacity incentive scheme (Pag. 98) | CAPACITY | Clarification | Targets adopted by Italy in the performance plan were chosen based on the reference values provided by EC and based on NOP values (same as for all other States/FABs), applying penalties for under-performance and bonuses for over-performance according to a symmetric and incremental system. | Thank you for your comment which has been noted. |
| 8 | 3. Additional ASMA Time PRB Observations on Effective booking procedures (Pag. 99) | CAPACITY | Clarification | With reference to PRB's observation, Italy is compliant to Regulation 2150/2005 Article 4 (n) with reference to "establish mechanisms to archive data on the requests, allocation and actual use of airspace structures for further analysis and planning activities" | Thank you for your comment. The PRB notes that no information has been provided to the PRB despite such provision being mandatory according to Regulation 390/2013. |
| 9 | 2. Arrival ATFM Delay (Pag 100) | Airports Contribution | Clarification | This section is based upon erroneous data coming from first iteration of BM PP. | Thank you for bringing this to our attention. Indeed targets have been revised and the report will be |

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| | | n to CAPACITY | | The second one proposed a national target of 0.41 min/flight. The achieved one of 0.57 min/flight. To be noted that also in May 2016 this comment has been put forward to PRB by the Italian NSA showing the correct data | updated accordingly. |
| 10 | 3. Arrival ATFM Delay – National Target and Incentive Scheme (Pag. 100) | Airports Contribution to CAPACITY | Clarification | Information contained herein is erroneous since is based on the first iteration of BM PP. All this section shall be reworded. | Thank you for bringing this to our attention. Indeed targets have been revised and the report will be updated accordingly. |
| 11 | 4. ATFM Slot Adherence (Pag. 100) | | Clarification /Rewording | <p>About the Italian airports, computation of ATFM slot violation is made upon data from the Network Manager. No details were available on flights that had the derogation granted from the standard slot tolerance window (-5/+10 min).</p> <p>The big amount of flights together with the partly erroneous computation might be the cause for such a result at Fiumicino Airport.</p> <p>A potential rewording would be: "In no cases the derogation from the Standard AFTM Slot Tolerance Window (-5/+10 min.) has been taken into account. With the exception on Rome Fiumicino (LIRF, 88%) the adherence to AFTM STANDARD Slot Tolerance Window ranges well above the 90% threshold, i.e. 92-98%, for the Italian airports".</p> | Thank you for your comment. The clarification is noted and the rewording is accepted. |
| 12 | Italy - Page 95, first table Eo SM State Level score | SAFETY | General | <p>PRB lowered to a great extent the Eo SM State level as estimated by the competent authority.</p> <p>The new data has been published without previous consultation with ENAC.</p> <p>Eo SM is not a physical measurement, but a score which is a consequence of a judgment.</p> <p>ENAC, the Italian Competent authority was not given the possibility to preview the score validation from EASA and eventually to replicate, as it is usually done when the ANSP answers are verified.</p> | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> |
| 13 | Application of the severity classification of the Risk Analysis Tool (RAT) (Pag.117) | SAFETY | Factual mistake (reversed Numbers) | <p>The correct:</p> <ul style="list-style-type: none"> • RIs ATM Ground value is 100% • ATM-S value is 93% | <p>Accepted.</p> <p>Indeed ATM Ground should be 100% for RIs and for ATM-S ATM Overall should 93%. Figures have been updated accordingly.</p> |
| 14 | ITALY: En-route charging zone | COST- | mistake | ITAF costs are -1,4% in real terms and not + 1.4% as reported | Thank you for your comment. The Report will be updated |

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|----|---|-----------------|------------------------|--|--|
| | Monitoring of en-route COST-EFFICIENCY for 2015 Box 3. Focus on en-route at State/Charging Zone level page 102 | EFFICIENCY | | in the text | accordingly. |
| 15 | ITALY: En-route charging zone Monitoring of en-route COST-EFFICIENCY for 2015 Box 8. En-route DUC 2015 vs. 2015 Actual Unit Cost for users Page 103 | COST-EFFICIENCY | Clarification required | It is not clear how the traffic adjustment is calculated | Thank you for your comment. The Readers Guide at beginning of the Volume 2 Monitoring report (para. 2.2) refers to the fact that the traffic adjustment differs from the traffic adjustment due to traffic risk sharing; shown in the Box 8 is calculated to reflect the fact that, <u>for the costs not subject to traffic risk sharing</u> , over/under recoveries due to higher/lower traffic than planned in year “N” will be fully charged/reimbursed to airspace users in year “N+2”. Although the cash flow does not take place in year “N”, it is considered as part of the 2015 AUC-U. |
| 16 | ITALY: En-route ATSP (ENAV) Monitoring of en-route COST-EFFICIENCY for 2015 Box 9. Focus on ATSP: Net ATSP gain/loss on en-route activity Page 104 | COST-EFFICIENCY | Clarification required | For what concerns the Determined costs for the ATSP (PP) - based on actual inflation, in our opinion the reported value of 500.771 ('000 €2009) is not correct. It should be 487.764 ('000 €2009). In any case, further clarification on the calculation is required. | Thank you for your comment. We note, that the value 487.764 ('000 €2009 refers to the actual ATSP costs in real terms based on actual inflation. The Readers Guide at beginning of the Volume 2 Monitoring report refers (para. 2.2), <i>calculation of the gain/loss to be retained in respect of traffic risk sharing considers the <u>determined costs</u> of the main ATSP in 2015 after deduction of costs for exempted VFR flights, as these are the basis for the calculation of the traffic risk sharing. These are expressed in €2009, using the 2015 actual inflation index (as shown in box 2) due to the fact that the gain/loss retained by the ATSP for the current year is an actual gain/loss, so converting this value into €2009 has to be done using the actual inflation rate.</i> |
| 17 | ITALY: En-route ATSP (ENAV) Monitoring of en-route COST-EFFICIENCY for 2015 12. Focus on en-route ATSP: General conclusions ENAV net gain/loss on en-route activity in 2015 Page 105 | COST-EFFICIENCY | Clarification required | PRB states : “a gain of +5.3 M€2009 (or 5.8 M€ in nominal terms), corresponding to a bonus eligible for payment to ENAV as part of the en-route capacity target incentive mechanism. The inclusion of this bonus in the chargeable costs will be examined by the European Commission as part of the compliance review of the 2017 unit rates. This amount corresponds to 1.03% of ENAV en-route revenues (based on the ATSP chargeable unit rate in 2015 times the actual TSUs). ” In our opinion the value of 1.03% is not correct. Further clarification on the calculation is required. | Thank you for your comment. We note that the value if this incentive in terms of ENAV en-route revenues for 2015 should be 1.06% instead of 1.03%. The Report will be updated accordingly. The Readers Guide at beginning of the Volume 2 Monitoring report refers (para. 2.2), <i>the ATSP en-route revenues in the year are estimated by multiplying the ATSP component of the en-route unit rate (item 5.9 in the Reporting Tables) with the actual number of TSUs in 2015, in line with the European Commission instructions.</i> In the case of ENAV the calculation of ATSP en-route |

| | | | | | |
|----|--|-----------------|------------------------|---|---|
| | | | | | revenues yields 545.3 M€ (i.e. $66.74 \text{ €} * 8\,171\,509 \text{ TSUs}$). And $5\,773\,998\text{€}/545.3\text{M€}=1.06\%$ |
| 18 | ITALY: Terminal ATSP (ENAV) Italy - Zone 1 Monitoring of terminal COST-EFFICIENCY for 2015 Box 9. Focus on ATSP: Net ATSP gain/loss on terminal ANS activity Page 108 | COST-EFFICIENCY | Clarification required | For what concerns the Determined costs for the ATSP (PP) - based on actual inflation, in our opinion the reported value is not correct. Further clarification on the calculation is required. | <p>Thank you for your comment.</p> <p>The Readers Guide at beginning of the Volume 2 Monitoring report refers, <i>calculation of the gain/loss to be retained in respect of traffic risk sharing considers the <u>determined costs</u> of the main ATSP in 2015 after deduction of costs for exempted VFR flights, as these are the basis for the calculation of the traffic risk sharing. These are expressed in €2009, using the 2015 actual inflation index (as shown in box 2) due to the fact that the gain/loss retained by the ATSP for the current year is an actual gain/loss, so converting this value into €2009 has to be done using the actual inflation rate.</i></p> |
| 19 | ITALY: Terminal ATSP (ENAV) Italy - Zone 1 Monitoring of terminal COST-EFFICIENCY for 2015 Box 12. Focus on terminal ATSP: General conclusions | | Clarification required | PRB states : “This amount corresponds to 0.3% of ENAV TCZ 1 revenues (based on the computation of the ATSP chargeable unit rate in 2015 (194.32 €) times the actual TNSUs in TCZ 1 in 2015 (€ 221 862).” Further clarification on the 0.3% calculation is required. | <p>Thank you for your comment.</p> <p>The Readers Guide at beginning of the Volume 2 Monitoring report refers:,” <i>the ATSP [terminal] revenues in the year are estimated by multiplying the ATSP component of the terminal unit rate in [TCZ 1] (item 5.9 in the Reporting Tables) with the actual number of TNSUs in 2015 recorded for [TCZ 1], in line with the European Commission instructions.</i></p> <p>In the case of ENAV the calculation of ATSP revenues in [TCZ 1] yields 43.1 M€ (i.e. $194.32 \text{ €} * 221\,862 \text{ TNSUs}$). And $137\,959\text{€}/43\,111\,549\text{€}=0.3\%$</p> |

8. RP2 Fact Validation - Comment Registry DANUBE FAB

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------|--|--|--|
| 1 | Monitoring of ENVIRONMENT – KEA | | factual | In the June Monitoring Report the pre-filled data implied a 1.29% actual performance while in the PRB Annual Monitoring Report we can see a 1.23% actual performance value. We would like to point out that different figures on actual performance were identified through different documents (PRB dashboard, www.ansperformance.eu , etc.) | Thank you for your comment. The PRB is constantly reviewing the accuracy of the indicators and reacting to queries or anomalies highlighted by stakeholders. One such anomaly was due to switch over between SSR codes and resulted in double trajectories with variation in KEA. The data was recalculated, with the approval of the European Commission and the corrected figure was updated on the performance dashboard. |

9. RP2 Fact Validation - Comment Registry Romania

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---|--|---|---|
| 1 | PRB Observations of the application of FUA | CAPACITY | general | In accordance with the provisions of national regulation RACMR MSA-UFGA, annual civil-military analyses are conducted. From 2015 continuous oversight for FUA is conducted by inspections with experts from both the civil and military aviation authorities. | Thank you for your comment. The PRB looks forward to receiving data regarding the annual reviews in the future. |
| 2 | Effective booking procedures | | general | Taking into consideration the civil - military coordination, a decision was taken to factor in only the reserved/ restricted areas that have an impact on GAT flights. | Thank you for your comment, the document has been updated accordingly. |
| 3 | Planning and Effective Use of CDRs p 163 | CAPACITY | general | There is no monitoring process for CDRs. The CDRs are published in AUP/ UUP with associated TRAs | Thank you for your comment which has been noted. |
| 4 | Monitoring of Airports Contribution to CAPACITY – 1.Overview | Airports Contribution to CAPACITY | typo | <u>Original text:</u> The Bulgarian performance is commensurate with the traffic and shows... <u>Proposed change:</u> The Romanian performance is commensurate with the traffic and shows... | Thank you for your comment, the document has been updated accordingly |
| 5 | Monitoring of Airports Contribution to CAPACITY – 2.Arrival ATFM Delay | Monitoring of Airports Contribution to CAPACITY | typo | <u>Original text:</u> Bulgaria has established a constant... <u>Proposed change:</u> Romania has established a constant... | Thank you for your comment, the document has been updated accordingly |

10.RP2 Fact Validation - Comment Registry DK - SE FAB

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|--|---|---|
| 1 | 1. Overview, at p. 179 | Airports Contribution to ENVIRONMENT | General note | We note the acknowledgement by the PRU that DK-SE FAB contributes remarkably to the airport related ANS Capacity performance in Europe | Thank you for your note. |
| 2 | Result of FAB capacity Incentive Scheme, at p. 182 Text: "Only Naviair and LFV are mentioned in 4.1 of the performance plan" | CAPACITY | Explanation | A further analysis has shown that also the other ANSPs in Sweden have a small part of their operations in the en route area. Hence we believe that ACR and Arvidsjaur should benefit from the bonus from the capacity incentives as well. Also note that it is only a small amount of the total bonus which is referable to ACR and Arvidsjaur. | Thank you for your comment. Discussion are ongoing between the PRB and Sweden. |
| 3 | Application of FUA, at p. 182 Text: "No information was provided about Denmark" | CAPACITY | Explanation | The Flexible Use of Airspace concept was established many years ago in Denmark and is fully compliant with "Regulation 2150/2005 - Common Rules for the Flexible Use of Airspace". The NSA has established oversight procedures in order to ensure continuous compliance with the regulation and ENV KPI reports have been provided as requested by PRC/PRU. Only very little further capacity improvements are possible by Flexible Use of Airspace, as the concept is very effective and established within a free route airspace environment. | Thank you for your comment which has been noted. The document will be updated. |

11.RP2 Fact Validation - Comment Registry Denmark

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response | | | | | | | | | | | | | | | | | | | | | |
|----------------------------------|--|-----------------------------------|--|---|---|--------------------|----------------------|--------------------------------|---------|---------|------------------------------|-----|-----|------------------------|---------|---------|----------------------|-----------|-----------|--------------------------|--|--|----------------------------------|------|------|--|
| 1 | Denmark, 1. Overview, first paragraph, at p. 191. Text: "The national target on arrival ATFM delay of 0 min./arr. is fully met." | Airports Contribution to CAPACITY | Typo | Should be: "The national target on arrival ATFM delay of 0.11 min./arr. is fully met." | Thank you for your comment. The value shall be corrected | | | | | | | | | | | | | | | | | | | | | |
| 2 | Denmark, 12. Focus on en-route ATSP: General conclusions, last paragraph. Text: "It is noteworthy, that Naviair will receive a compensation to cover a part of the 2015 inflation adjustment through the 2017 unit rate." | | Explanation | It should be noted that the specific amounts appear under "5.6 Other other revenues" in the reporting tables for en-route. | Thank you for your explanation. It will be reflected in the report. | | | | | | | | | | | | | | | | | | | | | |
| 3 | Denmark, Gate-to-gate, 3. Technical notes on en-route and terminal information reported by Denmark. Text: "In the en-route and terminal Reporting Tables, the assumptions provided for the calculation of Naviair cost of capital over RP2 (i.e. capital structure and interest on debts) are not fully transparent and consistent."- | COST-EFFICIENCY | Explanation | <p>During Naviairs submission of data to ACE2015 benchmarking an error was discovered in the allocation of the asset base to en route and TNC CPH. This affected the data submitted in the route charges scheme and TNC CPH – both tables will be updated and resubmitted. To ensure consistency in the reporting of the asset bases we would like to have amended the report to the following:</p> <p>En route</p> <p>3. Complementary information (in nominal terms)</p> <table border="1"> <thead> <tr> <th>Average asset base</th> <th>Submission on June</th> <th>Corrected submission</th> </tr> </thead> <tbody> <tr> <td>3.1 Net book val. fixed assets</td> <td>920.662</td> <td>909.811</td> </tr> <tr> <td>3.2 Adjustments total assets</td> <td>0,0</td> <td>0,0</td> </tr> <tr> <td>3.3 Net current assets</td> <td>305.387</td> <td>307.555</td> </tr> <tr> <td>3.4 Total asset base</td> <td>1.226.049</td> <td>1.217.366</td> </tr> <tr> <td colspan="3">Cost of capital %</td> </tr> <tr> <td>3.5 Cost of capital pre tax rate</td> <td>4,7%</td> <td>4,7%</td> </tr> </tbody> </table> | Average asset base | Submission on June | Corrected submission | 3.1 Net book val. fixed assets | 920.662 | 909.811 | 3.2 Adjustments total assets | 0,0 | 0,0 | 3.3 Net current assets | 305.387 | 307.555 | 3.4 Total asset base | 1.226.049 | 1.217.366 | Cost of capital % | | | 3.5 Cost of capital pre tax rate | 4,7% | 4,7% | <p>Thank you for providing the corrected en-route and terminal asset base data. The report will be amended to reflect the new submission.</p> <p>Furthermore, the technical note on en-route and terminal information reported by Denmark (p.200) will be complemented to reflect the explanations provided in the additional information.</p> |
| Average asset base | Submission on June | Corrected submission | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.1 Net book val. fixed assets | 920.662 | 909.811 | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.2 Adjustments total assets | 0,0 | 0,0 | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.3 Net current assets | 305.387 | 307.555 | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.4 Total asset base | 1.226.049 | 1.217.366 | | | | | | | | | | | | | | | | | | | | | | | | |
| Cost of capital % | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.5 Cost of capital pre tax rate | 4,7% | 4,7% | | | | | | | | | | | | | | | | | | | | | | | | |

| | | | | <table border="1"> <tr> <td>3.6 Return on equity</td> <td>5,0%</td> <td>5,0%</td> </tr> <tr> <td>3.7 Average interest on debts</td> <td>4,4%</td> <td>4,5%</td> </tr> </table> <p>TNC CPH 3. Complementary information (in nominal terms)</p> <table border="1"> <thead> <tr> <th>Average asset base</th> <th>Submissi on June</th> <th>Corrected submissio n</th> </tr> </thead> <tbody> <tr> <td>3.1 Net book val. fixed assets</td> <td>159.385</td> <td>157.506</td> </tr> <tr> <td>3.2 Adjustments total assets</td> <td></td> <td></td> </tr> <tr> <td>3.3 Net current assets</td> <td>52.868</td> <td>53.244</td> </tr> <tr> <td>3.4 Total asset base</td> <td>212.253</td> <td>210.750</td> </tr> </tbody> </table> <p>Cost of capital %</p> <table border="1"> <tr> <td>3.5 Cost of capital pre tax rate</td> <td>10,4%</td> <td>10,5%</td> </tr> <tr> <td>3.6 Return on equity</td> <td>12,6%</td> <td>12,6%</td> </tr> <tr> <td>3.7 Average interest on debts</td> <td>7,0%</td> <td>7,1%</td> </tr> </table> <p>This will affect the calculation presented in Box 10 and hence forth the conclusions in Box 11. As explained in the additional information Naviair does not have dedicated balance-sheet for the different business units, i.e. en route etc. The basis/principle for the split between En route and TNC is however the same to ensure consistency between reports for AMR, Charges scheme, and ACE. Furthermore as is explained in the additional information our cost of capital is the combined amount of return on equity, interest payment on debt, and the deduction of capitalisation of interim interest. The combination of the three and the allocation of the entire asset base skews the calculation performed in the Annual Monitoring Report.</p> | 3.6 Return on equity | 5,0% | 5,0% | 3.7 Average interest on debts | 4,4% | 4,5% | Average asset base | Submissi on June | Corrected submissio n | 3.1 Net book val. fixed assets | 159.385 | 157.506 | 3.2 Adjustments total assets | | | 3.3 Net current assets | 52.868 | 53.244 | 3.4 Total asset base | 212.253 | 210.750 | 3.5 Cost of capital pre tax rate | 10,4% | 10,5% | 3.6 Return on equity | 12,6% | 12,6% | 3.7 Average interest on debts | 7,0% | 7,1% | |
|----------------------------------|--|-----------------------------|-----------------|---|---|------|------|-------------------------------|------|------|--------------------|---------------------|-----------------------------|--------------------------------|---------|---------|------------------------------|--|--|------------------------|--------|--------|----------------------|---------|---------|----------------------------------|-------|-------|----------------------|-------|-------|-------------------------------|------|------|--|
| 3.6 Return on equity | 5,0% | 5,0% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.7 Average interest on debts | 4,4% | 4,5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Average asset base | Submissi on June | Corrected submissio n | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.1 Net book val. fixed assets | 159.385 | 157.506 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.2 Adjustments total assets | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.3 Net current assets | 52.868 | 53.244 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.4 Total asset base | 212.253 | 210.750 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.5 Cost of capital pre tax rate | 10,4% | 10,5% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.6 Return on equity | 12,6% | 12,6% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3.7 Average interest on debts | 7,0% | 7,1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 4 | Denmark, Safety, Effectiveness of Safety Management. | Safety | Factual mistake | <p>At State level the score for Safety Promotion is indicated as "A". However no "A" has been reported by Denmark to EASA through the self-assessment process.</p> | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> <p>Denmark has reported Level A for the following question: Q4.2 The competent authority has an established system that</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|--|--------|-------------|---|--|
| | | | | | gathers information on best (good) practices, safety-relevant information and safety lessons learnt from the industry (such as regional/local operational safety improvement action plans, toolkits). |
| 5 | Denmark, Safety, Effectiveness of Safety Management. | Safety | Explanation | In the Performance Monitoring Report 2015 the EoSM score for Denmark state level were calculated to 51. Since no changes have been made and taking into account comment #7 we think that the “verified” score of 42 may be erroneous. | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> |

12.RP2 Fact Validation - Comment Registry Sweden

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|-----------------|--|---|--|
| 1 | Page 208. Section "3. Focus on en-route at State /Charging Zone level". First sentence. | COST-EFFICIENCY | Typo | Some decimals are missing "670,.." shall be 670.71) | Thank you for your comment. The value will be corrected. |
| 2 | Page 208. Section "3. Focus on en-route at State /Charging Zone level". | COST-EFFICIENCY | factual | It's wrong to say that the en-route costs were higher than planned as the main analysis. It should be clarified that the reason for this cost increase is due to higher pension cost because of the low interest rates at the moment. | Thank you for your comment. The analysis at State/Charging Zone level will be amended to highlight the fact that the costs in 2015 were higher than planned due to the higher pension costs resulting from the low interest rates at the moment. |

13.RP2 Fact Validation - Comment Registry FAB CE

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|---|---|---|
| 1 | Compliance issues relating to FAB capacity incentive scheme (page 223) | CAPACITY | Factual mistake and consistency | details on Croatian section | Will address in Croatian section. |
| 2 | Result of FAB Capacity Incentive Scheme p223 "a FAB PONDER of 25% to be applied for the three States that surpassed their national capacity target: Austria, Czech Republic and Slovenia." | | factual mistake | Hungary surpassed its national capacity target as well. Wording should be corrected "a FAB PONDER of 25% to be applied for the three States that surpassed their national capacity target as well as the 3 pp dead band: Austria, Czech Republic and Slovenia." | Thank you for your comment, the document will be updated accordingly. |

14.RP2 Fact Validation - Comment Registry Austria

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|--|--|--|
| 1 | Austria – Monitoring of SAFETY for 2015 (p.229); Effectiveness of Safety Management - State Level; Score | SAFETY | factual/mistake | The score 58 for EoSM on State Level does not comply with the score 56 as submitted by Austria. This has to be corrected accordingly, since evidences cannot be provided. Annex to ED Decision 2014-035-R states that the results of States' questionnaires are to be verified by means of Agency standardisation inspections. The Annex furthermore states that the outcome of standardisation inspections/oversight is not designed to be used for corrections of the scores towards a higher level of implementation. Besides the verification outcome for 2015 has not yet been provided to Austria. | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> <p>EASA increased the score based on the wording of the response not on the outcome of the standardisation inspection. The NSA answer implies that the process is managed on a formal basis as it is detailed in NSA Guidance material.</p> |

15.RP2 Fact Validation - Comment Registry Croatia

| # Comment | Chapter/Section/Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|-------------------------------------|---|----------------------|--|----------------------------|---|------|------|------|------|---------------------|------|------|------|--------------------|------|------|------|-------------------|----------------|------|------|------|-----------------|------|------|------|--------|------|-----|------|----------------|------|------|------|--------|------|------|------|------------------|------|------|------|-------------------------------------|-------------|-------------|-------------|
| 1 | Compliance issues relating to FAB capacity incentive scheme (page 223) | Capacity | Factual mistake and consistency | *comments are listed below | <p>Thank you for your comments which are noted by the PRB. The PRB agrees that the FAB-CE targets for en route capacity are consistent with the official FAB-CE reference values. However, using the same methodology as applied to all Member States, and FABs, in 2014, the PRB has calculated the aggregation of the individual national capacity performances (STATFOR baseline forecast Feb 2014, IFR flights per FIR.)</p> <table border="1"> <thead> <tr> <th>Year</th> <th>2015</th> <th>2016</th> <th>2017</th> </tr> </thead> <tbody> <tr> <td>FAB reference value</td> <td>0.30</td> <td>0.29</td> <td>0.29</td> </tr> <tr> <td>Revised FAB target</td> <td>0.29</td> <td>0.29</td> <td>0.28</td> </tr> <tr> <td rowspan="5">ANSP contribution</td> <td>Austro Control</td> <td>0.21</td> <td>0.21</td> <td>0.20</td> </tr> <tr> <td>Croatia Control</td> <td>0.23</td> <td>0.22</td> <td>0.21</td> </tr> <tr> <td>ANS CR</td> <td>0.09</td> <td>0.1</td> <td>0.09</td> </tr> <tr> <td>HungaroControl</td> <td>0.06</td> <td>0.05</td> <td>0.05</td> </tr> <tr> <td>LPS SR</td> <td>0.10</td> <td>0.10</td> <td>0.10</td> </tr> <tr> <td>Slovenia Control</td> <td>0.21</td> <td>0.21</td> <td>0.22</td> </tr> <tr> <td>Aggregated ANSP contribution</td> <td>0.31</td> <td>0.30</td> <td>0.29</td> </tr> </tbody> </table> <p>The PRB notes that the aggregation of the ANSP contributions are greater than the Revised FAB target for each year of the reference period.</p> | Year | 2015 | 2016 | 2017 | FAB reference value | 0.30 | 0.29 | 0.29 | Revised FAB target | 0.29 | 0.29 | 0.28 | ANSP contribution | Austro Control | 0.21 | 0.21 | 0.20 | Croatia Control | 0.23 | 0.22 | 0.21 | ANS CR | 0.09 | 0.1 | 0.09 | HungaroControl | 0.06 | 0.05 | 0.05 | LPS SR | 0.10 | 0.10 | 0.10 | Slovenia Control | 0.21 | 0.21 | 0.22 | Aggregated ANSP contribution | 0.31 | 0.30 | 0.29 |
| Year | 2015 | 2016 | 2017 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| FAB reference value | 0.30 | 0.29 | 0.29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Revised FAB target | 0.29 | 0.29 | 0.28 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ANSP contribution | Austro Control | 0.21 | 0.21 | 0.20 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | Croatia Control | 0.23 | 0.22 | 0.21 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | ANS CR | 0.09 | 0.1 | 0.09 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | HungaroControl | 0.06 | 0.05 | 0.05 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | LPS SR | 0.10 | 0.10 | 0.10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Slovenia Control | 0.21 | 0.21 | 0.22 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Aggregated ANSP contribution | 0.31 | 0.30 | 0.29 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 2 | The PRB notes that no response was provided to the compliance issue that the aggregation of the national targets was not consistent with the FAB targets. (Croatia monitoring report; page 249) | Capacity | Factual mistake and consistency | *comments are listed below | <p>The PRB notes the request for consistent information from both the PRB and NM. The roles of both entities are very different and whilst the NM focuses on operational units such as ACCs, the PRB is concerned with national obligations, therefore it refers to flight information regions (FIRs) rather than the areas of responsibility of individual ATS units. This will invariably result in differences in presentation of data and reporting of statistics.</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 3 | Monitoring of Airports Contribution – Croatia (page 248) | Airports Contributio | General | *comments are listed below | <p>Thank you for your comment. Member States can include airports with less than 70000 IFR movements in their TCZ –</p> | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|---|--|-------------------|---------|----------------------------|---|
| | | n to ENVIRONM ENT | | | and we understand that this is the case for Croatia TCZ where two airports are included. Even if Lucko was not identified as subject to RP2 in the Performance Plan, when identifying it as one of the two airports in the TCZ, it becomes object of the RP2 Operational Monitoring. Clarification on the number of movements in Lucko and the representativity of the statistics is added. |
| 4 | Monitoring of en-route and terminal cost-efficiency (page 251-259) | COST-EFFICIENCY | General | *comments are listed below | Noted. |

1. & 2. Chronology

* Commission implementing decision (EU) 2015/348 from 2 March 2015 considers the key performance area of cost-efficiency for Croatia is consistent with the relevant Union-wide performance target as follows:

Also the Commission implementing decision (EU) 2015/347 from 2 March 2015 considers the key performance area of capacity for Croatia not consistent with the relevant Union-wide performance target as follows:

“Article 3

The performance targets in the **key performance area of capacity submitted by** the Czech Republic, **Croatia**, Hungary, Austria, Slovenia and Slovakia as regards FABCE, by Belgium, Germany, France, Luxembourg and the Netherlands as regards FABEC, by Greece, Italy, Cyprus and Malta as regards Blue Med FAB, by Bulgaria and Romania as regards Danube FAB and by Spain and Portugal as regards SW FAB **should be revised downwards**. As a minimum, those targets should be in accordance with the respective FAB reference values set out in the Network Operations Plan. Where the Network Operations Plan specifies remediation or mitigation measures, account should be taken of those measures when revising the performance targets.”

As a result, Croatia as part of FAB CE submitted a revised Performance Plan in the area of capacity and after assessment period PRB issued “PRB Assessment Report of RP2 FAB Revised Performance Targets – FAB CE” from 16.10.2015 and opinion was as follows: (3. Capacity, 3.1. En-route delay level):

“3.1.2 The revised FAB CE targets are consistent with the respective FAB reference values.

3.1.3 The FAB CE has adopted targets that will provide a performance surplus that could be of benefit to the network.

3.1.4 The Network Operations Plan 2015-2019 (March 2015 edition) shows how the FAB CE ANSPs can provide a significant positive contribution to network performance by implementing the existing capacity plans. Such a positive contribution could benefit airspace users within the FAB CE and other FABs in meeting the overall target of 0.5 minutes per flight.

3.1.5 The aggregated contribution expected from the individual ANSPs is not consistent with the overall FAB targets for en-route capacity performance. “

After receiving the document, we provided our comments to PRB and the whole document is published on following web site:

<http://www.eusinglesky.eu/Documents/PRB%20Reports/Reference%20Period%20Two/RP2+Assessment+of+the+revised+plans+-+comment+registry+-+sent+to+PRB.pdf>

Chapter 3 Capacity /Section 3.1 En-route delay level / Para 3.1.5

Factual mistake and consistency

FAB CE/Croatia comment:

We disagree and we would appreciate to have further explanation from PRB side concerning the statement in the point 3.1.5 and relevant table 3: Individual ANSP contributions to the FAB reference value within the Article Additional information provided on the page 7 – Contribution of individual ANSPs to FAB performance (Annex II, 3.4).

In the European Network Operational Plan (Edition Number: 1.3 and 1.4) FAB reference values needed to match the European delay target for any year of the planning period are defined. Corresponding delay reference values for all the ANSPs are also defined in the NOP.

In revised FAB CE Performance Plan ANSP's contributions to FAB capacity targets for all ANSP's are equal to or below their reference values. Consequently, it is not expected that with the same calculation as used in NOP and ANSP's contributions equal to or below the corresponding ANSP's reference values to have aggregated ANSP contribution (at FAB CE level) which exceeds the FAB reference values.

PRB response (09.10.2015)

The calculation of consistency of ANSP contributions is not based on the NOP delay forecast, but instead is calculated using the ANSP contribution values provided by the Member states in the FAB performance plans.

The NOP refers to a delay forecast which compares expected traffic with the current ANSP capacity plans.

Difference between these figures would indicate that the ANSP contributions, provided in the performance plan are not based on the current capacity plans, or, as in this case, that the individual ANSP contribution is not consistent with the FAB target.

The submitted assessment to the SSC 58th meeting includes as follows (Presentation item 3.2. Performance scheme SSC58):

“Revised capacity targets:

It appears that capacity targets of FABCE and DAVUBE FAB have been revised in line with the recommendations so that their targets are consistent with the Union-wit targets.”

The COMMISSION IMPLEMENTING DECISION (EU) 2016/599 of 15 April 2016 was as follows:

“(7) Concerning the key performance area of capacity, the consistency of the revised targets submitted by the Member States concerned for en route Air Traffic Flow Management (ATFM) delay has been assessed, in accordance with the principle laid down in point 4 of Annex IV to Implementing Regulation (EU) No 390/2013, by using the **respective FAB reference values for capacity that, when applied, ensure at Union level that the Union-wide performance target is met, calculated by the Network Manager and set out in the Network Operations Plan (2014-2018/2019) in its most recent version of June 2014 ('Network Operations Plan')**. **That assessment has demonstrated that the revised targets submitted by Czech Republic, Croatia, Hungary, Austria, Slovenia and Slovakia as regards FABCE**, Spain and Portugal as regards SW FAB and Bulgaria and Romania as regards Danube FAB **are consistent** with the relevant Union-wide performance target.”

And FAB CE targets are as follows: 0,29 (2015); 0,29 (2016); 0,28 (2017); 0,28 (2018); 0,27 (2019).

Regarding the statement “The compliance issue concerned the fact that the ANSP contribution was not consistent with the FAB targets or the FAB reference value.”

FAB CE capacity targets based on reference values are calculated by the Network Manager and set out in NOP of June 2014 and are assessed as consistent. Delay reference values for all the ANSPs that corresponds to FAB reference values are also defined in the NOP and also calculated by NM. In revised FAB CE Performance Plan ANSP's contributions to FAB capacity targets for all ANSP's are equal to or below their reference values as defined in NOP. Consequently, it is not expected that with the same calculation as used in NOP and ANSP's contributions equal to or below the corresponding ANSP's reference values to have aggregated ANSP contribution (at FAB CE level) which exceeds the FAB reference values.

Additionally, aggregation of ANSP contribution, as defined in Revised PP, into the revised FAB target was done by NM and the values received from NM were included in revised PP.

Since the reference values and calculations were done by NM and published in NOP as stated in Commission Decision we recommend to the PRB to organise further discussion on this issue and especially regarding technical details (used FIR and FAB traffic figures) on PRU-NM level and to delete all comments which are related to this “nonconsistency”.

3. Monitoring of Airports Contribution - Croatia

Another issue is the question of inclusion into the Monitoring report of “small” airports which are not listed in the List of airports for RP2 especially under List of airports submitted to the Performance Regulation in the approved PP.

Croatia did not identify airport Lučko as a subject to RP2 (as stated in the report), and consequently it should not be a part of FAB CE PP and monitoring process.

Eventually, if Lučko has to be included in FAB CE PP as a subject to RP2, we kindly ask the inclusion of the followings:

- airport Lucko (LDZL) is NTL, VFR airport;
- according to CCL's statistics, in 2015 in Lucko 4 operations were recorded, one of which missed the slot (75%);
- it has to be stated that the number of operations in airport Lučko (LDZL) is generally low and the statistic results are under question.

4. Monitoring of en-route and terminal cost-efficiency - Croatia

According to Mrs Capart's email from 5th of September 2016, we will provide our comments in the area of cost-efficiency by 16th of September 2016.

16.RP2 Fact Validation - Comment Registry Czech Republic

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------------|--|--|----------------------|
| | Page 270, part 8 – En-route DUC 2015 vs. Actual... | COST- EFFICIENCY | < factual mistake > | < please replace HRK with CZK in line 3> | Noted and corrected. |

17.RP2 Fact Validation - Comment Registry Hungary

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------|--|-----------|---|
| 1 | Hungary Monitoring Report PRB observations regarding national capacity incentive scheme p284 "The PRB notes that no response was provided to the compliance issue that the aggregation of the national targets were not consistent with the FAB targets." | CAPACITY | factual mistake | see below | Thank you for your comment. Although the specified Commission decision reports compliance of the FAB targets with the FAB-CE reference values, it does not refer to the local targets for en route capacity, which (as explained to Croatia above) when aggregated remain inconsistent with the stated FAB wide targets for each year of RP2. |

Comment No 2.

COMMISSION IMPLEMENTING DECISION (EU) 2016/599 of 15 April 2016:

"(7) Concerning the key performance area of capacity, the consistency of the revised targets submitted by the Member States concerned for en route Air Traffic Flow Management (ATFM) delay has been assessed, in accordance with the principle laid down in point 4 of Annex IV to Implementing Regulation (EU) No 390/2013, by using the **respective FAB reference values for capacity that, when applied, ensure at Union level that the Union-wide performance target is met, calculated by the Network Manager and set out in the Network Operations Plan (2014-2018/2019) in its most recent version of June 2014 ('Network Operations Plan')**. **That assessment has demonstrated that the revised targets submitted by Czech Republic, Croatia, Hungary, Austria, Slovenia and Slovakia as regards FABCE**, Spain and Portugal as regards SW FAB and Bulgaria and Romania as regards Danube FAB **are consistent** with the relevant Union-wide performance target."

And FAB CE targets are as follows: 0,29 (2015); 0,29 (2016); 0,28 (2017); 0,28 (2018); 0,27 (2019).

Regarding the statement "The compliance issue concerned the fact that the ANSP contribution was not consistent with the FAB targets or the FAB reference value."

FAB CE capacity targets based on reference values are calculated by the Network Manager and set out in NOP of June 2014 and are assessed as consistent. Delay reference values for all the ANSPs that corresponds to FAB reference values are also defined in the NOP and also calculated by NM. In revised FAB CE Performance Plan ANSP's contributions to FAB capacity targets for all ANSP's are equal to or below their reference values as defined in NOP. Consequently, it is not expected that with the same calculation as used in NOP and ANSP's contributions equal to or below the corresponding ANSP's reference values to have aggregated ANSP contribution (at FAB CE level) which exceeds the FAB reference values.

Additionally, aggregation of ANSP contribution, as defined in Revised PP, into the revised FAB target was done by NM and the values received from NM were included in revised PP.

Since the reference values and calculations were done by NM and published in NOP as stated in Commission Decision we recommend to the PRB to organise further discussion on this issue and especially regarding technical details (used FIR and FAB traffic figures) on PRU-NM level and to delete all comments which are related to this "inconsistency".

18.RP2 Fact Validation - Comment Registry Slovakia

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------|---|---------|----------|
| | | | | | |

19.RP2 Fact Validation - Comment Registry Slovenia

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|-----------------|---|---|--|
| 1 | Page 318, table 6. En-route costs exempt from cost sharing, last line "Total costs exempt from cost sharing" | COST-EFFICIENCY | Factual mistake | Should not be -6, but -7: ECTL costs from PP 1.743.000 EUR, actual 1736.365 EUR, difference 6.635 EUR | The amount of total costs exempt from cost sharing is indeed -7 €'000, in nominal terms. In the table, in part 6, the amount is expressed in 2009 prices. For more information please also see the reader's guide. |
| 2 | Page 319, table 9. Focus on ANSP, pre-last line "Gain/Loss to be retained by the ATSP in respect to incentives" | COST-EFFICIENCY | Factual mistake | Should not be 37, but 40: Incentive scheme Capacity for Slovenia in 2015 is 39.661 EUR, see as well page 315, meaning 40 not 37, consequently next line -790 should be changed to -787. | See comment above. Same reasoning applies. Amounts are presented in €2009 in the PRB Monitoring Report. |
| 3 | Compliance issues relating to FAB capacity incentive scheme (page 223) | CAPACITY | Factual mistake and consistency | Support comments of Croatia. *see their justification | Thank you for your comment. Please note the response to Croatia. |
| 4 | The PRB notes that no response was provided to the compliance issue that the aggregation of the national targets was not consistent with the FAB targets. (Slovenia monitoring report; page 315) | CAPACITY | Factual mistake and consistency | Support comments of Croatia *see their justification | Thank you for your comment. Please note the response to Croatia. |

20.RP2 Fact Validation - Comment Registry FABEC

| # Comment | Chapter/Section/Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------------------------------|--|--|--|
| 1 | FABEC, Safety, p. 329, FAB level ground score application of RAT on RIs | Safety | Factual mistake | Value of 96% should be corrected to 95% as reported in the monitoring report submitted by FABEC | No change. The ATM ground value for RIs for FABEC of 96% is correct, based on the data submitted via AST by FABEC Member States. |
| 2 | FABEC Monitoring of the environment for 2015 330 | ENVIRONM ENT | General | An analysis concerning HFE deterioration in 2015 is ongoing within FABEC and one issue has already been identified: the optimum flight plans (shortest routes) proposed by the Network Manager are also increasing since June 2015 which directly affects the KEP and indirectly the KEA. In addition, an increase of the sample rate for the radar data provided to EUROCONTROL, while increasing the quality of the data provided, had a negative impact on the KEA 2015 result. Without that change, the FABEC would have met the target. Methodological issues with HFE/KEA computation exist and are being discussed. | Thank you for your comment which has been noted by the PRB. |
| 3 | FABEC, Environment, p. 330, KEA Actual performance value | ENVIRONM ENT | factual mistake | The FAB actual value provided by FABEC in its Monitoring Report 2015 is 3,36% | Thank you for your comment. The PRB is constantly reviewing the accuracy of the indicators and reacting to queries or anomalies highlighted by stakeholders. One such anomaly was due to switch over between SSR codes and resulted in double trajectories with variation in KEA. The data was recalculated, with the approval of the European Commission and the corrected figure was updated on the performance dashboard. |
| 4 | FABEC, Environment | Airports Contribution to ENVIRONM ENT | general | Please provide (exact) sources to the data used for the PRB Report. Figures added by PRB can neither be checked nor retraced. | Thank you for your comment. The data for additional ASMA and TXOT comes from the data submitted by the airports through the Airport Operator Data Flow. This data can be found also in the PRU dashboard: ansperformance.eu |
| 5 | FABEC, Capacity | Capacity | general | Please provide (exact) sources to the data used for the PRB report. Figures added by PRB can neither be checked nor retraced. | Thank you for your comment, please contact the PRU directly for the requested information. |

| | | | | | |
|----|---|----------------------------------|------------|--|---|
| 6 | FABEC, p.333, § application of corrective measures for Capacity, paragraph 4 | Capacity | Update | At the time when the monitoring report will be published the “on going social negotiation” has ended and the agreement implementing described measures has been signed 19th July 2016. This should be mentioned. | Thank you for your comment, the achievements for 2016 will be mentioned in the 2016 annual monitoring report, if referred to in the FABEC report for 2016. |
| 7 | FABEC, p.335 § Result of FAB capacity incentive scheme | Capacity | Additional | 78% share of CRSTMP delays vs all causes delays has been, it has been explained to users during consultation meetings. This ratio has been historically observed at FABEC level during period with large systems training, validation and implementation (e.g. Germany with Vafortit implementation phase by DFS and MUAC prior 2010) | Thank you for your comment. Consultation with airspace users does not exempt States and FABs from the requirements of the performance and charging Regulations, including demonstration of consistency with the FAB and union-wide targets for capacity. |
| 8 | FABEC, Capacity, p. 335, Result of FAB Capacity Incentive Scheme, 3rd Box, dealing with incentive scheme methodology and previous years’ performance | Capacity | general | The determination of an incentive scheme is an issue exclusively to be dealt with in the Performance Plan adoption process. This is no subject to be dealt with in a Monitoring Report handling the execution of an adopted or provisional Performance Plan in the way of monitoring annual performance values. This box should therefore be deleted from the PRB Report. | Thank you for your comment. The PRB insists on addressing compliance issues in the monitoring exercise. |
| 9 | FABEC, Capacity, p. 335, Compliance issues related to FAB incentive scheme | Capacity | general | As described in Comment #4 this should be deleted. In addition, statement “neither of these outstanding compliance issues have been addressed in the FABEC monitoring report” is not acceptable : it has been collectively decided in NCP and agreed by EC that the compliance issues will be addressed out of the monitoring channel and related chapters of the monitoring template was adapted to reflect such agreement. States are still expecting a formal letter of EC on this dedicated point. | Thank you for your comment. The PRB insists on addressing compliance issues in the monitoring exercise. The EC has despatched formal lettres regarding compliance issues relating to the incentive scheme in a letter dated 25 October 2016, with the EC reference: MOVE/E3/AZ-hb Ares (2016) 6621262 |
| 10 | FABEC, Capacity, p. 335/336, Update on military dimension of the plan + PRB Observations on Military dimension of the plan + Application of FUA + PRB Observation of the Application of FUA | CAPACITY | general | When being consistent with the FABEC Monitoring Report these explanations do rather belong to the Reports` Environment Pls #3, 4, 5 than to the Capacity chapter. | Thank you for your comment which has been noted by the PRB. |
| 11 | FABEC, p.336 § PRB observations of the application of FUA | CAPACITY | Mistake | The statement that “information provided by FABEC... does not refer to an annual review...” is not exact. The national SES reports sent to EASA by NSAs 1st February are annual reports describing precisely how Member States implement FUA. This should be corrected. | Thank you for your comment. The EASA reports relate to compliance only not performance or how the FUA has been implemented, as referred to in Annex V 1.1 (j) of Regulation 390/2013.. |
| 12 | FABEC, Airport Contribution to Capacity, p. 337, 2. Arrival ATFM Delay | Airport Contribution to Capacity | general | Graph used in this box is unknown and needs to be supplemented by the relevant source. Otherwise it can neither be checked nor retraced. | Thank you for your comment. This graph shows the aggregated arrival ATFM delay per FAB, based on all airports in that FAB subject to RP2. Raw data can be found also in the PRU dashboard: ansperformance.eu Clarifying text shall be added to the document. |

| | | | | | |
|----|--|----------------------------------|---------|---|--|
| 13 | FABEC, Airport Contribution to Capacity, p. 337, 3rd box named "7. Arrival ATFM-Delay – [...]" | Airport Contribution to Capacity | typo | There seems to be a typo in the numbering. | Thank you for your comment. The numbering is revised and corrected. |
| 14 | FABEC, FABEC, Airport Contribution to Capacity, p. 337, 3. ATFM Slot adherence | Airport Contribution to Capacity | general | Poor quality and labelling of the graph. As a result one can not see what was intended to be shown by it. | Thank you for your comment. The objective of this graph is to show at a glance the performance of the airports belonging to FABEC within the global scenario. The details (the data) are available in the Appendix of the FABEC (and other FABs) states, where the figures for every airport are provided. |

21.RP2 Fact Validation - Comment Registry Belgium

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|-------------------|--|--|--|
| 1 | BELGIUM, Safety, p.341, EoSM, State level | Safety m Impacted | Factual mistake | Score: 62% is wrong and must be replaced with 69% Source: FABEC Monitoring report 2015 | No change. EoSM Score of 62 is correct. The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores. |
| 2 | BELGIUM, Safety, p.341, EoSM, State level | Safety | General | From where is the information on the state level (except for the score) coming from? No information from Belgium was provided on that level. Replace all the letters with N/A | No change. EoSM Maturity Level for each State is defined as lowest level achieved per each EoSM Component. The maturity level of each component is derived from the level achieved in the EoSM questionnaire. Results are coming from EASA based questionnaire as per AMC/GM, and later reviewed after EASA verification in the Standardisation visits to the State. Target for EoSM at both State and FAB level is defined per each EoSM Component as minimum level achieved. Hence information on State level must be provided. |
| 3 | BELGIUM, Safety, p.341, EoSM, Belgocontrol | Safety | Factual mistake | Safety Risk Management: E is wrong and must be replaced by D Safety Promotion: C is wrong and must be replaced by D Source: FABEC Monitoring report 2015 | No change. Belgocontrol result for Safety Risk Management: is Level E as per submitted questionnaire to EASA (ANSPs level results were verified by their competent authorities and submitted to EASA) and computed per AMC/GM. nd for Safety Promotion is Level C. ANSPs level results were verified by their competent authorities and submitted to EASA, and may not reflect the self-assessment by the ANSP. |
| 4 | BELGIUM, Safety, p.341, RAT, State level | Safety | Factual mistake | ATM-S: 85% is wrong and must be replaced by 83% Source: FABEC Monitoring report 2015 | Accepted. Figures have been updated accordingly. The value for ATM-S for ATM Overall is 83%. |

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|----|--|--------------------------------------|--------------------------------|---|--|
| 5 | BELGIUM, Environment, p.343, appendix, Charleroi | Airports Contribution to ENVIRONMENT | General | From where is the information for Charleroi coming from? No information from Belgium was provided. Additional ASMA TIME and ADDITIONAL TAXI-OUT TIME must be n/a | Thank you for your comment. The data is provided directly by CRL airport through the APDF. Our contact point there is Cristophe Coeymans. |
| 6 | BELGIUM, Capacity, p.348, appendix | Capacity | Factual mistake | Brussels SLOT ADHERENCE must be 0.95 and not 0.94 Liège SLOT ADHERENCE must be 0.82 and not 0.81 Ostend-Bruges SLOT ADHERENCE must be 0.79 and not 0.86 Antwerp AVG PRE-DEPARTUTE DELAY must be 0.05 and not n/a Liège AVG PRE-DEPARTUTE DELAY must be 0.85 and not n/a Ostend-Bruges AVG PRE-DEPARTUTE DELAY must be 0.07 and not n/a Source: FABEC Monitoring report 2015 | Thank you for your comment. Slot adherence is calculated annually and as annual aggregation for all flights at those airports. The correct indicators (0.94, 0.81 and 0.86) cannot be achieved by calculating the average of the monthly indicators (which would provide the 0.95, 0.82 and 0.79). Pre departure delay is calculated based on the available data submitted through the APDF. This data flow is not established at the moment for any of those 3 airports (Antwerp, Liege and Ostend-Bruges). |
| 7 | BELGIUM, en-route COST-EFFICIENCY, p.350, En-route DUC 2015 vs. 2015 Unit Rate charged to users | COST-EFFICIENCY | Factual mistake | The unit rate revised retroactively was 68.71€ and not 68.76€ Source: Reporting tables 2015 | The latest version of the RTs, including all the proposed changes, leads to a UR of 68.76€. However these changes are still pending the approval of Belgium. |
| 8 | BELGIUM, en-route COST-EFFICIENCY, p.350, En-route DUC 2015 vs. 2015 Unit Rate charged to users | COST-EFFICIENCY | General | Determined costs for the ATSEP at cost sharing level plus at traffic risk sharing level are higher than the total determined costs. Incoherency must be corrected | The determined costs expressed in nominal term are the same for the cost-sharing and traffic risk sharing in nominal terms but expressed in real terms with a different inflation. These amounts should not be added. |
| 9 | BELGIUM, en-route COST-EFFICIENCY, p.352, Focus on en-route ATSP: General conclusions , Belgocontrol overall estimated surplus for the en-route activity + BELGIUM, terminal COST-EFFICIENCY , p.358, Focus on terminal ATSP: General conclusions Belgocontrol 2015 overall estimated surplus for the terminal activity in the TCZ | COST-EFFICIENCY | General comment on methodology | Comment on the methodology for calculating the gain/loss on the En route and Terminal – Brussels activities: - Cost and traffic risk should rather be considered over the whole reference period, and not in one specific year. Art. 14 of the charging regulation stipulates that the cost risk has to be calculated over the whole reference period and not on a yearly basis. Traffic and cost risk have to be managed within a reference period, not within a single year. Some cost cutting measures may have a one shot effect, others may affect several years. - A risk premium was added to the cost of capital to cope with risk sharing (only in the En route activity). The risk free part of the cost of capital however, serves to finance our investment with own capital and should not be taken into account to calculate the gain on the En route and Terminal – Brussels activities. | Monitoring is an activity on an annual basis. - The Coc that was used in the DCs includes the risk premium and should be used in the computation of the gain of the activities. |
| 10 | BELGIUM, en-route COST-EFFICIENCY, p.352, Focus on en-route ATSP: General conclusions | COST-EFFICIENCY | Additional comments | About lower depreciation costs: May be completed with “mainly explained by delay in the investments in the previous years” | Noted. Monitoring amended. |
| 11 | BELGIUM, Antwerpen terminal COST-EFFICIENCY, p.354, Focus on terminal ATSP: General | COST-EFFICIENCY | Comments included in Belgian | Staff costs: Reductions in staff numbers in RP1 have an impact on the staff costs in 2015. Total staff reduced by -132 in RP1 and increased by 10 in 2015. Moreover the planned | Noted. Monitoring amended. |

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| | conclusions | | reporting | recruitment of new ATCOs was delayed. Depreciation: This is mainly explained by delay in the investments foreseen. Cost of capital: This is mainly explained by a 'low interest rate' environment which has impacted the yield on state bonds (10 years bonds). This actual rate is now quite lower than the one foreseen in the budget. Source: Terminal Additional Information | |
| 12 | BELGIUM, Brussels terminal COST-EFFICIENCY, p.356, Terminal DUC 2015 vs 2015 Actual Unit Cost for users | COST-EFFICIENCY | Misunderstanding | Slight precision as Terminal Brussels costs are financed <u>both by airspace users and State</u> : "The inflation adjustment corresponds to the impact of a lower than planned inflation index for the year 2015, and the forthcoming reimbursement to airspace users in 2017, and to the State . The traffic adjustment reflects the gain due to higher traffic than planned in 2015 which will be reimbursed to airspace users in 2017, and to the State ." | Noted. Monitoring amended. |
| 13 | BELGIUM, Charleroi terminal COST-EFFICIENCY, p.360, Focus on terminal ATSP: General conclusions | COST-EFFICIENCY | Comments included in Belgian reporting | Staff costs: Reductions in staff numbers in RP1 have an impact on the staff costs in 2015. Total staff reduced by -132 in RP1 and increased by 10 in 2015. Moreover the planned recruitment of new ATCOs was delayed. Depreciation: This is mainly explained by delay in the investments foreseen. Cost of capital: This is mainly explained by a 'low interest rate' environment which has impacted the yield on state bonds (10 years bonds). This actual rate is now quite lower than the one foreseen in the budget. Source: Terminal Additional Information | Noted. Monitoring amended. |
| 14 | BELGIUM, Liège terminal COST-EFFICIENCY, p.362, Focus on terminal ATSP: General conclusions | COST-EFFICIENCY | Comments included in Belgian reporting | Staff costs: Reductions in staff numbers in RP1 have an impact on the staff costs in 2015. Total staff reduced by -132 in RP1 and increased by 10 in 2015. Moreover the planned recruitment of new ATCOs were delayed. Depreciation: This is mainly explained by delay in the investments foreseen. Cost of capital: This is mainly explained by a 'low interest rate' environment which has impacted the yield on state bonds (10 years bonds). This actual rate is now quite lower than the one foreseen in the budget. Source: Terminal Additional Information | Noted. Monitoring amended. |
| 15 | BELGIUM, Liège terminal COST-EFFICIENCY, p.364, Focus on terminal ATSP: General conclusions | COST-EFFICIENCY | Comments included in Belgian reporting | Staff costs: Reductions in staff numbers in RP1 have an impact on the staff costs in 2015. Total staff reduced by -132 in RP1 and increased by 10 in 2015. Moreover the planned recruitment of new ATCOs was delayed. Depreciation: This is mainly explained by delay in the | Noted. We assumed it was relating to Oostende – Brugge. Monitoring amended. |

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| | | | <p>investments foreseen.</p> <p>Cost of capital: This is mainly explained by a 'low interest rate' environment which has impacted the yield on state bonds (10 years bonds). This actual rate is now quite lower than the one foreseen in the budget.</p> <p>Source: Terminal Additional Information</p> | |
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22.RP2 Fact Validation - Comment Registry France

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---|--|--|---|
| 1 | FRANCE, p.373 Table Effectiveness of Safety Management | Safety | Mistake | FABEC monitoring report State level Score is 68 and not 64. | No change. The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores. |
| 2 | FRANCE, p.373 Table Application of RAT | Safety | Mistake | FABEC monitoring report ATM overall RAT application for RI is 97% and not 96%, for ATM-S it is 86% and not 85 | No change. The values for ATM Overall for RIs is 97% and ATM Overall for ATM-S is 86% are correct and presented in the report based on the data submitted via AST. by FR |
| 3 | FRANCE, all tables with airports list (p. 375-376, 381-382) | Airports Contribution to ENVIRONMENT | mistake | Airport list is not correct : airports name have been corrected and correct names transmitted : see French airports list in revised FABEC Performance Plan (1.5) | Thank you for bringing this to our attention. The names of the airports have been corrected. |
| 4 | FRANCE, p.377 Table En route Capacity incentive scheme | CAPACITY | Mistake | Actual performance for France is 0.86 for 2015, and not 0.84 (see FABEC monitoring report). | Thank you for your comment. The figure presented is as presented in the official SES-performance dashboard and relates to all IFR flights within the French FIRs in the EUR region. It is possible that the flights operating to and from the Channel Islands (within Brest FIR) have been omitted from the unofficial FABEC figures. |
| 5 | FRANCE, p.380 Chapter Monitoring of airports contribution to capacity for 2015, 1. overview | Monitoring of airports contribution to capacity | Question | Statement regarding non establishment of data flows in some French airports and that priority should be given on airports with a yearly movement of more than 37500 flights should justify this level of 37500 flights? Currently regulation stipulates that airports under 70000 movements can be kept out of the scheme... Additionally France questions the added value of such a costly dataflow from airports which impact on the national performance is very limited. | France did list originally 61 airports as subject to RP2 (c.f. FABEC performance plan, note one of the airports was closed after the performance plan submission). It is correct that IR390 entails the clause that States may waive the application of the regulation for airports with a yearly traffic count of less than 70.000 movements. Equally States may choose to apply the regulation to airports with lower traffic. The fact that France listed - as part of the FABEC performance plan -61 airports subject to RP2 implies the application of the regulation to those airports. |

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| | | | | | <p>A rough analysis of the yearly traffic count and the contribution of the airport to the national level of arrival ATFM delay suggest that out of this high number of airports (i.e. 61) a reasonable contribution from a performance scheme perspective can be anticipated from airports with the suggested count of 37.500 flights.</p> <p>As France correctly challenges the utility of applying the regulation to smaller airports, France would need to revise the list of airports subject to RP2 as listed in the FABEC performance plan. Alternatively, France may opt for an approach chosen by Portugal that groups airports with lower impact on the national performance into one "aggregated" group for which a group threshold will be established.</p> <p>Accordingly:</p> <p>If France remains the list of airports subject to RP2, the proposed threshold for implementing the data flow is for airports with a yearly traffic count of more than 37.500 flights follows the argument of establishing a data flow for airports that contribute to the national level.</p> <p>No monitoring effort would be spent on the airports with less traffic.</p> <p>If France revises the list of airport subject to RP2, it is assumed that this comprises airports that have an impact on the national performance. Equally, the requirement to establish the airport operator data flow would apply to these airports.</p> |
| 6 | FRANCE, p.380 Chapter Monitoring of airports contribution to capacity for 2015, 2. Arrival ATFM delays | Monitoring of airports contribution to capacity | Mistake | LFPO delay is 0.96 min/flight and not 0.95 (see FABEC monitoring report). | Thank you for your comment. The PRB report indicated 0.96 min/flight. The mentioned 0.95 min/flight cannot be retrieved. |
| 7 | FRANCE, p.386 & 390 Chapters En route charging zone and Terminal charging zone | Cost efficiency | General | <p>Differences are computed between actual and determined costs in real 2009 euros using different inflation figures to deflate the nominal values. This is puzzling.</p> <p>The interpretation made by PRB of this notion of estimated embedded surplus that is used in each annual reporting is misleading. It makes it a mercantile interpretation giving the impression that ANSPs and / or States voluntarily generate margins by gaming when setting cost efficiency targets during the drafting of the plans. This is an abusive interpretation: DSNA for example, has no shareholders and the estimated ex-post return on equity enables the ANSP to develop an increasing self-financing capacity that is useful given its ambitious investment program.</p> <p>In addition, these supposed gains come from either virtuous</p> | <p>We take note of your comments.</p> <p>We would like to underline that the Report for France clearly indicates <i>"a significant part of the 2015 cost-sharing gain for France en-route Charging Zone is due to postponement of payments that are likely to affect negatively future years' surpluses."</i></p> <p>Also, please note that the explanations given in the additional information relating to both en-route and terminal reporting tables, in respect of the differences between actual and determined costs are duly recorded in the analysis (Box 12).</p> |

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| | | | <p>cost savings, and then they are welcomed and inherent in the spirit of a good economic regulation system on the medium long terms perspective; or they are the results of investments cancellation or postponement and credits cancellation to deal with traffic / revenues drawbacks or difficulties arising from over-ambitious targets. In such a case those "surplus" will be anyway used again later, counter cycle, at the expense of future performance.</p> <p>The explanations given in the additional information related to en-route or terminal EUROCONTROL tables with the details and rationale regarding those lower costs shall be recorded here in order to give the full information for a good understanding and analysis.</p> | |
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23.RP2 Fact Validation - Comment Registry Germany

| # Comment | Chapter/Section/Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|--|---|---|
| 1 | GERMANY, Safety, p. 395, EoSM; Score State Level | Safety | factual mistake | wrong: 55% ->correct:67% source: FABEC Monitoring Report 2015 | No change. The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores. |
| 2 | GERMANY, Airports contribution to Environment, p. 396, 1. Overview and GERMANY, Airports contribution to Environment, p. 396, 2. Additional taxi-out time | Airports contribution to Environment | factual mistake | As regards the Taxi-out performance the PRB report shows a value of 3,11 min/dep. for EDDM. In fact the FABEC Report showed a value of 2,98 and stated as a comment that the PRU DB showed a value of 3,02. Please use data of the FABEC Report or at least explain the difference. In addition it is of major importance and was already stated several times in the past, that data reporting and applying actors (PRU, ECTL, and PRB) should cooperate much more to generate more data quality and as a result prevent such a situation of three different values. | Thank you for bringing this to our attention. The data was provided later and the indicator had not yet been updated. Value is now corrected. |
| 3 | GERMANY, Airports contribution to Environment, p. 397, 3. Additional ASMA Time | Airports contribution to Environment | general | The stated average ASMA time for Germany being 1.66 min/arr. cannot be verified since data of PRB and Germany is diverging and PRB sources are unknown. | Thank you for your comment. The text will be updated removing any reference to the national average. |
| 4 | GERMANY, Airports contribution to Environment, p. 397, 4. Appendix | Airports contribution to Environment | general | Values for ASMA EDDM and add. Taxi-out time EDDM are not in line with the values of the FABEC Monitoring Report. ASMA EDDM should read 1,62 while Taxi-out time should read 2,98/3,02 (see comment #2 as well). In addition relevant statements noting data inconsistencies were not respected. These concerns as regards Taxi-out time EDDL, EDDM and as regards ASMA EDDB, EDDN, EDDP, EDDV. | Thank you for bringing this to our attention. Values shall be corrected. |
| 5 | GERMANY, Capacity, p. 398, En route Capacity incentive scheme, observations | Capacity | factual | Data used for the incentive calculation was of PRU (http://ansperformance.eu/data/) as stated in chapter 1.3 of the FABEC Monitoring Report so PRB should be able to validate the results independently. | Thank you for your comment. The PRB is unable to independently verify that the delay causes as declared by the ANSP requesting the regulation were actually the reason for the capacity constraint. The fact that the ANSP being regulated is solely responsible for determining the cause of |

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| | | | | | delay has been highlighted as a risk by the PRB in the past. | | | | | | | | | | | | | | | | | | | | |
| 6 | GERMANY, Capacity, p. 398, En route Capacity incentive scheme, 2015 actual performance | Capacity | typo/factual | The actual performance for all causes, as given by the FABEC Report, was 0,21 min/flight. | Thank you for your comment. The data used is from the official SES- performance dashboard and includes all IFR flights through German FIRs and all delays assigned to en-route reference locations in Germany. | | | | | | | | | | | | | | | | | | | | |
| 7 | GERMANY, Capacity, p. 398, 399, 400, PRB observations regarding national capacity performance | Capacity | general | We would appreciate the mentioning of the source for the values used for as well as the labelling of the six graphs in a much more precise way. Otherwise we cannot verify them. | Thank you for your comment. The capacity graphs have been calculated using capacity plans for individual ACCs presented in the respective Network Operation Plans. | | | | | | | | | | | | | | | | | | | | |
| 8 | GERMANY, Airport contribution to Capacity, p. 401, 1. Overview, 1st Sentence | Airport contribution to Capacity | factual | Germany did break the national arrival ATFM delay target down to local level, namely airport level, for monitoring purposes. | Thank you for your comment. The document shall be updated | | | | | | | | | | | | | | | | | | | | |
| 9 | GERMANY, Airport contribution to Capacity, p. 402, 6. Appendix | Airport contribution to Capacity | typo | For slot adherence please use the exact values as provided in the FABEC monitoring report and a uniform rounding methodology as regards especially EDDP and EDDW. | Thank you for bringing this to our attention. EDDW slot adherence value shall be corrected. | | | | | | | | | | | | | | | | | | | | |
| 10 | GERMANY, Capacity, p. 400, Planning and Effective Use of CDRs + PRB Observations on Planning and Effective Use of CDRs | Capacity | general | This is no Capacity PI but Environment PIs #4, 5 in the FABEC Monitoring Report. | Thank you for your comment which has been noted by the PRB. | | | | | | | | | | | | | | | | | | | | |
| 11 | GERMANY, Capacity, p. 400, Effective booking procedures + PRB observations on Effective booking procedures | Capacity | general | This is no Capacity PI but Environment PI#3 in the FABEC Monitoring Report. | Thank you for your comment which has been noted by the PRB. | | | | | | | | | | | | | | | | | | | | |
| 12 | GERMANY, Cost Efficiency, En-route charging zone, p. 404, "8. En-route DUC 2015 vs. 2015 Actual Unit Cost for users" | Cost Efficiency | typo (?) | Has there maybe been any rounding for the "Total Adjustment", because we have calculated -1.13 € instead of -1.12 € and following this 82.39 € instead of 82.40 € and -1.4% instead of -1.3%? | Thank you for your comment. As you already indicate your calculation has been done using the figures rounded showed in the in the graph. We just have displayed 2 decimals for formatting and visual purposes. But the "total adjustment" i.e. -1.12 € is fully accurate since is calculated without rounding in it components as you can see below: | | | | | | | | | | | | | | | | | | | | |
| | | | | | <table border="1"> <tr> <td>2015 DUC</td> <td>83.52021</td> </tr> <tr> <td>Other revenues</td> <td>0</td> </tr> <tr> <td>Inflation adjustment</td> <td>-1.027339</td> </tr> <tr> <td>Traffic risk sharing adjustment (additional)</td> <td>0</td> </tr> <tr> <td>Traffic risk sharing adjustment (loss)</td> <td>0</td> </tr> <tr> <td>Traffic adjustment (no risk)</td> <td>-0.067625</td> </tr> <tr> <td>Bonus/penalty</td> <td>-0.02859</td> </tr> <tr> <td>Costs exempt from risk sharing</td> <td>0</td> </tr> <tr> <td>Total adjustments</td> <td>-1.123554</td> </tr> <tr> <td>2015 CUR</td> <td>82.39666</td> </tr> </table> | 2015 DUC | 83.52021 | Other revenues | 0 | Inflation adjustment | -1.027339 | Traffic risk sharing adjustment (additional) | 0 | Traffic risk sharing adjustment (loss) | 0 | Traffic adjustment (no risk) | -0.067625 | Bonus/penalty | -0.02859 | Costs exempt from risk sharing | 0 | Total adjustments | -1.123554 | 2015 CUR | 82.39666 |
| 2015 DUC | 83.52021 | | | | | | | | | | | | | | | | | | | | | | | | |
| Other revenues | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Inflation adjustment | -1.027339 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic risk sharing adjustment (additional) | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic risk sharing adjustment (loss) | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic adjustment (no risk) | -0.067625 | | | | | | | | | | | | | | | | | | | | | | | | |
| Bonus/penalty | -0.02859 | | | | | | | | | | | | | | | | | | | | | | | | |
| Costs exempt from risk sharing | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Total adjustments | -1.123554 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2015 CUR | 82.39666 | | | | | | | | | | | | | | | | | | | | | | | | |

| 13 | GERMANY, Cost Efficiency, En-route charging zone, p. 404, “8. En-route DUC 2015 vs. 2015 Actual Unit Cost for users” | Cost Efficiency | factual mistake | The text mentions cost exempts from cost-sharing adjustments amounting to -1.91 €. Where does this figure come from? Is this a typing error? | Thank you for your comment. Yes it is a typo error. The text has been corrected accordantly. Apologies for the typo errors, but since we got DFS actual data with delay there was not time for a detail review of this first version of report. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|------|--|-----------------------------|-----------------|--|---|--|--|-----------------------------|--|--|--|--|--|------|------|------|---------|------|----------------|---------|---------|---------|---------|------|---------|---------|---------|---------|---------|------|------------|---------|---------|---------|---------|------|--------------|---------|---------|---------|---------|------|---------|---------|---------|---------|---------|------|-----------|---------|---------|---------|---------|------|------------|---------|---------|---------|---------|------|-------------------|--------|--------|--------|--------|------|----------|--------|--------|--------|--------|------|---------------|--------|--------|--------|--------|------|----------|--------|--------|--------|--------|------|--------|--------|--------|--------|--------|------|---------|--------|--------|--------|--------|------|-------------------|--------|--------|--------|--------|------|-------------|--------|--------|-------|--------|------|---------------|-------|-------|-------|-------|
| 14 | GERMANY, Cost Efficiency, En-route charging zone, p. 406, “12. Focus on en-route ATSP: General Conclusions” | Cost Efficiency | factual mistake | The text mentions “slightly lower depreciation costs (-0.7% or -0.05 M€2009)”. This figure “-0.05 M€” is probably a typing error and should be -0.54 M€? Could you please recheck this. | Thank you for your comment. Yes it is a typo error. The text has been corrected accordantly. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 15 | GERMANY, Cost Efficiency, Terminal charging zone, p. 407, “1. Contextual economic Information” | Cost Efficiency | general | Could you please give us a feedback where the count by airport size comes from? Is this the data from the Performance Plan? We would also propose to note the source of this data in the template. | <p>Airports are classified based on the number of IFR air transport movements calculated as the yearly average over the three calendar years preceding the submission of the performance plan (i.e. 2011-2013) as foreseen in the Performance (ref. Article 2(5)) and Charging Regulation (ref. Article 2(9)).</p> <p>These averages for German airports are:</p> <table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="4">IFR air transport movements</th> </tr> <tr> <th colspan="2"></th> <th>2011</th> <th>2012</th> <th>2013</th> <th>Average</th> </tr> </thead> <tbody> <tr> <td>EDDF</td> <td>FRANKFURT MAIN</td> <td>487 020</td> <td>482 167</td> <td>472 704</td> <td>480 630</td> </tr> <tr> <td>EDDM</td> <td>MUNCHEN</td> <td>407 061</td> <td>395 297</td> <td>379 212</td> <td>393 857</td> </tr> <tr> <td>EDDL</td> <td>DUSSELDORF</td> <td>221 196</td> <td>216 770</td> <td>210 386</td> <td>216 117</td> </tr> <tr> <td>EDDT</td> <td>BERLIN-TEGEL</td> <td>167 012</td> <td>168 926</td> <td>172 801</td> <td>169 580</td> </tr> <tr> <td>EDDH</td> <td>HAMBURG</td> <td>148 930</td> <td>144 539</td> <td>136 751</td> <td>143 407</td> </tr> <tr> <td>EDDK</td> <td>KOLN/BONN</td> <td>127 736</td> <td>122 807</td> <td>117 299</td> <td>122 614</td> </tr> <tr> <td>EDDS</td> <td>STUTT GART</td> <td>123 891</td> <td>120 053</td> <td>114 179</td> <td>119 374</td> </tr> <tr> <td>EDDB</td> <td>BERLIN/SCHONEFELD</td> <td>71 086</td> <td>69 228</td> <td>63 201</td> <td>67 838</td> </tr> <tr> <td>EDDV</td> <td>HANNOVER</td> <td>69 949</td> <td>67 118</td> <td>63 904</td> <td>66 990</td> </tr> <tr> <td>EDDP</td> <td>LEIPZIG/HALLE</td> <td>61 956</td> <td>60 376</td> <td>59 438</td> <td>60 590</td> </tr> <tr> <td>EDDN</td> <td>NURNBERG</td> <td>57 413</td> <td>53 515</td> <td>51 781</td> <td>54 236</td> </tr> <tr> <td>EDDW</td> <td>BREMEN</td> <td>36 686</td> <td>35 338</td> <td>34 821</td> <td>35 615</td> </tr> <tr> <td>EDDC</td> <td>DRESDEN</td> <td>27 633</td> <td>25 611</td> <td>22 251</td> <td>25 165</td> </tr> <tr> <td>EDDG</td> <td>MUNSTER/OSNABRUCK</td> <td>24 430</td> <td>19 655</td> <td>16 317</td> <td>20 134</td> </tr> <tr> <td>EDDR</td> <td>SAARBRUCKEN</td> <td>12 148</td> <td>10 231</td> <td>9 794</td> <td>10 724</td> </tr> <tr> <td>EDDE</td> <td>ERFURT-WEIMAR</td> <td>6 291</td> <td>4 531</td> <td>4 867</td> <td>5 230</td> </tr> </tbody> </table> <p>You can also find this information in the FAB EC Performance Plan (see “Pre-filled information” worksheet).</p> <p>We take note as well of your comment and we will study how to include the source of this data in the next year Monitoring template. For this year there is no space available in box 1. <i>Contextual economic information: terminal air navigation services</i> where to include this reference.</p> | | | IFR air transport movements | | | | | | 2011 | 2012 | 2013 | Average | EDDF | FRANKFURT MAIN | 487 020 | 482 167 | 472 704 | 480 630 | EDDM | MUNCHEN | 407 061 | 395 297 | 379 212 | 393 857 | EDDL | DUSSELDORF | 221 196 | 216 770 | 210 386 | 216 117 | EDDT | BERLIN-TEGEL | 167 012 | 168 926 | 172 801 | 169 580 | EDDH | HAMBURG | 148 930 | 144 539 | 136 751 | 143 407 | EDDK | KOLN/BONN | 127 736 | 122 807 | 117 299 | 122 614 | EDDS | STUTT GART | 123 891 | 120 053 | 114 179 | 119 374 | EDDB | BERLIN/SCHONEFELD | 71 086 | 69 228 | 63 201 | 67 838 | EDDV | HANNOVER | 69 949 | 67 118 | 63 904 | 66 990 | EDDP | LEIPZIG/HALLE | 61 956 | 60 376 | 59 438 | 60 590 | EDDN | NURNBERG | 57 413 | 53 515 | 51 781 | 54 236 | EDDW | BREMEN | 36 686 | 35 338 | 34 821 | 35 615 | EDDC | DRESDEN | 27 633 | 25 611 | 22 251 | 25 165 | EDDG | MUNSTER/OSNABRUCK | 24 430 | 19 655 | 16 317 | 20 134 | EDDR | SAARBRUCKEN | 12 148 | 10 231 | 9 794 | 10 724 | EDDE | ERFURT-WEIMAR | 6 291 | 4 531 | 4 867 | 5 230 |
| | | IFR air transport movements | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | 2011 | 2012 | 2013 | Average | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDF | FRANKFURT MAIN | 487 020 | 482 167 | 472 704 | 480 630 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDM | MUNCHEN | 407 061 | 395 297 | 379 212 | 393 857 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDL | DUSSELDORF | 221 196 | 216 770 | 210 386 | 216 117 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDT | BERLIN-TEGEL | 167 012 | 168 926 | 172 801 | 169 580 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDH | HAMBURG | 148 930 | 144 539 | 136 751 | 143 407 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDK | KOLN/BONN | 127 736 | 122 807 | 117 299 | 122 614 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDS | STUTT GART | 123 891 | 120 053 | 114 179 | 119 374 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDB | BERLIN/SCHONEFELD | 71 086 | 69 228 | 63 201 | 67 838 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDV | HANNOVER | 69 949 | 67 118 | 63 904 | 66 990 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDP | LEIPZIG/HALLE | 61 956 | 60 376 | 59 438 | 60 590 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDN | NURNBERG | 57 413 | 53 515 | 51 781 | 54 236 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDW | BREMEN | 36 686 | 35 338 | 34 821 | 35 615 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDC | DRESDEN | 27 633 | 25 611 | 22 251 | 25 165 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDG | MUNSTER/OSNABRUCK | 24 430 | 19 655 | 16 317 | 20 134 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDR | SAARBRUCKEN | 12 148 | 10 231 | 9 794 | 10 724 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| EDDE | ERFURT-WEIMAR | 6 291 | 4 531 | 4 867 | 5 230 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 16 | GERMANY, Cost Efficiency, Terminal charging zone, p. 407, “3. Focus on terminal at | Cost Efficiency | factual mistake | The text mentions “the resulting gain of terminal revenues (-2.2 M€2009)”. This figure “-2.2 M€” is probably a typing error and should be +2.2 M€? Could you please recheck this. | Thank you for your comment. Yes it is a typo error. The text has been corrected accordantly. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|--|---|-----------------|----------|--|---|----------|---------|----------------|---|----------------------|-----------|--|---|--|---|------------------------------|-----------|---------------|----------|--------------------------------|---|-------------------|-----------|-----------------|-----------------|
| | State/Charging Zone level" | | | | | | | | | | | | | | | | | | | | | | | | |
| 17 | GERMANY, Cost Efficiency, Terminal charging zone, p. 408, "8. Terminal DUC 2015 vs. 2015 Actual Unit Cost for users" | Cost Efficiency | typo (?) | Has there maybe been any rounding for the "Total Adjustment", because we have calculated -1.59 € instead of -1.58 €? | <p>Thank you for your comment. As you already indicate your calculation has been done using the figures rounded showed in the in the graph. We just have displayed 2 decimals for formatting and visual purposes. But the "total adjustment" i.e. -1.58 € is fully accurate since is calculated without rounding in it components as you can see below:</p> <table border="1"> <tr> <td>2015 DUC</td> <td>180.776</td> </tr> <tr> <td>Other revenues</td> <td>0</td> </tr> <tr> <td>Inflation adjustment</td> <td>-2.219137</td> </tr> <tr> <td>Traffic risk sharing adjustment (additional)</td> <td>0</td> </tr> <tr> <td>Traffic risk sharing adjustment (loss)</td> <td>0</td> </tr> <tr> <td>Traffic adjustment (no risk)</td> <td>-0.075365</td> </tr> <tr> <td>Bonus/penalty</td> <td>0.711958</td> </tr> <tr> <td>Costs exempt from risk sharing</td> <td>0</td> </tr> <tr> <td>Total adjustments</td> <td>-1.582543</td> </tr> <tr> <td>2015 CUR</td> <td>179.1934</td> </tr> </table> | 2015 DUC | 180.776 | Other revenues | 0 | Inflation adjustment | -2.219137 | Traffic risk sharing adjustment (additional) | 0 | Traffic risk sharing adjustment (loss) | 0 | Traffic adjustment (no risk) | -0.075365 | Bonus/penalty | 0.711958 | Costs exempt from risk sharing | 0 | Total adjustments | -1.582543 | 2015 CUR | 179.1934 |
| 2015 DUC | 180.776 | | | | | | | | | | | | | | | | | | | | | | | | |
| Other revenues | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Inflation adjustment | -2.219137 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic risk sharing adjustment (additional) | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic risk sharing adjustment (loss) | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Traffic adjustment (no risk) | -0.075365 | | | | | | | | | | | | | | | | | | | | | | | | |
| Bonus/penalty | 0.711958 | | | | | | | | | | | | | | | | | | | | | | | | |
| Costs exempt from risk sharing | 0 | | | | | | | | | | | | | | | | | | | | | | | | |
| Total adjustments | -1.582543 | | | | | | | | | | | | | | | | | | | | | | | | |
| 2015 CUR | 179.1934 | | | | | | | | | | | | | | | | | | | | | | | | |
| 18 | GERMANY, Cost Efficiency, Terminal charging zone, p. 410, "12. Focus on terminal ATSP: General conclusions" | Cost Efficiency | typo (?) | In the last paragraph there it is mentioned that "the surplus embedded in the cost of capital (+9.0 M€2009) amounts to +22.9 M€2009 (10.7% of the 2015 terminal revenues)." Has there maybe been any rounding for the terminal value, because we have calculated 22.8 M€2009 instead of 22.9 M€2009? | Thank you for your comment. Yes it is a typo error. The text has been corrected accordantly. | | | | | | | | | | | | | | | | | | | | |
| 19 | GERMANY, Cost Efficiency, Gate-To-Gate, p. 411, "2. Share of en-route and terminal in gate-to-gate actual costs (2015)" | Cost Efficiency | typo (?) | For the estimated gate-to-gate economic surplus 2015 the text mentions 115.5 M€2009. Has there maybe been any rounding, because we have calculated 115.6 M€2009 instead of 115.5 M€2009? | Thank you for your comment. Yes it is a typo error. The text has been corrected accordantly. | | | | | | | | | | | | | | | | | | | | |

24.RP2 Fact Validation - Comment Registry Luxembourg

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|------------------|--|---------|----------|
| 1 | | | | | |

25.RP2 Fact Validation - Comment Registry Netherlands

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response | | | | | | | | | | |
|-----------|--|---------------|---|---|---|-----|----|---|---|---|---|---|---|----|---|
| 1 | THE NETHERLANDS, Safety, p. 421, State level EoSM score | SAFETY | Factual mistake | Value of 59 should be corrected to 61, as reported in the monitoring report submitted by FABEC | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> | | | | | | | | | | |
| 2 | THE NETHERLANDS, Safety, p. 421, LVNL score Safety Policy and Objectives | SAFETY | Factual mistake | Value of C should be corrected to D, as reported in the monitoring report submitted by FABEC | <p>No change.</p> <p>The result for Safety Policy and Objectives for LVNL is Level C as per submitted questionnaire to EASA and computed per AMC/GM. ANSPs level results were verified by their competent authorities and submitted to EASA, and may not reflect the self-assessment by the ANSP.</p> | | | | | | | | | | |
| 3 | THE NETHERLANDS, Safety, p. 421, State level JC questions, policy and its implementation | SAFETY | Factual mistake | Value of 8-1 (yes-no) should be corrected to 7-2, as reported in the monitoring report submitted by FABEC | <table border="1"> <thead> <tr> <th>YES</th> <th>NO</th> </tr> </thead> <tbody> <tr> <td>8</td> <td>1</td> </tr> <tr> <td>7</td> <td>0</td> </tr> <tr> <td>1</td> <td>1</td> </tr> <tr> <td>16</td> <td>2</td> </tr> </tbody> </table> <p>Accepted.</p> <p>Figures have been updated accordingly.</p> | YES | NO | 8 | 1 | 7 | 0 | 1 | 1 | 16 | 2 |
| YES | NO | | | | | | | | | | | | | | |
| 8 | 1 | | | | | | | | | | | | | | |
| 7 | 0 | | | | | | | | | | | | | | |
| 1 | 1 | | | | | | | | | | | | | | |
| 16 | 2 | | | | | | | | | | | | | | |
| 4 | THE NETHERLANDS, Safety, p. 329; Safety, p. 421 | SAFETY | General | Please provide (exact) sources to the data used for the PRB Report. Discrepancies between this report and data submitted by FABEC create additional workload. | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> | | | | | | | | | | |
| 5 | THE NETHERLANDS, p. 425 | CAPACITY | General | Planning and effective use of CDRs and effective boeing procedures refer to environment PIs and should be reported in the appropriate section. | <p>Thank you for your comment which has been noted by the PRB.</p> | | | | | | | | | | |

26.RP2 Fact Validation - Comment Registry Switzerland

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|--|--|---|
| 1 | SWITZERLAND Additional ASMA Time pages 331 & 441 | Airports Contribution to ENVIRONMENT | Mistake | <p>Comparing airports performance based on the sole <u>number of movements</u> is misleading. Exploring factors such as <u>the type of operational environment</u> should be taken into account instead.</p> <p>For instance, the location and the operational environment of an airport should be reflected. Indeed, the fact that Geneva and Zürich are located in a mountainous terrain, has a major impact than other airports with similar number of movements.</p> | Thank you for your comment which is noted. PRB will take the observation into account in future studies. |
| 2 | SWITZERLAND Additional ASMA Time pages 331 & 441 | Airports Contribution to ENVIRONMENT | Mistake | Methodological issues with Additional ASMA Time need to be discussed with the PRU, especially with regard to reference unimpeded times values. The latter can vary as much a 1 sec depending on when it is taken. Such uncertainty makes any comparison too hazardous and Additional AMSA values shouldn't be given with a +/- 1 sec. rather than +/- 0.01 sec. as it is the case here. | Thank you for your comment which is noted. This is an ongoing discussion and no final decision has been made. |
| 3 | SWITZERLAND Page 439, Volume 2 – Local Overview, Switzerland, Effectiveness of Safety Management | SAFETY | Mistake | Skyguide “Safety Assurance”: D (instead of C). | <p>No change.</p> <p>The result for Safety Assurance for Skyguide is Level C as per submitted questionnaire to EASA and computed per AMC/GM. ANSPs level results were verified by their competent authorities and submitted to EASA, and may not reflect the self-assessment by the ANSP.</p> |
| 4 | SWITZERLAND Page 439 | SAFETY | Mistake | EoSM- State level Score: The PRB report shows a value of 66 and the Monitoring Report 76. Where 66 do comes from? | <p>No change.</p> <p>The Volume 2 final EoSM results are reflecting EoSM score after EASA verification, where some answers were downgraded and the score re-calculated. As indicated in pre-filled template, May 2016 State EoSM results were only self-assessment scores.</p> |
| 5 | SWITZERLAND P. 442, National capacity incentive scheme: “Skyguide's broken down target was set at 0.07 min/flight.” | CAPACITY | Mistake | Skyguide's broken down target was set at 0.17 min/flight. Please correct it. | Thank you for your comment. The PRB is happy to update the document accordingly. |

| | | | | | |
|----|---|----------|-----------------------------|--|---|
| 6 | SWITZERLAND P. 442 - 443, PRB observations regarding national capacity performance, Capacity (Geneva ACC and Zürich ACC) | CAPACITY | General | The PRB is not taking into account current performance level in its assessment of the planning capacity. If it were the case then it would have been observed that even a significant traffic disruption would have a manageable impact on delays (when compared to ANSP delay target). | Thank you for your comment. It is noticeable that FABEC did not meet its required capacity performance target for 2015. The PRB notes furthermore that, what may be considered a 'manageable impact' on delays in Switzerland could have greater ramifications for FABEC. |
| 7 | SWITZERLAND P. 442-443, PRB observations regarding national capacity performance, Capacity (Geneva and Zurich ACC) | CAPACITY | Mistake | Please correct, Geneva FIR and Zürich FIR for Geneva ACC and Zürich ACC. | Thank you for your comment. The capacity plans refer to the ACC, since they are extracted from the Network Operations Report compiled by the Network Manager. |
| 8 | SWITZERLAND Volume 2 – Switzerland / Monitoring of Capacity 2015 / <u>PRB Observations on Planning and Effective Use of CDRs / page 443</u> | CAPACITY | Mistake | The statement (quote) " <i>since there are no CDRs within its airspace</i> " is wrong. Switzerland has in fact many CDRs. Please Correct | Thank you for your comment. The PRB is happy to update the document accordingly. |
| 9 | SWITZERLAND Volume 2 – Switzerland / Monitoring of Capacity 2015 / <u>Planning and effective use of CDRs / page 443</u> | CAPACITY | General | PRB writes (quote) " <i>No data was provided at national (or FAB) level</i> ". However, having data on actual use of CDR is, at this stage, not possible. This missing data is under the NM's remits which should have to provide it to States and FAB in order to assess the real performance of FUA. | Thank you for your comment which has been noted by the PRB. |
| 10 | SWITZERLAND Volume 2 – Switzerland / Monitoring of Capacity 2015 / <u>PRB Observations on Planning and Effective Use of CDRs / page 443</u> | CAPACITY | General | PRB writes (quote) " <i>Switzerland, like many other States, does not monitor the planning and effective use of CDRs</i> ". However, having data on actual use of CDR is, at this stage, not possible. This missing data is under the NM's remits which should have to provide it to States and FAB in order to assess the real performance of FUA. | Thank you for your comment which has been noted by the PRB. |
| 11 | SWITZERLAND Volume 2 – Switzerland / Monitoring of Capacity 2015 / <u>PRB Observations on Effective booking procedures / page 443</u> | CAPACITY | Clarification | PRB writes (quote) " <i>No details were provided on which segregated or restricted areas were considered for the calculation of effective booking procedures. Therefore it is impossible to gauge whether or not this information is based exclusively on those areas which impact either available ATC capacity or available route options.</i> " <u>Clarification:</u> <ul style="list-style-type: none"> Unlike preceding years, the template delivered by the PRB didn't allow for multiple areas reporting. It had only 1 field available to report an aggregated value for all areas. In Switzerland, all segregated or restricted areas were considered for the calculation of effective booking procedures as they are all supposed to have an impact on ATC capacity or route options. | Thank you for your comment. The document will be updated accordingly and hopefully the reporting template will be improved for next year. |
| 12 | SWITZERLAND Volume 2 – Switzerland / Monitoring of Capacity 2015 / <u>PRB Observations</u> | CAPACITY | Missing additional comments | Following additional comments made by Switzerland in the reporting template are missing and not considered in this draft annual monitoring report : | Thank you for these comments, the PRB is happy to update the document accordingly. |

| | | | | | |
|----|---|------------------|---------|--|---|
| | on Effective booking procedures / page 443 | | | <p>-Swiss AMC introduced UUP by August 2015 (Trial phase). Rolling UUP and Proc 3 have been introduced by 01.01.2016.</p> <p>-Swiss AUPs are made up of airspace allocations for civil and military missions and also for ASM/ATC purposes. Civil missions represented 8% of all the missions contained in the AUPs.</p> <p>-Airspace is very often released at tactical level (ASM level 3), however tactical releases are yet not always recorded in ASM systems and also not always notified to the NM.</p> | |
| 13 | SWITZERLAND p. 444, 5. Pre-departure delay | CAPACITY-airport | Typo | While Zürich (LSZH) shows a high level of pre-departure... | Thank you for these comments, the PRB is happy to update the document accordingly. |
| 14 | SWITZERLAND p. 444, 5. Average Pre-departure delay &Appendix | CAPACITY-airport | General | A definition is needed to be able to check the values. | Thank you for your comment. The values for pre-departure delay are provided by the airports through the APDF, please contact the PRU directly for additional information. |
| 15 | SWITZERLAND FABEC Monitoring of en-route Cost-efficiency 2015 page 446 box 8 | COST-EFFICIENCY | factual | <p>Traffic adjustment stated in the document is -0.02 but it should be -0.04.</p> <p><u>Detail of skyguide's calculation:</u> En-route Reporting table June 2016, Route Table 2, item 3.12 + 4.8 divided by actual 2015 traffic (item 2.2) → $-(18.457 \text{ KCHF} + 38.278 \text{ KCHF}) / 1'454.786 \text{ KSU} = -0.04$</p> <p>If item 3.12 is not included under "traffic adjustment" it should be under "traffic risk sharing adjustment"</p> | <p>Thanks for your comment but your calculation is not correct for the purposes of what Box 8 shows. This is the adjustments required to calculate the Actual Unit Cost for airspace Users (AUC-U) for 2015 (in national currency in nominal terms). This reflects the unit cost that airspace users genuinely incur in respect of the activities performed in 2015.</p> <p>Item 3.12 is not included for 2 reasons. First 3.12 is actually related to Over/under recoveries from traffic variations from previous years to be carried-over (therefore not from activities related 2015). Additionally all items under item 3 are related to traffic risk sharing adjustment. As you well mention that is why we have to include item 3 in the "traffic risk sharing adjustment" but only the amounts related to 2015 activity i.e. item 3.10 and item 3.11.</p> <p>For the "traffic adjustment" we have to use only item 4.1 because if you use 4.8, as you suggest in your calculation, then again you are counting carry overs from previous years included in items 4.2 and 4.2 and therefore not incurred in 2015.</p> |
| 16 | SWITZERLAND FABEC Monitoring of en-route Cost-efficiency 2015 page 447 box 10 | COST-EFFICIENCY | factual | <p>Estimated proportion of financing through debt (in %) 2015P to 2019P used in this table is not in line with the determined data we provided in the additional information in June 2016 on page 2/13. Please update the % of debt and equity accordingly.</p> <p>The % used in box 10 of the Terminal part (page 451) are correct.</p> | Thanks for your comment. The % of debt and equity provided in the report is calculated based on the standard guides. We take note of your of your comment and as agreed by phone, finally no changed is required since it has not significant impact. |

| | | | | The actual 2015 % are also not in line with the additional information provided in June 2016. % of debt is 36.1% Please update the % of debt and equity accordingly. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|--|-----------------|---------|---|---|------|--|--------|---------------------------|--------|----------------------------|-------|----------------------------------|--------|--|--------------|--|------------|---|--------------|-------------------------------------|-------|------------------|--------|---------------------------------|--------|-------------------------------------|--------|-------------------------------|--------|-----------------------------------|--------|-------------------------|-------|----------------|--------|--|--------------|---|--------------|--|---------------|---|-------------|----------------------------------|-------------|---|
| 17 | SWITZERLAND FABEC Monitoring of en-route Cost-efficiency 2015 page 447 box 9 | COST-EFFICIENCY | General | <p>The Net ATSP gain on en-route activity of 2'833 k€2009 doesn't represent the gain that skyguide will retain. In the 2015 actual costs we deducted the TEN-T revenues which we should give back to users (2.220MCHF / 1.481M€ 2009). As the NSA report on costs exempt doesn't allow us to declare this amount, we did not include it in the NSA cost exempt. In our accounts we included this amount in the carry-forward generated in 2015. In our 2015 Annual Report on p.4, the balance carried forward includes the TEN-T revenues. Therefore the 7.6% of estimated ex-post RoE pre-tax rate mentioned in Box 10 of p.447 doesn't reflect the real gain retained by skyguide. The estimated ex-post RoE is 5.1% as calculated below. Please consider this comment.</p> <table border="1"> <thead> <tr> <th>Gain on en-route activity ('000 €2009)</th> <th>2015</th> </tr> </thead> <tbody> <tr> <td>Determined costs ATSP (PP) - planned inflation</td> <td>89'375</td> </tr> <tr> <td>Actual costs for the ATSP</td> <td>86'519</td> </tr> <tr> <td>Difference in costs (gain)</td> <td>2'856</td> </tr> <tr> <td>Amount to be reimbursed to users</td> <td>-1'633</td> </tr> <tr> <td>Gain in respect of cost sharing</td> <td>1'223</td> </tr> <tr> <td>Gain in respect of traffic risk sharing</td> <td>129</td> </tr> <tr> <td>Net ATSP gain on en-route activity</td> <td>1'352</td> </tr> </tbody> </table> <table border="1"> <thead> <tr> <th>ATSP estimated surplus ('000 €2009)</th> <th>2015A</th> </tr> </thead> <tbody> <tr> <td>Total asset base</td> <td>86'563</td> </tr> <tr> <td>estimated proportion equity (%)</td> <td>63.87%</td> </tr> <tr> <td>estimated proportion equity (value)</td> <td>55'285</td> </tr> <tr> <td>estimated proportion debt (%)</td> <td>36.13%</td> </tr> <tr> <td>estimated proportion debt (value)</td> <td>31'278</td> </tr> <tr> <td>Cost of capital (value)</td> <td>2'164</td> </tr> <tr> <td>Determined RoE</td> <td>2.643%</td> </tr> <tr> <td>Estimated surplus cost of capital</td> <td>1'461</td> </tr> </tbody> </table> <table border="1"> <tbody> <tr> <td>Overall estimated surplus for en-route</td> <td>2'814</td> </tr> <tr> <td>Revenue/costs for the en-route activity</td> <td>89'353</td> </tr> <tr> <td>Estimated surplus in % of revenues</td> <td>3.1%</td> </tr> <tr> <td>Estimated ex-post RoE (%)</td> <td>5.1%</td> </tr> </tbody> </table> | Gain on en-route activity ('000 €2009) | 2015 | Determined costs ATSP (PP) - planned inflation | 89'375 | Actual costs for the ATSP | 86'519 | Difference in costs (gain) | 2'856 | Amount to be reimbursed to users | -1'633 | Gain in respect of cost sharing | 1'223 | Gain in respect of traffic risk sharing | 129 | Net ATSP gain on en-route activity | 1'352 | ATSP estimated surplus ('000 €2009) | 2015A | Total asset base | 86'563 | estimated proportion equity (%) | 63.87% | estimated proportion equity (value) | 55'285 | estimated proportion debt (%) | 36.13% | estimated proportion debt (value) | 31'278 | Cost of capital (value) | 2'164 | Determined RoE | 2.643% | Estimated surplus cost of capital | 1'461 | Overall estimated surplus for en-route | 2'814 | Revenue/costs for the en-route activity | 89'353 | Estimated surplus in % of revenues | 3.1% | Estimated ex-post RoE (%) | 5.1% | After a phone conversation it was agreed to amend the 2016 Reporting Tables in order to better reflect this issue. In the updated RT there is a change in the actual 2015 costs (skyguide) to remove the deduction of ten-T fundings which were netted off in the previous version. The 2015 Monitoring report will be updated accordingly. |
| Gain on en-route activity ('000 €2009) | 2015 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Determined costs ATSP (PP) - planned inflation | 89'375 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Actual costs for the ATSP | 86'519 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Difference in costs (gain) | 2'856 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Amount to be reimbursed to users | -1'633 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gain in respect of cost sharing | 1'223 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Gain in respect of traffic risk sharing | 129 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Net ATSP gain on en-route activity | 1'352 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| ATSP estimated surplus ('000 €2009) | 2015A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Total asset base | 86'563 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| estimated proportion equity (%) | 63.87% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| estimated proportion equity (value) | 55'285 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| estimated proportion debt (%) | 36.13% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| estimated proportion debt (value) | 31'278 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Cost of capital (value) | 2'164 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Determined RoE | 2.643% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated surplus cost of capital | 1'461 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Overall estimated surplus for en-route | 2'814 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Revenue/costs for the en-route activity | 89'353 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated surplus in % of revenues | 3.1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Estimated ex-post RoE (%) | 5.1% | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| 18 | SWITZERLAND FABEC Monitoring of en-route Cost-efficiency 2015 page 448 box 12, part "Actual 2015 Skyguide en-route costs | COST-EFFICIENCY | General | Comment on: "We note there is a lack of information about the reported actual 2015 costs". As mentioned in the additional paper we provided in June 2016, we explained that the costs were below plan because of some elements that | As mentioned above the 2016 RTs have been amended and the Monitoring report updated accordingly. Although the differences now are lower, between the actuals costs and the determined, the comment about the lack of justification is | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

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|----|--|-----------------|---------|---|--|
| | vs.PP" | | | were deducted from the cost base as for example the TEN-T revenues mentioned above. The costs in 2015 are at plan level. | still valid since there are no explanations, in neither the additional information to the RTs or the NSA Monitoring report, about these differences. |
| 19 | SWITZERLAND FABEC Monitoring of terminal Cost-efficiency 2015 page 450 box 8 | COST-EFFICIENCY | factual | <p>Traffic adjustment stated in the document is -0.16 but it should be +0.05.</p> <p><u>Detail of skyguide's calculation:</u> Terminal Reporting table June 2016, Route Table 2, item 3.12 + 4.8 divided by actual 2015 traffic (item 2.2) → $-(56.584 \text{ KCHF} + 44.043 \text{ KCHF}) / 266.955 \text{ KSU} = 0.05$</p> <p>If item 3.12 is not included under "traffic adjustment" it should be under "traffic risk sharing adjustment"</p> | <p>Thanks for your comment but your calculation is not correct for the purposes of what Box 8 shows. This is the adjustments required to calculate the Actual Unit Cost for airspace Users (AUC-U) for 2015 (in national currency in nominal terms). This reflects the unit cost that airspace users genuinely incur in respect of the activities performed in 2015. Item 3.12 is not included for 2 reasons. First 3.12 is actually related to Over/under recoveries from traffic variations from previous years to be carried-over (therefore not from activities related 2015). Additionally all items under item 3 are related to traffic risk sharing adjustment. As you well mention that is why we have to include item 3 in the "traffic risk sharing adjustment" but only the amounts related to 2015 activity i.e. item 3.10 and item 3.11.</p> <p>For the "traffic adjustment" we have to use only item 4.1 because if you use 4.8, as you suggest in your calculation, then again you are counting carry overs from previous years included in items 4.2 and 4.2 and therefore not incurred in 2015.</p> |
| 20 | SWITZERLAND FABEC Monitoring of terminal Cost-efficiency 2015 page 451 box 10 | COST-EFFICIENCY | factual | <p>Estimated proportion of financing through debt (in %) actual 2015 used in this table is not in line with the % we provided in the additional information in June 2016 on page 2/13. In 2015 % of debt is 36.1%. Please update the % of debt and equity accordingly.</p> | <p>Thanks for your comment. The % of debt and equity provided in the report is calculated based on the standard guides. We take note of your of your comment and as agreed by phone, finally no changed is required since it has not significant impact.</p> |
| 21 | SWITZERLAND FABEC Monitoring of gate-to-gate Cost-efficiency 2015 page 453 box 3 | COST-EFFICIENCY | General | <p>We aligned the En-route Reporting Tables with the NSA costs exempt report.</p> | <p>Thanks for your comment this is Noted.</p> |

27.RP2 Fact Validation - Comment Registry NEFAB

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|--------------|---|------------------|--|--|--|
| 1 | PRB Annual Monitoring Report 2015 and Monitoring of Environment page 458 , the Horizontal Flight Efficiency in 2015A at NEFAB level, table KEA | environment | Factual mistake? | In the NEFAB – RP2 Monitoring Report 2015 (270616) the KEA for 2015A was prefilled equal to 1,44 (not 1,40) at NEFAB level | Thank you for your comment. The PRB is constantly reviewing the accuracy of the indicators and reacting to queries or anomalies highlighted by stakeholders. One such anomaly was due to switch over between SSR codes and resulted in double trajectories with variation in KEA. The data was recalculated, with the approval of the European Commission and the corrected figure was updated on the performance dashboard. |

28.RP2 Fact Validation - Comment Registry Estonia

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|--------------|---|------------------|--|---------|----------|
| | | | | | |

29.RP2 Fact Validation - Comment Registry Finland

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|--------------|---|------------------|--|---------|----------|
| | | | | | |

30.RP2 Fact Validation - Comment Registry Latvia

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|--|---|---|
| 1 | <p>Page 503.</p> <p>PRB Observations on Effective booking procedures.</p> <p>No details were provided on which segregated or restricted areas were considered for the calculation of effective booking procedures. Therefore it is impossible to gauge whether or not this information is based exclusively on those areas which impact either available ATC capacity or available route options.</p> | capacity | Factual mistake | <p>The CAA of Latvia provided SUA data on January 22, 2016. E-mail sent to Mr. Ferro Antonio contained list of SUA references – TSA and TRA designation, which indicated what segregated or restricted areas were considered for the effectiveness of use calculation. The e-mail of January 22, 2016 can be re-sent to PRU for evidence.</p> | <p>Thank you for your comment. The PRB is happy to update the document accordingly.</p> |

31.RP2 Fact Validation - Comment Registry Norway

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team Impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response | | | | | | | | | | | | | | | | | | | | | | | | | |
|--------------|---|-----------------|--|---|---|--------|------------------------------|--|--------------|--------------------------------|--|--------------|-------|-------|-------|-------|--------------|-----------|-----------|--------|-----------|-----------|--------|--------|-------------|-------------|-------|-------------|-------------|-------|
| 1 | PRB Annual Monitoring Report 2015 and Monitoring of en-route cost-efficiency page 522 , 3.Focus on en-route at State/Charging Zone level and En-route costs, the first paragraph | cost-efficiency | Factual mistake? | <p>MET provider cost is not lower (-11,6%), but higher than planned in 2015 (+53,1%) nom.</p> <p>The actual cost for Avinor (ANSP) is -4,9 % (nom.) lower than planned (not -4,3%) in 2015.</p> | <p>Thank you for your comment.</p> <p>The difference between 2015 actual and planned costs for MET provider (-11.6%) and Avinor (-4.3%), both in nominal and real terms, results from the data disclosed by Norway in the June 2016 en-route reporting tables, as shown in the table below:</p> <table border="1"> <thead> <tr> <th rowspan="2">Entity</th> <th colspan="2">En-route costs (nominal NOK)</th> <th rowspan="2">Diff. (in %)</th> <th colspan="2">En-route costs (real NOK 2009)</th> <th rowspan="2">Diff. (in %)</th> </tr> <tr> <th>2015D</th> <th>2015A</th> <th>2015D</th> <th>2015A</th> </tr> </thead> <tbody> <tr> <td>MET provider</td> <td>8 511 488</td> <td>7 524 358</td> <td>-11.6%</td> <td>7 769 639</td> <td>6 868 466</td> <td>-11.6%</td> </tr> <tr> <td>Avinor</td> <td>918 338 356</td> <td>878 981 043</td> <td>-4.3%</td> <td>838 297 231</td> <td>802 360 986</td> <td>-4.3%</td> </tr> </tbody> </table> | Entity | En-route costs (nominal NOK) | | Diff. (in %) | En-route costs (real NOK 2009) | | Diff. (in %) | 2015D | 2015A | 2015D | 2015A | MET provider | 8 511 488 | 7 524 358 | -11.6% | 7 769 639 | 6 868 466 | -11.6% | Avinor | 918 338 356 | 878 981 043 | -4.3% | 838 297 231 | 802 360 986 | -4.3% |
| Entity | En-route costs (nominal NOK) | | Diff. (in %) | En-route costs (real NOK 2009) | | | Diff. (in %) | | | | | | | | | | | | | | | | | | | | | | | |
| | 2015D | 2015A | | 2015D | 2015A | | | | | | | | | | | | | | | | | | | | | | | | | |
| MET provider | 8 511 488 | 7 524 358 | -11.6% | 7 769 639 | 6 868 466 | -11.6% | | | | | | | | | | | | | | | | | | | | | | | | |
| Avinor | 918 338 356 | 878 981 043 | -4.3% | 838 297 231 | 802 360 986 | -4.3% | | | | | | | | | | | | | | | | | | | | | | | | |

32.RP2 Fact Validation - Comment Registry SW – FAB

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|------------------|--|---|---|
| 1 | Volume 2 - Local Overview SW FAB SW FAB assessment of capacity performance 3 rd paragraph Page 536 | environment | Factual | See comment as # 8.- As a result of the Post Operational Performance Adjustment Process, the Network Manager agreed to deduct a certain amount of minutes of delay for Spain. The final result for this key performance indicator should quantitatively reflect this deduction. | Thank you for your comment. The Network Manager has not yet provided the PRB with a list of changes to delays. If they are provided prior to publication they will be referenced. |
| 2 | Volume 2 - Local Overview SW FAB Compliance issues related to FAB incentive scheme Page 540 | environment | General concept | The SW FAB Performance Plan – RP2 SOWEPP 2.0 has been adopted, and backed up the Commission Decision regarding the consistency of FAB Performance Plans for RP2. The Annual monitoring report is not the context to deal with issues that are part of the planning process. Besides, 0.54 minutes of delay has been the threshold for penalties on ANSPs since the first version of the SW FAB Performance Plan – RP2 SOWEPP 1.0 (June 2014). The incentive mechanism, as part of the SOWEPP was subject to a consultation process in the context set by Regulation (UE) 390/2013. The incentive mechanism was not subject to concerns raised by the airspace users in this element in particular, and as already said, the mechanism has not changed in the threshold for penalties on the ANSPs. Consequently the appreciations included in this section (and some other throughout the document using the same arguments) are not considered valid and should be removed. | Thank you for your comment, which has been noted by the PRB. The PRB insists on addressing compliance issues in the monitoring exercise. |
| 3 | Volume 2 - Local Overview SW FAB Compliance issues related to FAB incentive scheme 2 nd paragraph Page 540 | environment | Factual | The following comment should be removed: <i>“SW FAB have provided the PRB with an updated revised performance plan, also named v2.0 but dated May 2016. {The updated plan was provided to the PRB in July 2016}.”</i> RP2 SOWEPP 2.0 was adopted by the Member States within the SW FAB and made available to the Commission. It was not the responsibility of the Member States to deliver it directly to the PRB as well. | Thank you for your comment which has been noted by the PRB. |
| 4 | Volume 2 - Local Overview SW FAB Result of FAB Capacity | environment | Concept | Same comment as # 2. In particular, the following statement should be removed: <i>“The PRB suggests that stakeholders would appreciate greater</i> | Thank you for your comment which has been noted by the PRB, and will be forwarded to the incentive study of the European Commission. |

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| | Incentive Scheme Page 540 | | | <i>justification of the en-route incentive scheme applied for SW-FAB and in particular the justification for selecting such a wide and non-symmetrical deadband."</i> | |
|--|------------------------------|--|--|---|--|

33.RP2 Fact Validation - Comment Registry Portugal

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|---------------|--|---|--|
| 1 | Volume 2 - Local Overview PORTUGAL En route Capacity incentive Scheme Pg. 568 (Table) | ??? | Mistake | Portugal's contribution to the SW FAB capacity target in the RP2 SOWEPP is 0.19 in 2015, but 0.15 in 2016, 0.14 in 2017 and 2018, and 0.13 in 2019. | Thank you for your comment, which has been noted by the PRB. The PRB is happy to update the document according to the SOWEPP 2.0 May 2016 version. |

34.RP2 Fact Validation - Comment Registry Spain

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|-----------------|--|--|--|
| 1 | Volume 2 - Local Overview SPAIN En route Capacity incentive Scheme Pg. 568 (Table) | capacity | Mistake | Spain's contribution to the SW FAB capacity target in the RP2 SOWEPP (version 2.0) has been set at the following annual values: 0.30 in 2015, 0.29 in 2016, 0.28 in 2017 and 0.27 in 2018 and 2019. | Thank you for your comment, which has been noted by the PRB. The PRB is happy to update the document according to the SOWEPP 2.0 May 2016 version. |
| 2 | Volume 2 - Local Overview SPAIN National Capacity incentive Scheme Page 568 | capacity | Factual | With respect to the sentence "...but this issue has not been addressed to date." The revision of the RP2 SOWEPP was motivated by the COMMISSION IMPLEMENTING DECISION (EU) 2015/347 of 2 March 2015, concerning the inconsistency of certain targets included in the functional airspace block plan submitted. The updated Performance Plan sent to the Commission includes the national contribution for Spain and Portugal, consistent with the SW FAB target endorsed by the Commission Decision (UE) 2016/599 of 15 April 2016. The proposal accepted by the Commission did not include figures for Spain or Portugal for 2015, just FAB targets. | Thank you for your comments. It is correct that the FAB targets are consistent; however, the individual national targets for each year remain inconsistent with the adopted FAB targets. |
| 3 | Volume 2 - Local Overview SPAIN PRB observations regarding national capacity performance Pg. 568 | capacity | Factual | As a result of the Post Operational Performance Adjustment Process, the Network Manager agreed to deduct a certain amount of minutes of delay for Spain. The final result for this key performance indicator should quantitatively reflect this deduction. | Thank you for your comment. The Network Manager has not yet provided the PRB with a list of changes to delays. If they are provided prior to publication they will be referenced. |
| 4 | Volume 2 - Local Overview SPAIN Overall | | General | The classification of PIs by Key Performance Area should be revised to be aligned with the classification contained in the regulation (EU) 390/2013 (e.g. FUA and CDRs). | Thank you for your comment, it has been noted by the PRB. |
| 5 | Volume 2 - Local Overview SPAIN Overall 5. En-route costs monitoring (2015 actuals compared to PP) Page 573 | cost-efficiency | Mistake? | The figure does not match the column graph for VFR exempted flights. | Thank you for your comment. As explained in Reader's Guide (see section 2, box 5. "En-route (or terminal) costs monitoring (2015 actuals compared to PP)" on p.3), the bar relating to VFR exempted flights follows the inverse logic, since it represents a deduction from the total costs. In the case of Spain Continental (see p.573), the actual 2015 costs for VFR exempted flights are -10.4% lower than planned, which involves a lower deduction and consequently an increase of the actual total costs (by +0.2 M€2009) compared to the plan. |

35.RP2 Fact Validation - Comment Registry UK – IRL

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|--|---------------|--|--|--|
| 1 | Page 586, (UK-Ireland FAB) Monitoring of ENVIRONMENT for 2015 | General | ENVIRONMENT | The FAB achieved actual performance is 3.47%, but no distinction at State level is visible in the report. Ireland has consistently delivered one of the lowest European annual HFE of 1.3% during RP1 and RP2. Full Free Route Airspace has been in place in Ireland since 2009 and as such there is no inefficiency in Irish airspace. For completeness, it would be preferable if this distinction was noted in the report. | Thank you for your comment. HFE performance is measured at FAB level, and for that values are not reported at State level. While Ireland, thanks to the implementation of FRA, is one of the best performing States, there are still residual inefficiencies due to the interfaces. |
| 2 | Page 587, Monitoring of Airports Contribution to ENVIRONMENT, part 1 | General | Airports Contribution to ENVIRONMENT | As noted in the UK-Ireland 2015 monitoring report (page 25), the UK's performance is still an improvement on the previous years' performance although it did not improve enough to meet the 2015 target. We consider that this demonstrates that the UK's performance is still 'contributing to' EU targets, and it will likely continue to improve in coming years. The CAA will engage with the PRU and Network Manager to understand the causes of underperformance last year and will actively monitor performance in 2016 with a view to understand whether 2015 was an anomaly (given improving performance in previous years) or the start of a trend. Where appropriate, once the causes of underperformance are known and understood, the CAA will engage with NERL with a view to agreeing corrective measures going forward. | Thank you for your comment, which is noted. The PRU looks forward to working with you to understand the causes. |
| 3 | Page 587, Monitoring of Airports Contribution to ENVIRONMENT, part 2 | General | Airports Contribution to ENVIRONMENT | UK CAA We consider that the report should note that Taxi Out Time can be affected by a number of factors, some which are not in the direct control of the ANSP. Where airport operators have capacity/utilisation performance objectives, they may require their ANSPs to prioritise these over reduced other operational measures such as Taxi Out Time. We also note the relatively complex nature and scale of operations of Heathrow and Gatwick which may also impact on Taxi Out Time. IAA Concerns around TXOT are primarily attributable to | Thank you for your comments. The PRB realizes the need to identify more influencing factors for the PIs related to airports and is working in that direction. Your input is noted and it will be taken into account for future research. |

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| | | | | <p>significant deficiencies with the aerodrome infrastructure at Dublin airport. The infrastructure deficiencies at Dublin airport are two-fold:</p> <p><u>Infrastructure Design:</u> The Dublin Airport aerodrome manoeuvring area is populated with several bottlenecks which restrict the service provider’s ability to deal efficiently with departure peaks. In order to safely operate this infrastructure, it is necessary for the airport operator (Dublin Airport Authority) to apply several airport restrictions on entry and exit to taxiways and the runway. These restrictions which are outside the control of the IAA ANSP significantly contribute to taxi-out times and delays. These restrictions can be seen on the AIP for Dublin airport which is available on the IAA’s website (http://iaip.iaa.ie/iaip/IAIP_Frame_CD.htm)</p> <p><u>Infrastructure Investment:</u> Levels of investment in runway and taxiway infrastructure at Dublin airport has not kept pace with traffic growth in recent years. In particular, the lack of a second runway and the lack of rapid exit taxiways on the existing runway (noting the importance of preventing runway incursions) may contribute to the additional taxi-out times.</p> <p>Dublin Airport remains a single runway airport and accordingly the comparison within the group of airports with a traffic share of more than 37500 and less than 225000 airports (Pg. 596) is not a valid or useful comparison. The concept of comparing airport averages across Europe for Additional Taxi-Out Time simply based on traffic levels does not give an appropriate comparative analysis, as it does not consider the efficiency of the aerodrome infrastructure. For example, the average used by the PRB in its analysis compares single runway operation airports such as Dublin, with parallel runway operations at other airports. These parallel runway operations are inherently more efficient and can handle more traffic with less delays. It would be more useful and more appropriate to compare Additional Taxi Out Time at Dublin with other single runway operation airports, handling a similar level of traffic.</p> | |
| 4 | Page 587, Monitoring of Airports Contribution to ENVIRONMENT, part 3 | General | Airports Contribution to ENVIRONMENT | <p>The report notes that London Heathrow and London Gatwick accrue a significant high level of additional time in the terminal airspace, and this influences the average FAB performance significantly. We note that this PI is not</p> | <p>Thank you for your comment. The reference to the “FAB average performance” will be removed from the document.</p> |

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| | | | | measured or reported on at FAB level, and as such it does not seem appropriate to draw this conclusion in the report. | |
| 5 | Page 590, 'PRB observations on the Military dimension of the plan' | General | CAPACITY | <p>UK The UK's 2015 military activities aligned with those noted in the monitoring report (page 68), which are carried out as business as usual. This includes the work of the Joint Air Navigation Services Council that ensures services are delivered on a joint and integrated basis, and military controllers at Swansick which provide ATS utilising NERL data and facilities. We are happy to provide a more detailed explanation of 2015 activities if required.</p> <p>Ireland The National Airspace Policy Body (NAPB), which is a group consisting of State, NSA and Military personnel, reviews the effectiveness of FUA annually.</p> | Thank you for your comment. In the template for performance plans (Annex 2 of 390/2013) the Military dimension of the plan requires a description of how the application of FUA will provide additional capacity. Although the UK and Ireland have provided details of their close civil military coordination activities, no details have been provided about how these activities have provided additional capacity. Therefore the report will remain as published. |
| 6 | Page 591, 'PRB observations on the application of FUA' | General | CAPACITY | The UK undertakes a monthly review, where we assess the performance and continually examine whether the airspace usage is optimal, and question why if it does not appear to be working. This is overseen by our Airspace Management Steering Group which is chaired by the CAA and has representation from air navigation service providers, the Ministry of Defence, flight plan service providers and the UK Airspace Management Cell. | Thank you for your comment. The PRB welcomes the regular review of the application of FUA by the UK authorities. Unfortunately, none of the information resulting from the review was included in the UK IRL monitoring report and therefore cannot be assessed by the PRB. Perhaps it could be included in future reports? |
| 7 | Page 592, Monitoring of Airports Contribution to CAPACITY, Part 2 | General | Airports Contribution to CAPACITY | In regards to ATFM arrival delay, we note that Ireland met and exceeded the PP values for the year. We are also not certain where the 0.84 figure comes from, and note that the PI is not required to be measured or reported at FAB level. | Thank you for your comment. The fact that Ireland meets the national target is noted in the corresponding section at National level. The 0.84 is the average Arrival ATFM Delay for all airports in the FAB that are listed in the RP2 Monitoring. Your comment is noted, the PRB understands this PI is not measured at FAB level against any target. However it considers there is value in observing the FAB average. |
| 8 | Page 592, Monitoring of Airports Contribution to CAPACITY, Part 2 | General | Airports Contribution to CAPACITY | The draft report notes that 'The UK-Ireland FAB performance plan presents no incentive scheme for the national target on arrival ATFM delay'. It should be noted here that there is no requirement under RP2/SES rules for such an incentive scheme. See also comment 23 below. | Thank you for your comment. A reference to the Performance Plan, where reasons are fully explained, will be added to the text. |

36.RP2 Fact Validation - Comment Registry Ireland

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
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| 1 | Page 601. (2) En route DUC monitoring at charging zone level & (3) Focus on en-route at state / charging zone level Page 605 (2) Terminal DUC monitoring at Charging Zone level | cost-efficiency | | Can you please provide us with a detailed calculation of the cost of capital adjustment referred to in note 1, as this is required to confirm these figures, and to confirm difference between actual V planned? Similarly, an analysis of the Note 1 adjustment will help us to reconcile 2015 actual terminal costs nominal of €22,332k as per PRB with €21,350 included in terminal table. | Reconciliation table provided by e-mail on 20/9/2016. Teleconference 22/9/2016 and exchange of e-mails until 26/9/2016 concluding that the values shown in the monitoring report are OK, but, Note 1 should be developed to quote the cost of capital before and after adjustment. Note 1 updated accordingly. |
| 2 | Page 602. (8) En-route DUC 2015 vs 2015 Actual Unit cost Page 605 (3) Focus on terminal at State/Charging Zone level | cost-efficiency | | Can you please provide us with a reconciliation for how the Actual unit cost €28.74 quoted on Page 602. (8) En-route DUC 2015 vs 2015 Actual Unit cost relates back to €24.41 in Irish ER tables. Similarly, on Page 605 (3) Focus on terminal at State/Charging Zone level how can we reconcile the Actual (real) terminal unit cost: €145.69 per PRB with the €139.29 per Irish TANS tables. | Reconciliation table provided by e-mail on 20/9/2016. |
| 3 | Page 606 (7) Terminal DUC 2015 vs. 2015 Unit Rate charged to users | cost-efficiency | | Page 606 (7) Terminal DUC 2015 vs. 2015 Unit Rate charged to users CUR €174.84 – Can you please provide us with a breakdown of how this figure was calculated? DUC: €171.90 per PRB. How do we reconcile this to €165.73 per Irish tables (2009 prices)? | Reconciliation table provided by e-mail on 20/9/2016. |
| 4 | Page 606 (8) Terminal DUC 2015 vs. 2015 Actual Unit Cost for users | cost-efficiency | | Actual unit cost incurred by airspace users: €164.46 per PRB. Can you please provide us with a breakdown of how this figure was calculated? | Reconciliation table provided by e-mail on 20/9/2016. |
| 5 | Pg 607 (table 10): | cost-efficiency | | Can you please provide a detailed calculation of terminal surplus? Also, do the figures included reflect the fact that the IAA priced below the price cap in 2015 (IAA €156.92 V price cap of €174.84)? | Reconciliation table provided by e-mail on 20/9/2016. The fact that IAA priced below the price cap in 2015 was not mentioned in the additional information provided with the terminal Reporting Tables and we were not aware of the situation. Three main changes to the 2015 Monitoring Report have been implemented to reflect this situation (in agreement with IAA following teleconference 22/9/2016): - Box 7 (terminal): use of “other revenues” so that |

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| | | | | | <p>the calculated CUR matches with the price actually charged by IAA in 2015;</p> <ul style="list-style-type: none"> - Box 8 (terminal): use of “other revenues” in line with box 7 to adjust the true cost for airspace users; - Box 12 (terminal): no change to the data, but, comment added at the end of the analysis to explain the situation and provide an estimation of the actual surplus when taking into account that IAA priced below the price cap in 2015. |
| 6 | Pg 603: En Route ATSP RoE | cost-efficiency | | <p>the current RoE as calculated by PRB is 32.5%. This looks like a high number and is mainly due to the IAA keeping its asset base low and working its low asset base hard. Will this fact be taken into account by the PRB when comparing this RoE with the RoE of other ANSPs with higher asset bases? This may be something we will include as a comment to explain why the Irish RoE looks high.</p> | <p>Comment inserted in Box 12 (en-route) to mention that IAA asset base (expressed in € per TSU) is the fourth lowest among SES States.</p> |
| 7 | Page 598, (Ireland) Monitoring of CAPACITY for 2015. PRB observations regarding national capacity performance. | | General | <p>Based on the PRB comments, the Irish NSA feels it is necessary to emphasise the effectiveness and appropriateness of the Incentive scheme as it currently stands.</p> <p>It should be noted that stakeholders and the PRB were presented with detailed descriptions and justifications of the en-route capacity incentive scheme during the consultation phase of RP2 in 2014, and in the supporting documentation provided with the submitted UK-Ireland Performance Plan. In the specific context of the Irish element of the incentive scheme, the NSA can confirm the following;</p> <ul style="list-style-type: none"> • The Incentive scheme had to, by definition, be tailored to the target value. It would be unrealistic to do otherwise. • At the time the Performance Plan was being prepared, the NSA considered all available historical data for delays over an extended timeframe in the context of the traffic profile prevailing. (increasing vs. decreasing, contributing factors, infrastructural evolution, etc.). It is an over simplification to always assume historical trends will continue in perpetuity. • The design of the scheme quite specifically uses a “dead band” mechanism that requires significantly | <p>Thank you for your comments. The PRB and the Commission are currently reviewing the introduction of incentive schemes across the SES area and your input will be useful to the discussion.</p> |

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| | | | | <p>greater performance on the “good” side to trigger a bonus, than on the “bad” side to trigger a penalty.</p> <ul style="list-style-type: none"> It should also be noted that since since 2011, the IAA has handled a significant increase in traffic volumes (in particular in recent years) with increased levels of safety whilst maintaining a low cost base and delivering low ATM delays and considerable investment in contingency provisions. In addition to this, key initiatives such as Free Routing to deliver the most flight efficient airspace in Europe have been delivered. This incentive scheme is an important factor in maintaining this situation. As RP2 carries on, the data we gather will be used in the development and evolution of this and other incentive schemes for RP3. | |
| 8 | Page 592, (UK Ireland FAB) 3. Arrival ATFM Delay – National Target and Incentive Scheme | Airports Contribution to CAPACITY | General | It should be noted here that there is no requirement under RP2/SES rules for such an incentive scheme. | Thank you for your comment. A reference to the Performance Plan, where reasons are fully explained, will be added to the text. |
| 9 | Page 596, (Ireland) Monitoring of Airports contribution to ENVIRONMENT for 2015. Overview | Airports Contribution to ENVIRONMENT | General | The UK Ireland Performance Plan states that Cork and Shannon Airports are only included for the purposes of Terminal Cost Efficiency Targets and not for any other KPI. Therefore, neither Cork nor Shannon Airports are within the scope of the Performance Regulation for the ASMA KPI. | Thank you for your comment which is noted by the PRB. |
| 10 | Page 587, (UK-Ireland FAB) Monitoring of Airports contribution to ENVIRONMENT for 2015. Page 596, (Ireland) Monitoring of Airports contribution to ENVIRONMENT for 2015. Additional ASMA time | Airports Contribution to ENVIRONMENT | General | Arrival congestion at Dublin Airport is a result of a number of factors, such as, the airport operating at or close to capacity for long periods of the day, airport infrastructure deficiencies, weather related factors and possibly to the use of lateral holding procedures (Point Merge) as opposed to the traditional vertical holding pattern. Lateral holding has shown considerable benefits to the Airspace Users in reduced fuel consumption and to the environment in lowering Co2 emissions around terminal areas. It is also our view that the effectiveness, independence and validity of these indicators should be reviewed as part of RP3. | Thank you for your comment, which is noted and will be taken into account in further research concerning the PIs/KPIs. |
| 11 | Page 600, (Ireland) 3. Arrival ATFM Delay – National Target and Incentive Scheme | Airports Contribution to CAPACITY | General | It should be noted here that there is no requirement under RP2/SES rules for such an incentive scheme. | Thank you for your comment. A reference to the Performance Plan, where reasons are fully explained, will be added to the text. |
| 12 | Page 604 (Ireland) 12. Focus on En-Route ATSP: General Conclusions | COST EFFICIENCY | General | The NSA is entirely satisfied that the bonus based on the capacity target incentive mechanism is correctly calculated. The bonus is calculated based on En-Route Income collected by the ANSP for the year, in the form of Eurocontrol monthly billing. The intention of the NSA when formulating | Noted. No change required. As stated in the monitoring report <i>“The inclusion of this bonus in the chargeable cost base will be examined by the EC as part of the compliance review of the 2017 unit rates”</i> . |

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| | | | | <p>this scheme was always to apply the Incentive scheme to total Irish En-route Income. This is referred to as ANSP income because all En-Route income is remitted by Eurocontrol to the ANSP. In this way, there is no difference between State revenues and ANSP revenues. This is consistent with our intentions when drafting the Performance Plan.</p> | |
| 13 | <p>Page 601-609 (Ireland). Monitoring of Cost Efficiency, En-Route, Terminal, Gate to Gate</p> | <p>COST EFFICIENCY</p> | <p>General</p> | <p>The Irish NSA has some concerns with how the PRB monitoring report has changed the 2015 actuals reported by the NSA to alter the assumption of 50% debt financing as contained in the PP to 100%. This has had a consequent change on the cost of capital and total actual costs quoted by the PRB throughout the document.</p> <p>We are of the view that it is appropriate to use 50% gearing ratio for the cost of capital. The PP was based on an assumed 50% debt financing and accordingly all monitoring should be on the same basis as the PP. Theoretically, the gearing ratio to be used when calculating the cost of capital should not be based on the actual company gearing (as it changes from year to year, depending on investments, borrowing, depreciation etc) but rather on a notional gearing ratio that would be chosen by an efficiently financed business, that aims to maintain a solid investment grade rating.</p> <p>In the current market, where the cost of debt is low, the theoretical efficiently financed business is likely to have a higher proportion of debt financing. Accordingly modifying the IAA's cost of capital for 2015 to reflect the IAA's actual gearing only distorts the figures when compared to the cost of capital that the IAA would have obtained if it were financing an investment in 2015. In other words, it is reasonable to assume that debt and equity markets would assume notional gearing of between 50 and 65% and would have priced the cost of capital for IAA accordingly.</p> <p>Given this, the cost of capital for the IAA for 2015 should continue to be based on the assumption of 50% debt financing. In addition, the NSA does not believe it is appropriate to modify the cost of capital ex-post year on year. Cost of capital is typically set for a number of years (4 – 5) and takes account of market projections, risk profile and investments to be made over that period. To modify the cost of capital on an annual basis only serves to increase</p> | <p>Noted. This was addressed as part of comment #1.</p> |

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| | | | | <p>uncertainty for the business, which increases its risk profile.</p> <p>The Irish NSA welcomed the opportunity to discuss this issue with the PRU, and we were provided with clear and detailed explanations as to the calculation and reasons for the adjustments. We acknowledge that the adjustment is consistent with the corrections implemented for other States/ANSPs which are in a similar situation.</p> <p>Notwithstanding the comments above, the Irish NSA is pleased to see the inclusion of explanatory notes outlining the impact of the adjustment, and reconciliation with the submitted Irish cost tables.</p> | |
| 14 | Page 601-609 (Ireland). Monitoring of Cost Efficiency, En-Route, Terminal, Gate to Gate. | COST EFFICIENCY | General | <p>The draft PRB monitoring report makes several references to the ROE (return on Equity) metric. The Irish NSA has had a long held belief that this metric fails to adequately account for the very different assets bases of the regulated entities in each State/FAB. We acknowledge that it is consistently applied, and in alignment with the Charging Scheme Regulation. We welcomed the opportunity to discuss this issue with the PRU, and are pleased to note the proposed inclusion of new text outlining this caveat.</p> | Noted. This was addressed as part of comment #6. |
| 15 | Page 607, 608 (Ireland), Monitoring of terminal COST EFFICIENCY for 2015. | COST EFFICIENCY | General | <p>The Irish NSA has taken the opportunity to discuss with the PRU the fact that the IAA priced below the price cap in 2015 for TANS (IAA €156.92 V price cap of €174.84. In 2015 Ireland <u>chose</u> to charge a price lower than the CUR that would have applied from strict application of the Charging Scheme (instead using the lower price determined by the Commission for Aviation Regulation, which in Ireland has been superseded by the SES RP2). Our understanding is that this is now to be reflected in the monitoring document.</p> | Noted. This was addressed as part of comment #5. |

37.RP2 Fact Validation - Comment Registry United Kingdom

| # Comment | Chapter/Section/ Para/bullet/etc in the document | Team impacted | Type of comment (typo, factual mistake, general, etc.) | Comment | Response |
|-----------|---|--------------------------------------|--|---|---|
| 1 | Page 614, (United Kingdom) Monitoring of Airports Contribution to ENVIRONMENT, part 2 | Airports Contribution to ENVIRONMENT | General | As noted in our annual report, Taxi Out Time can be affected by a number of factors, some which are not in the direct control of the ANSP. Where airport operators have capacity/utilisation performance objectives, they may require their ANSPs to prioritise these over reduced other operational measures such as taxi out time. We feel this should be reflected in the report. | Thank you for your comments. The PRB realizes the need to identify more influencing factors for the PIs related to airports and is working in that direction. Your input is noted and it will be taken into account for future research. |
| 2 | Page 615, (United Kingdom) Monitoring of Airports Contribution to ENVIRONMENT | Airports Contribution to ENVIRONMENT | General | We question the basis of the comment that <i>'the close proximity of both airports certainly affects the performance at Gatwick'</i> – on what basis can this statement be made? | Thank you for your comment. The original motivation behind this comment is seen in the trend over the last years. Additional ASMA time at Gatwick ranged consistently around 3 min / arrival. The last two years (i.e. 2014 and 2015) were characterized by a traffic increase of 3% (2013-2014) and 3.8% (2014-2015). PRB took note of the terminal airspace and procedure work at London throughout the last years to address the challenges of the London multi-airport system. The significant increase in additional ASMA time (~ 1 min / arrival) at Gatwick in 2015 is considered to be partly linked with the general management of the arrival flows into the London airports. The statement "The close proximity of both airports certainly affects the performance at Gatwick." has been removed to avoid any misinterpretation. |
| 3 | Page 616, (United Kingdom) Monitoring of CAPACITY, 'PRB observations regarding national capacity performance' | CAPACITY | General | The C2 incentive scheme is a joint UK-Ireland scheme and as such should not be contained in the UK-only section of the report. We request further clarification of the reference to the capacity performance in Ireland – can the PRB explain more fully the comparison being made? Regarding the comment that <i>'the UK... would have received bonuses for capacity performance in 6 out of the last 8 years'</i> , this does not seem relevant to what is intended to be a report on 2015 performance. Regarding the comment that <i>'the PRB suggests that stakeholders would appreciate greater justification of the en route incentive scheme and the local targets'</i> , we note that | Thank you for your comments. The C2 incentive scheme is also referenced in the Ireland section of the report, not just the UK section. The PRB considers it pertinent to review the incentive schemes applied throughout the SES performance scheme and is making similar comments for other States/ FABs. The Commission decision related solely to the targets for safety, capacity, cost-efficiency and environment. It did not refer to incentive schemes. |

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| | | | | <p>stakeholders were consulted on both the incentive scheme and targets as part of the performance plan preparation process. There is also a detailed explanation of the capacity incentives in Appendix C of the UK-Ireland Performance Plan Supplementary Document.</p> <p>The UK-Ireland plan, including the capacity incentive scheme, was also accepted by the Commission so it is not clear the basis for making these comments in what is meant to be a report on 2015 performance.</p> | |
| 4 | Page 618, (United Kingdom) Monitoring of Airports Contribution to CAPACITY | Airports Contribution to CAPACITY | General | We note that Heathrow's arrival ATFM delay performance in 2015 (2.12 min/arr) is actually less than the performance plan value (2.32 min/arr). | Thank you for your comment. The reference to the local targets is noted for Heathrow and Gatwick. |
| 5 | Page 618, (United Kingdom) Monitoring of Airports Contribution to CAPACITY | Airports Contribution to CAPACITY | General | In relation to the PRB's comment that 'the UK-Ireland FAB performance plan presents no (capacity) incentive scheme for the national target on arrival ATFM delay for the UK', as noted above in comment 8 there is no requirement for this. Also, section 8.43 of our performance plan supplementary document sets out our reasoning for not having these incentives (including due to existing contractual arrangements and our interpretation of Article 15 that it doesn't apply to TANS services), and we would appreciate if these reasons are reflected in the PRB's assessment. | Thank you for your comment. A reference to the Performance Plan, where reasons are fully explained, will be added to the text. |
| 6 | Page 628, (United Kingdom) Monitoring of gate-to-gate cost efficiency | cost efficiency | General | While we can see the interest in gate-to-gate costs, as they are not a feature of the performance plan and as such we question the value of raising them in the annual monitoring report. | Noted. The gate-to-gate analysis is just done for informative purpose. |