



Performance Review Body
designated by
the European Commission



PRB Annual monitoring report 2013

Registry of comments received during fact validation

Edition date: 06.10.2014

RP1 PRB Annual Monitoring report 2013 - Registry of comments received during fact validation

Date	Country	Name of organisation or company	Last name	First Name	Job Title	Email address	Title of the Document commented	Version of the doc. commented	Date of issue of the doc. commented	# Comment	Chapter/Section/Para/bullet/etc in the document	Proposal for modification / addition	Rationale	Relevant for	Status	PRB position
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodomir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	PRB annual monitoring report 2013 – Belgium-Luxembourg Volume 2 – Page 105 – Figure under item 2 + page 109 item 12 Monitoring gate-to-gate costs	Comment	It seems not logical to compare 2011 forecast figures excluding the effect of the one-off effect of the implementation of IFRS in MUAC and the Eurocontrol Agency with 2011 actual figures including the IFRS effects. The variation between planned and actual in 2011 (in the graph) should be -4.3% instead of -8.5% when comparing values excluding the effects of IFRS implementation. Detailed figures of 2011 one-off reduction: The actual data of 2011 include an exceptional deduction of -4.180.026 EUR for the MUAC IFRS effect and -1.772.662 EUR for the Agency IFRS effect. This effect should be neutralized in the actual data to make a comparison with the Performance Plan data: actual En-route costs in nominal terms amount to 156.584.274 EUR (150.631.586 + 4.180.026 + 1.772.662) and 148.032.440 EUR in real terms. Same comment with regard to the gate-to-gate actual 2011 cost on page 109.	COST-EFF	CLOSED	Exclusion of the effects of the one-off reduction in EUROCONTROL costs in 2011 would result in a figure which does not reflect the actual costs in 2011. However, Note 2 has been slightly rephrased to indicate the results if the effects were excluded. Finally, these effects do not affect the results of the analysis of the economic surplus with respect to en-route activity in 2013.
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodomir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	PRB annual monitoring report 2013 – Belgium-Luxembourg Volume 2 – Page 106 – table Costs exempted from cost sharing	Comment	In response to the compliance check by Eurocontrol (e-mail from Ms Capart dd. 20/08/2014), we updated our reporting tables and removed the amount of the FAB EC TEN-T subsidy from the "costs claimed for exemption from cost sharing" and included it as "other income". In the last version of our reporting tables, only the difference between planned and actual Eurocontrol Agency costs is reported as "costs claimed for exemption from cost sharing": -1461('000€) in 2013 or -1330('000) in 2009€	COST-EFF	CLOSED	Table in Item 4 "Costs exempted from cost sharing" reflects for all States the data as submitted by NSA in their annual reports on costs exempt from risk sharing. Nevertheless, "the costs exempt from cost sharing" reported for Belgocontrol, which are related to the FAB EC TEN-T subsidy have not been considered in the analysis of the economic surplus/loss with respect of the en-route activity in 2013, as indicated in Note 3 on page 107.
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodomir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	PRB annual monitoring report 2013 – Belgium-Luxembourg Volume 2 – Page 106 – item 6 ATSP estimated surplus + item 7 general conclusion on estimated surplus	Comment	We would like to comment on the methodology for calculating the gain/loss on the En route activity: - It is not correct to consider the cost and traffic risk of 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.	COST-EFF	CLOSED	Risk sharing arrangements have direct implications on the SES ATSP profitability (economic surplus and ex-post RoE) and financial strength. Therefore, it is necessary to consider the impact of the cost sharing and traffic risk sharing arrangements. As emphasised in the Report, this is the economic analysis which focuses on the ATSP results in respect of the activities performed in 2013. It does not consider the cash flow position and liquidity balance at the end of the year which are impacted by the charging mechanism whereby the eligible under-recoveries (for traffic, etc.) are to be recovered in year N+2 or later.
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodomir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	PRB annual monitoring report 2013 – Belgium-Luxembourg Volume 2 – Page 107 – Actual 2013costs vs NPP with regard to Costs exempted from cost sharing	Comment	Cf. comment 2	COST-EFF	CLOSED	See response to comment 2
26 Sept	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodomir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring	3.0	12/09/2014	5	PRB Annual monitoring	General	The data from the reporting tables are more recent than the data provided in the monitoring plan and	COST-EFF	CLOSED	Noted. This is why Note 1 was already added in the Monitoring

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2014							report 2013 Volume 2				report 2013 Belgium-Luxembourg, volume 2, p.107 (Note 1: Actual en-route costs for 2013)		therefore they provide the most updated information on the actual costs for 2013.			of en-route and terminal Cost-Efficiency for 2013, page 107.
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	PRB annual monitoring report 2013 – Belgium-Luxembourg Volume 2 – Page 108 – item 9 En route DUR vs 2013 actual unit cost	Mistake?	Based on our calculations, we obtain an effect of 0,83€ for the traffic adjustment related to the costs not subject to traffic risk sharing (1.897 K€ / 2.277 service units), while 0,97 is mentioned in the report.	COST-EFF	CLOSED	True cost for users reflects the unit cost that the users incur in respect of the activities performed in 2013 . Therefore, traffic adjustment (for costs not subject to traffic risk sharing) does not take into account the adjustment of the amounts carried-over to 2013, as these do not relate to the activities performed in 2013. The calculation for Belgium is: 2 198 K€ / 2 277 SUs = 0.97 €
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	PRB Annual monitoring report 2013 Belgium-Luxembourg, volume 2, p.102 (recommendations)	Wrong statement and misleading interpretation of EC recommendation	(See also the FABEC comment on this same issue). As written in the 6th paragraph on page 101 where the EC recommendation wording is recorded, the recommendation DOES NOT require Belgium (but also FABEC States) to develop and implement capacity plans that meet the 0.4 reference value in 2014, but at the earliest possible date in RP2. We would like to remind to PRB that this recommendation has been addressed by FABEC authorities in due time (26th June 2013, as required by the recommendation): a letter has been sent to EC (copy to PRB CM) signed by FABEC FPC CM explaining when the 0.4 reference value could be reached in RP2. Since that time, new capacity plans have been required by States in order to reach new RP2 targets for capacity set by FABEC MS in the RP2 FABEC performance plan, under assessment. So, this recommendation has been fully taken into consideration and addressed by FABEC authorities in the most formal way and in the required timeframe: the current PRB statement shall be changed in order to reflect this.	CAP	OPEN	The original recommendation was never rescinded. FABEC States have not implemented the original recommendation, therefore it remains outstanding. A letter from FABEC stating that they will not comply with a recommendation does not nullify the recommendation.
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	13	3.2.2 and 3.2.13	General	Agree to link the surveillance projects to enabler CTS-S9b	CAPEX	CLOSED	General comment accepted: No change in the report
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	14	3.2.2 and 3.2.13	General	The VOR/DME replacement is not really a prerequisite for ESSIP NAV03: it is a replacement project meaning that the VOR/DME infrastructure exists already today	CAPEX	CLOSED	Comment accepted: Delete PRNAV-NAV03 Obj linked in report
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	15	3.2.13	Mistake	A-SMGCS should in this case not be linked to AOP04-1 nor to AOP04-2 as the airports where the systems will be deployed are not part of the "area of applicability" (ESSIP – ANNEX B – List of Airports).	CAPEX	CLOSED	Comment rejected: A-SMGCS project is mentioned for Brussels airport and EBBR is in part of the "area of applicability" (ESSIP - Annex B)
26 Sept 2014	Belgium	BELGIAN CAA	NSENGI MANA	Théod omir	Attache	<Theodimir.Nsengimana@mobililit.fgov.be>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	16	3.2.15	Mistake	See also comment #2. There should not necessarily be a match between the planning of both projects: the PRNAV project is about the development of procedures and the VOR/DME project is a infrastructure replacement project, meaning that the infrastructure is already in place.	CAPEX	CLOSED	Comment accepted: Delete whole par 3.2.16
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	BG 2014-09-12 RP1 Annual Monitoring report 2013 vol. 2 – National overview for fact validation 2013; Effectiveness of Safety Management Bulgaria, page	Factual /general	It is not clear why "ANSP [Budapest Airport]" is included in the report related to Bulgaria. Could you please justify your statement related to the safety scores?	SAF	Partially accepted.	TYPO. Budapest airport should/will be removed from BULGARIA sheet in Volume 2. As regard the State EoSM questionnaire, EASA is providing a summary of verification of State EoSM scores (based either on thorough or light verification).

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											27					In addition, EASA, on a voluntary basis and in order to benefit the authorities, decided to provide feedback to the States as of the third year of the exercise. The goal is to reconcile the self-perception that the States have (scores on the EoSMP KPI) with the external view that EASA gains during the audits.																				
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	BG 2014-09-12 RP1 Annual Monitoring report 2013 vol. 2 – National overview for fact validation 2013; Application of the severity classification of the Risk Analysis Tool (RAT), page 27	Factual mistake	Separation Minima Infringements (SMIs); ATM Overall for 2013 – instead of 0% shall be replaced by 100%.	SAF	Accepted.	AST Team will lease with them again and confirm (or not) by the end of the October and update the dash-board as necessary.																				
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	BG 2014-09-12 RP1 Annual Monitoring report 2013 vol. 2 – National overview for fact validation 2013; Effective booking procedures, page 28	General	The restricted or segregated airspace that is surplus to the requirements and released for GAT use is included on tactical basis in UUPs.	CAP	reject	No information was provided in NSA report about either UUP allocation of airspace or on the allocation of airspace at H-3.																				
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	BG 2014-09-12 RP1 Annual Monitoring report 2013 vol. 2 – page 32	Factual mistake	En-route reporting tables were also amended. The respective amendments are reflected in the figures for 2012A on page 30.	COST-EFF	CLOSED	Noted. This is why a note was already added in the Monitoring of en-route and terminal Cost-Efficiency for 2013, page 32.																				
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	BG 2014-09-12 RP1 Annual Monitoring report 2013 vol. 2 – page 32	Factual mistake/general	<p>The comment that Bulgaria did not pass the traffic forecast check was related to the initially submitted PP for RP1 in June 2011. However, Bulgaria has submitted a revised PP for RP1 in January 2012, where the forecast was revised upwards and Bulgaria has passed this check. Moreover in 2013 the forecast was quite in line with the actual figures.</p> <p>The comment that the traffic in 2014 is well above the forecast is not presented correctly. According to the monthly distribution in BULATSA Annual financial plan for 2014, it is obvious that for each of the three months the actual service units numbers are lower than the forecast.</p> <table border="1"> <thead> <tr> <th>Total service units</th> <th>JAN' 2014</th> <th>FEB' 2014</th> <th>MAR' 2014</th> </tr> </thead> <tbody> <tr> <td>Actual figures</td> <td>128,14</td> <td>119,84</td> <td>143,43</td> </tr> <tr> <td></td> <td>2</td> <td>5</td> <td></td> </tr> <tr> <td>BULATSA Annual financial plan</td> <td>138,45</td> <td>120,05</td> <td>143,51</td> </tr> <tr> <td>Difference (actual vs. plan)</td> <td>-7.45%</td> <td>-0.18%</td> <td>-0.05%</td> </tr> </tbody> </table> <p>The monthly distribution on the EUROCONTROL website is done by EUROCONTROL and shows an increase for each of these three months and is not in line with the view of the Bulgarian ANSP.</p> <p>Further to that it is to be noted that by March 2014 we had only the information that Kosovo airspace will be opened on 03 April 2014 and that on 08 April 2014 the route UP975 via Syria will be closed. There was no clue of the developments in Simferopol FIR</p>	Total service units	JAN' 2014	FEB' 2014	MAR' 2014	Actual figures	128,14	119,84	143,43		2	5		BULATSA Annual financial plan	138,45	120,05	143,51	Difference (actual vs. plan)	-7.45%	-0.18%	-0.05%	COST-EFF	CLOSED	<p>Comment related to traffic forecast check: Noted. According to the PRB assessment of the revised Performance targets for RP1 the forecast TSUs have been increased. It was considered as an improvement, although marginal compared to the STATFOR September 2011 forecasts and the 2011 traffic outturn.</p> <p>Comment related to traffic 2014: We take note of your comment. In the Monitoring of en-route and terminal Cost Efficiency for 2013, was used the latest Forecast available for Service Units (May 2014). The increase in the Service units is related to drastic change generated after the happenings that took place in Ukraine.</p>
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													at that time. Taking this into account, the outcome from these two events could have been rather negative for Bulgaria and would have most likely offset the total positive traffic outcome for 2012 and 2013.																							
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	6	RP1 Annual Monitoring Report 2013 vol. 3 – DANUBE Bulgaria/ page 11/ Table 7.	General	The figures in the Table 7 are presented into 2009 EUR prices. It is difficult for us to validate the data without the additional information used to convert the nominal figures in BGN into real figures in EUR.	CAPEX	CLOSED	The figures in EUR2009 were computed using 2009 Avg exchange rate (BGN:EUR1.9553) and inflation indexes provided in the PP for RP2. Action: no change in the assessment report																				
26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	7	RP1 Annual Monitoring Report 2013 vol. 3 – DANUBE Bulgaria/ page 12 item 3.3.15	General	Weather radar link was updated to enablers METEO -01 and CTE-S7a: <table border="1"> <tr> <td>Name of investment</td> <td>Reference to European ATM MP (ESSIP objectives/ OI Steps Enablers)*</td> </tr> <tr> <td>Weather Radars</td> <td>METEO -01, CTE S7a</td> </tr> </table>	Name of investment	Reference to European ATM MP (ESSIP objectives/ OI Steps Enablers)*	Weather Radars	METEO -01, CTE S7a	CAPEX	CLOSED	Comment accepted. Action: 3.3.15 deleted																
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26 Sept 2014	Bulgaria	Bulgarian CAA	Iliev	Lazar	National coordinator for DANUBE FAB	ILIEV Lazar <lazar.iliev@eurocontrol.int>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	8	RP1 Annual Monitoring Report 2013 vol. 3 – DANUBE Bulgaria/ page 12 item 3.3.16	General	The link between the projects and the ESSIP objectives was updated see updated in the table, as follows: <table border="1"> <tr> <td>Name of investment</td> <td>Reference to European ATM MP (ESSIP objectives/ OI Steps Enablers)*</td> </tr> <tr> <td>New En-route PSR and Mode S SSR</td> <td>LO-8, CM-0801, CTE-S5, ESSIP ITY SPI</td> </tr> <tr> <td>NEW UHF</td> <td>AOM-0804, 0803, CTE-C5</td> </tr> <tr> <td>NEW TMA PSR & MODE S SSR at Sofia Airport</td> <td>LO-8, CM-0801, CTE-S5, ESSIP ITY-SPI</td> </tr> <tr> <td>A-SMGCS</td> <td>L10, AO-0201, ESSIP AOP04.1, AOP04.2</td> </tr> <tr> <td>ADS-B en-route approach WAM</td> <td>AUO-0402, CTE-S5, CTE-S1, ESSIP ITY-SPI</td> </tr> <tr> <td>DME-DME</td> <td>IDP WP6, ESSIP NAV 03, ATM MP OIs AOM-0601</td> </tr> <tr> <td>VOR – DME</td> <td>IDP WP6, ESSIP NAV 03, ATM MP OIs AOM-0601</td> </tr> <tr> <td>National radio microwave network</td> <td>IS-0204, 0702, CTE-C10</td> </tr> <tr> <td>VDL-Mode 2</td> <td>IDP WP 4, ESSIP ITY – AGDL, ATM MP: OIs AUO-0301</td> </tr> </table>	Name of investment	Reference to European ATM MP (ESSIP objectives/ OI Steps Enablers)*	New En-route PSR and Mode S SSR	LO-8, CM-0801, CTE-S5, ESSIP ITY SPI	NEW UHF	AOM-0804, 0803, CTE-C5	NEW TMA PSR & MODE S SSR at Sofia Airport	LO-8, CM-0801, CTE-S5, ESSIP ITY-SPI	A-SMGCS	L10, AO-0201, ESSIP AOP04.1, AOP04.2	ADS-B en-route approach WAM	AUO-0402, CTE-S5, CTE-S1, ESSIP ITY-SPI	DME-DME	IDP WP6, ESSIP NAV 03, ATM MP OIs AOM-0601	VOR – DME	IDP WP6, ESSIP NAV 03, ATM MP OIs AOM-0601	National radio microwave network	IS-0204, 0702, CTE-C10	VDL-Mode 2	IDP WP 4, ESSIP ITY – AGDL, ATM MP: OIs AUO-0301	CAPEX	CLOSED	Comment accepted. Action: text for part 3.3.14-3.3.17 modified.
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VDL-Mode 2	100%R																																													
IT	various (Depends on the actual use of the delivered IT equipment allocated by respective working positions)																																													
Sub-total main capex (2) (in MBGN)	various (Depends on the actual use of the delivered IT equipment allocated by respective working positions)																																													
26 Sept 2014	Czech Republic	Civil Aviation Authority Czech Republic	Vanek	Lukas	Inspector	Vaněk Lukáš <vanek@caa.cz>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	CZ-2014-09-12 RP1 Annual Monitoring Report 2013, Vol 2 – National Overview, page 16 – monitoring of CAP Indicators, part	justification	We would like to provide you with a justification regarding partially missing data (status cancellation reason). With respect to several problematic issues concerning data exchange between stakeholders in the Czech Republic (NSA, slot coordinator, data management at LKPR), we plan to convene meeting at national level with stakeholders involved where the data issues will be thoroughly discussed and new procedures for smooth data transition will be	CAP Apt	NOTED	Action by the Czech CAA noted and reported in Volume 2. Progress regarding this Czech CAA's action needs to be reported to PRB.																														

Date	Country	Name of organisation or company	Last name	First Name	Job Title	Email address	Title of the Document commented	Version of the doc. commented	Date of issue of the doc. commented	# Comment	Chapter/Section/Para/bullet/etc in the document	Proposal for modification / addition	Rationale	Relevant for	Status	PRB position
											Critical Issues		established.			
26 Sept 2014	Czech Republic	Civil Aviation Authority Czech Republic	Vanek	Lukas	Inspector	Vaněk Lukáš <vanek@caa.cz>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	CZ-2014-09-12 RP1 Annual Monitoring Report 2013, Vol 2 – National Overview, page 16 – monitoring of CAP Indicators, part Specific Analysis	justification	We would like to provide you with a justification regarding to deteriorated value of additional ASMA time for 2013 (value of 1.6 min. delay per arrival) in comparison to previous year value (1.0 min delay per arrival). We have been confirmed that the one of the main reasons for this was the general reconstruction of main runway at LKPR (06/24). The reconstruction has been conducted within two phases – the first phase took place from mid of May till end of August and the following phase continued till the end of September. This reconstruction was the largest building activity at the LKPR aerodrome in 2013. Despite the 3% decrease in traffic volume at LKPR the significant contribution of this factor to additional ASMA time in 2013 was confirmed.	CAP Apt	NOTED	Justification noted and reported in Volume 2.
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	PRB Annual Monitoring report 2013 – DK-SE FAB, page 59	General	Regarding: Military dimensions of the plan (Opt.). "For DK airspace FUA is applied with level 1, 2 and 3 governance. Level 2 is handled by a joint civil/military AMC, and level 3 by joint civil/military ATCC."	CAP	Open	Info only
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	PRB Annual Monitoring report 2013 – Denmark , page 64	General	Regarding: Effective booking procedures. "Airspace segregated to military use will always be allocated to civil use regardless of the time notice. On tactical level all airspace that is not used for military operations will be available for civil traffic in real time. Optimised use of airspace is coordinated through the combined civil/military ATCC."	CAP	Open	Info only
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	PRB Annual Monitoring report 2013 – Denmark , page 64	General	Regarding: Previous recommendations (Opt.). "The temporary restricted areas listed in the AIP are allocated to military use as a back-up to the temporary segregated areas (TSA). Use of the areas will be adjusted according to civil traffic flows and have no impact on the ATC capacity. The temporary restricted areas will be allocated to military use on very short notice."	CAP	Open	Info only
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	PRB Annual Monitoring report 2013 – Denmark, page 68	Factual mistake	There are no "determined costs" for Terminal. The area has been covered by full cost recovery and will be up until the beginning of RP2. We suggest that the text is amended accordingly.	COST-EFF	CLOSED	Change implemented in report as suggested
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	PRB Annual Monitoring report 2013 – Denmark, page 68	Typo	There is a typo regarding the amount of (+44.36 NOK...). Should be in Danish kroner (DKK).	COST-EFF	CLOSED	Change implemented in report as suggested
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	PRB Annual Monitoring report 2013 – Denmark, page 70 – 11. General conclusions on the terminal...	General	"While it is not clear how costs are allocated between en-route and terminal..." All relevant information regarding the allocation between en-route and terminal is provided in the reporting tables and the additional information. We suggest to remove this to the beginning of the sentence.	COST-EFF	CLOSED	Change implemented in report as suggested
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	7	PRB AMR 2013 – Volume 3 – Report on Capital expenditure – Denmark, page 9, table 5	General	The status given in table 5 is that of Naviair and not the state-level. The tables should more precisely state that the ANSP-status is given.	CAPEX	CLOSED	Comment accepted. Action: Modification of the title of Table 5.
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	8	PRB AMR 2013 – Volume 3 – Report on Capital expenditure – Denmark, page 11. Bullet 3.6.4	Factual Mistake	The conclusion about excess investments is not correct, since there has been a changing in the planning phase of the project. We suggest using the sentence below: "In 2013 NAVIAIR has spent €200k (-3.0%) less than planned, of which €400k due to the revision in budget for ATM Systems- COOPANS. However, €1M more than planned was spent in 2013 for "CNS Systems - LINK 2000 (CPDLC) +WAM" because of a shift in the planning phase of the project."	CAPEX	CLOSED	PRB comment: Noted. Action: PRB Report updated with the new text.
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013	1.0	10/09/2014	9	PRB AMR 2013 – Volume 3 – Report on	Contribution	We propose a new text as submission regarding the CNS-investments. We therefore submit the following text as	CAPEX	CLOSED	PRB took note of your new contribution.

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							Volume 3				Capital expenditure – Denmark, page 12. Table 7 regarding the CNS-systems		explanation of changes: "Investments in WAM and LINK2000 was initiated in 2013 which was a shift in planning compared to the Performance Plan for RP1. Both investments will be launched in RP1."			Action: your new proposed text will be reflected in Table 7 for CNS.																
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	10	PRB AMR 2013 – Volume 3 – Report on Capital expenditure – Denmark, page 13. 3.6.13 3.6.14 3.6.15	Factual mistake	We understand that this section is summarizing the status of different reporting mechanisms. Our concern is that some conclusions are comparing state-level with ANSP-level and as such inconsistencies will arise when state-level and ANSP-level differs in the status. The following status is given: <ul style="list-style-type: none"> • 3.6.13: <ul style="list-style-type: none"> ○ ITY-AGDL reported No plan on state-level vs Planned on ANSP-level. ○ ITY-SPI reported Late on state-level vs Planned on ANSP-level. • 3.6.14: <ul style="list-style-type: none"> ○ ITY-COTR reported Late on state-level vs Complete on ANSP-level. ○ ITY-FMTP reported Planned on state-level vs Partly complete on ANSP-level ○ ITY-SPI reported Late on state-level vs Planned on ANSP-level • 3.6.15: <ul style="list-style-type: none"> ○ COM11 reported No plan on state-level vs Planned on ANSP-level. <p>We urge the PRB to revise some of the conclusions given the above. More specifically the conclusion made in 3.6.15 about "potential network effect and delays in their implementation may have a negative impact on the deployment scenario". Naviar does not in its technical-operative development have a negative impact on the flow – quite the contrary.</p>	CAPEX	CLOSED	Comment accepted. Action: text modified. To be noted: level of implementation at State level might in some cases impact negatively the timeliness of implementation of the service provider.																
26 Sept 2014	Denmark	Danish Transport Authority	Hansen Ekstrand	Allan	Senior Advisor	Allan Hansen Ekstrand <alek@trafikstyrelsen.dk>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	11	DENMARK Application of the severity classification of the Risk Analysis Tool (RAT)	Factual mistake	By mistake Denmark has reported the total number of incidents rather than the incidents where the RAT is applicable. The 2013 figures shall be: <table border="1"> <tr> <td rowspan="2">SMIs</td> <td>Ground</td> <td rowspan="2">8</td> <td>100%</td> </tr> <tr> <td>Overall</td> <td>0%</td> </tr> <tr> <td rowspan="2">RIs</td> <td>Ground</td> <td rowspan="2">3</td> <td>100%</td> </tr> <tr> <td>Overall</td> <td>0%</td> </tr> <tr> <td>ATM</td> <td>Overall</td> <td>4</td> <td>0%</td> </tr> </table> <p>It should be noted that the ANSP defines ATM-specific occurrences where RAT is applicable as occurrences with total loss of ATM.</p>	SMIs	Ground	8	100%	Overall	0%	RIs	Ground	3	100%	Overall	0%	ATM	Overall	4	0%	SAF	Rejected. Scope for RP1 reporting should be ALL occurrences based on Regulation 691/2010. Note also that values in Monitoring Report are snap shot from April 2014, and these will be updated via the PRB Dashboard in Oct/Nov 2014 once the final AST values are in.	Scope for RP1 reporting should be ALL occurrences based on Regulation 691/2010. Note also that values in Monitoring Report are snap shot from April 2014, and these will be updated via the PRB Dashboard in Oct/Nov 2014 once the final AST values are in.
SMIs	Ground	8	100%																													
	Overall		0%																													
RIs	Ground	3	100%																													
	Overall		0%																													
ATM	Overall	4	0%																													
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	FABEC, p.93	disagreement	2012 actual performance (0.6 min/flight) is better than 2012 FABEC Performance Plan target approved by EC: the cell shall be green.	CAP	accept	Cell changed to same colour as 2012 report [orange]																
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2		12/09/2014	2	FABEC, p.93 (recommendations)	Wrong statement and misleading interpretation of EC recommendation	As written in the above cell of the table where EC recommendation wording is recorded, the recommendation DO NOT require FABEC MS to develop and implement capacity plans that meet the 0.4 reference value in 2014, but at the earliest possible date in RP2. We would like to remind to PRB that this	CAP	OPEN	The original recommendation was never rescinded. FABEC States have not implemented the original recommendation, therefore it remains outstanding.																

Date	Country	Name of organisation or company	Last name	First Name	Job Title	Email address	Title of the Document commented	Version of the doc. commented	Date of issue of the doc. commented	# Comment	Chapter/Section/Para/bullet/etc in the document	Proposal for modification / addition	Rationale	Relevant for	Status	PRB position
													<p>recommendation has been addressed by FABEC authorities in due time (26th June 2013, as required by the recommendation): a letter has been sent to EC (copy to PRB CM) signed by FABEC FPC CM explaining when the 0.4 reference value could be reached in RP2. Since that time, new capacity plans have been required by States in order to reach new RP2 targets for capacity set by FABEC MS in the RP2 FABEC performance plan, under assessment.</p> <p>So, this recommendation has been fully taken into consideration and addressed by FABEC authorities in the most formal way and in the required timeframe: the current PRB statement shall be changed in order to reflect this.</p>			A letter from FABEC stating that they will not comply with a recommendation does not nullify the recommendation.
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2		12/09/2014	3	FABEC, p.93, PRB Capacity assessment	Re-phrase	In the Commission target decision on RP1 only a capacity target for 2014 is included. For the years 2012 and 2013 only reference values are defined. Proposal to change the word "target" into reference value.	CAP	OPEN	
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2		12/09/2014	4	FABEC, p.94 (observations) and p.95 (Airport Performance Monitoring)	Clarify	It is not made clear that the average total ATFM delay, the taxi out time and ASMA are only Pls.	CAP Apt	NOTED	Volume 2, entitled PRB Annual Monitoring report 2013 is related to RP1 Performance scheme, defined by EC Regulation 691/2010, superseded by 390/2013, in which the KPAs, KPIs and Pls are stated. The distinction between KPIs and Pls is not reminded in each individual Volume 2 per state in order to avoid repetition, but in the Chapeau document (Volume 1).
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2		12/09/2014	5	FABEC, p.94 (observations) and 95 (Airport Performance Monitoring)	General comment	<p>The content of these pages show clearly that general conclusions on the development of the Average total ATFM delay, the taxi out time and ASMA per airport at FAB level do not have any added value.</p> <p>Furthermore, it is questionable whether all the delays are caused/manageable by ANSPs. There is a number of other players and a number of unmanageable delay causes.</p> <p>A remark should be made on this issue.</p>	CAP Apt	NOTED	These 3 Pls are stated in EC Regulation 691/2010, superseded by 390/2013, and required to be monitored by these regulations. Their added values at FAB level might be proposed as issue to be discussed in the scope of RP3 preparation.
25 Sept 2014	FABEC	FABEC Financial and Performance Committee	Mayr	Bernhard	Chairman of the FABEC	bernhard.mayr@bmvi.bund.de	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6		General comment	It is notable that Capacity Pls are included in PRB's overview of the FAB report, but Environment Pls are missing in the overview.	GEN	OPEN	Comment only
26 Sept 2014	France	DGAC	LAFOURCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	1	CAPEX FR Chapter 2, 2.6.4	Additional explanation	<p>PRB notes that none of the FABEC level projects has been reported in the CAPEX report:</p> <p>This is justified by the fact that those projects are airspace design projects which are "low capex consuming" with regards to other main capex. As agreed with PRB only main and significant capex are reported.</p> <p>This should be reflected in the PRB statement</p>	CAPEX	CLOSED	Comment accepted. The PRB report updated accordingly.
26 Sept 2014	France	DGAC	LAFOURCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	2	CAPEX FR Chapter 3, 3.9.21	Additional explanation	<p>PRB points out that 3 capex are not described in the ATM Master Plan reporting process when they are listed in the capex reporting.</p> <p>This is mainly due to the fact that those 3 capex are portfolios of projects and activity having to do with day to day infrastructures, equipment and system maintenance and modernization. Subsets of these portfolios, as stand-alone projects, can contribute individually to the Master plan activities and be described with another name.</p> <p>The ATM Master plan reporting process is done directly by the ANSP: it's not appropriate to attribute this to a lack of coordination within the NSA. The two</p>	CAPEX	CLOSED	The rationale accepted and PRB report updated accordingly.

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													reporting process (ATM Master Plan vs performance reporting) are autonomous and have different scopes, references and actors and it's normal at this stage that a full matching isn't reached.			
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	3	CAPEX FR Chapter 3, 3.9.22	Additional explanation	PRB notes that explanation for deviation is lacking for 3 capex in 2013 (Coflight, ERATO, CNS). Explanations are given for meaningful deviations resulting from changes in the investment policy or timeline. There is no added value to justify small deviations in the capex amounts of large projects resulting from small adjustments or the fact that the actual capex has slightly move with regards to a capex amount forecast 3 years before... In addition PRB finds "not clear" the delay of implementation for Coflight. It's true that the explanation is not appearing in the Coflight line reporting, but is linked to the 4 Flight delay explanation : to put Coflight in operation, DSNA needs to have 4 Flight System in operation at the same time and 4 Flight system has been postponed due to functionalities complexity.	CAPEX	CLOSED	The timeline has been delayed significantly i.e. for Coflight from 2013 to 2017-2020. The explanation given now accepted
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	4	CAPEX FR Chapter 3, 3.9.23	Correct factual mistake	PRB notes that no progresses are reported for ERATO, Coflight and CNS, and also for MCO CAUTRA, New airport Grand Ouest, Current system modernization, Infrastructures modernization and Maintenance and renewals. Dates are given for the first three activities in PP and revised one in the 2013 reporting (see table 7). For New airport Grand Ouest, due to political aspects, there is some uncertainties, for the other ones, there are day to day continuous activities organized in subsets of projects : giving a detailed list of dates would be fastidious and a kind of micromanagement which has no added value for performance reporting.	CAPEX	CLOSED	No, PRB Report says that only the progress of COFLIGHT, ERATO & CNS Major programs are missing Yes, correct. They are missing only for CAUTRA & New airport Grand West and & three other projects (see report) Rationale accepted
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	5	CAPEX FR Chapter 3, 3.9.23	Additional explanation	PRB notes that FAB dimension projects are not part of the CAPEX reporting 2013: See comment 1 for justification.	CAPEX	CLOSED	Comment accepted. The PRB report updated accordingly.
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	p.113, Monitoring of safety indicators for 2013	disagreement	Some RAT data have to be corrected or updated. During 2012-2014 the RAT perimeter hasn't been set with precision. DSNA has reported all events SMI / RI & ATM-SE. Data provided to AST for 2013 doesn't include E events. Replace 737 by 893 for SMI 2012. Replace 120 by 230 for RIs 2012 Replace 1558 by 2311 for ATM specific 2013 We would like the following statements to be added in the PRB reporting in this chapter regarding the application of the RAT : "The provision of RAT use for ATM-S was formally introduced by DSNA in July 2013 and is not available for the all reporting period, explaining the 55% 2013 value." "DSNA applies also RAT for ATM-SE that could have had an impact on the ability to provide air navigation services."	SAF	Accepted. However note that update of 2012 values need to be done through AST mechanism as well in order not to have mismatch.	However note that update of 2012 values need to be done through AST mechanism as well in order not to have mismatch. No text to be added.

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													Thank you.			
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	p.114, Monitoring of capacity indicators for 2013	Change color code	As already recalled for 2012 report, there is no target at national level for ATFM delay (only at FABEC level). Reference values for France should be used only as indicative monitoring values. Both EU and FABEC capacity targets are met in 2012 & 2013. Color code shall be changed from red to green.	CAP	OPEN	Graphic is consistent with 2012 report.
26 Sept 2014	France	DGAC	LAFOU RCADE	Stéphane	DTA / MCU / Pôle Ciel Unique	stephane.lafourcade@aviation-civile.gouv.fr	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	8	p.115, recommendations	Wrong statement and misleading interpretation of EC recommendation	As written in the above cell of the table where EC recommendation wording is recorded, the recommendation does not require FABEC Member States to develop and implement capacity plans that meet the 0.4 reference value in 2014, but at the earliest possible date in RP2. We would like to remind to PRB that this recommendation has been addressed by FABEC authorities in due time (26th June 2013, as required by the recommendation): a letter has been sent to EC (copy to PRB CM) signed by FABEC FPC CM explaining when the 0.4 reference value could be reached in RP2. Since that time, new capacity plans have been required by States in order to reach new RP2 targets for capacity set by FABEC MS in the RP2 FABEC performance plan, under assessment. So, this recommendation has been fully taken into consideration and addressed by FABEC authorities in the most formal way and in the required timeframe: the current PRB statement shall be changed in order to reflect this.	CAP	OPEN	The original recommendation was never rescinded. FABEC States have not implemented the original recommendation, therefore it remains outstanding. A letter from FABEC stating that they will not comply with a recommendation does not nullify the recommendation.
26 Sept 2014	Finland	Finnish Transport Safety Agency Trafi	Hannola	Jukka	Development Manager	Hannola Jukka (TRAFI) <Jukka.Hannola@trafi.fi>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Cost-efficiency 7. General conclusion monitoring of the /Notes on information Finland	agreement	PRB noted that data in the 2013 NSA monitoring report and the June 2014 reporting tables are not consistent in some areas. Finland confirms that this statement by PRB is correct and PRB has used right figures in their analysis.	COST-EFF	CLOSED	Noted, in agreement
26 Sept 2014	Finland	Finnish Transport Safety Agency Trafi	Hannola	Jukka	Development Manager	Hannola Jukka (TRAFI) <Jukka.Hannola@trafi.fi>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Capacity / Recommendations	Complete with missing data	Booking statistics regarding individual SUAs are available and will be provided to PRB	ENV	accept	Info only
26 Sept 2014	Finland	Finnish Transport Safety Agency Trafi	Hannola	Jukka	Development Manager	Hannola Jukka (TRAFI) <Jukka.Hannola@trafi.fi>	PRB Annual monitoring report 2013 Volume 3	1.0	12/09/2014	3	ch 3/page 12	agreement	Finland takes into account the shortcomings raised by the PRB	CAPEX	CLOSED	Comment noted
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Safety, Table on Application of the severity classification of the RAT (page 125)	Factual Mistake	The RAT methodology application values are incorrect. It has not been taken into account that according to the FABEC Agreement (notified to the EC) only the ANSPs DFS and MUAC (related to the services provided in German airspace) are included into the Performance Plan. The correct figures will receive the PRB in a separate E-Mail.	SAF	ACCEPTED	Please accept the data sent by German BAF (Magdalena Jancokova), although according to AST Team calculation as received from Focal Point (Dr. Sahlinger) the percentage for the RAT application for RI is totally different (33% instead of 4%). We will check and get back to you. As we are under such a time pressure we may get back with updates by the end of October as in the other cases. Germany included MUAC in update of the RP1 monitoring report (current performance – 2013 figures)
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Capacity (page 128)	Factual Mistake	The additional ASMA data 2012 for Stuttgart is available and was reported by Germany: 0.9 The additional taxi-out time data 2012 for Cologne was reported by Germany: 0.0	CAP Apt	NOTED	Clarification provided as follows: 1 – Only the indicators that can be calculated by the PRU and reported in the online SES Monitoring Dashboard are to be considered in this report.

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																2 - As specified in Volume 2, some indicators could not be calculated by the PRU due to missing data and, consequently, could not be reported in the (e.g. additional ASMA and taxi-out times at both Stuttgart and Cologne in 2012, departure runway is missing at Stuttgart in 2013). PRU is currently coordinating a Remedial Action Plan with the aforementioned airport.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Capacity, 2nd bullet (page 129)	Factual Mistake	For FRA the additional ASMA time 2013 was 2.9 minutes per arrival, meaning -15% compared to 2012. Most probably the 2012/2013 numbers were in this assessment changed by mistake. On this basis the second sentence in this bullet point is no longer valid and must be deleted.	CAP Apt	ACCEPTED	Volume 2 amended accordingly
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	Section 5 (page 131)	Factual Mistake	The amount of € 778,832,000 for "Determined cost after deduction of cost of exempted VFR flights" cannot be retraced as there are no VFR costs deducted in the German cost base.	COST-EFF	CLOSED	As you well indicated no VFR flights cost have been deducted since there aren't any. The amount of € 778,832,000 reported in the <i>risk sharing calculation</i> (item 5), is just the real ATSP determined cost for 2013 adjusted using the actual inflation rates. While in item 5 (first line) of the <i>cost sharing calculation</i> , the amount reported is € 780,345,00, this is the real determined cost for 2013 adjusted using the planned inflation rates. Detail explanation about it can be found in the readers guide.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	Section 6 (page 131)	General	The calculations for 2012A and 2013A cannot be followed as the assumptions made by the PRB on the proportion of financing through debt and equity in 2012A and 2013A are not corresponding to reality.	COST-EFF	OPEN	The economic surplus should be interpreted as something which is analogous to the economic profit, rather than an accounting profit, in respect of ANS provided in the year. Item 6 calculates the estimated economic surplus of the ATSP for the en-route activity and compares planned with actual data for 2012 and 2013. It is important to emphasise that the economic/financial analysis focuses on the ATSP results entitled to the activity in the year 2013. The cash flow position and liquidity balance at the end of the year is impacted by the charging mechanism whereby the eligible under-recoveries (for traffic, etc.) are to be recovered in year N+2 or later. The analysis developed in Item 6 is based on assumptions (in particular for the share of equity and debt used to compute the weighted average cost of capital). The provision from the states of more detailed information on the computation of the cost of capital as part of the June 2014 submissions can improve the PRB understanding and monitoring analysis. Detail information on how the surplus is calculated can be found in the reader guide of the

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																2013 Monitoring Report.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	Section 7 (page 132), "At ATSP level", 4th Paragraph	Factual Mistake	In this whole paragraph on CAPEX and Cost of Capital, Nominal and Real EUR 2009 data seems to be mixed.	COST-EFF	CLOSED	The cost of capital analysis is done in Real terms 2009 Euros (M2009€). A correction have been introduced in the text to avoid confusion. CAPEX Analysis is done in nominal terms (M€) as reported in the NSA. Separately
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	Section 7 (page 132), "At ATSP level", 4th Paragraph	Factual Mistake	The data in the passage "...in the report (some 28.1M€) only represents 21,6% of the total CAPEX..." is not correct. The amount reported by Germany for DFS was 91,8 M€ representing 70,6%. The correct data is in the CAPEX table provided by the German NSA.	COST-EFF	CLOSED	From the 91,8 M€ included NSA report 69.1M€ are reported under the category of "other projects included in the total sum of projects in the revised PP". Therefore cannot be considered, as part of the detail list of associated projects. The figure of 28.1M€ is the sum up of the amounts associated to specific projects as reflected in the CAPEX table of the NSA Report
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	8	Section 8 (page 133)		The 2013 CUR is wrongly rounded. The correct CUR 2013 was EUR 76.50.	COST-EFF	CLOSED	Corrected as suggested
26 Sept 2014	FABEC	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	9	FABEC, Airport Perf. Monitoring (page 95/96)	Factual Mistake	See corrections made under comment No. 2 & 3 of this listing.	CAP Apt	ACCEPTED	See PRB Positions for German comments No 2 and 3
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	10	Germany, Chapter 2.6.12 & 13	Format	Table 3 under 2.6.12 should rather be placed under 2.6.13, as the numbers and references are in 2.6.13.	CAPEX	CLOSED	Accepted. Action: Table 3 placed under 2.6.13.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	11	Germany, Chapter 3.10.1	Factual Mistake	Real 2009 Euros are compared to nominal Euros: €102.1M are in real 2009 terms! €90.1M is a nominal value. Decision must be taken either for nominal OR real terms!	CAPEX	CLOSED	Accepted. Action: Item 3.10.1 updated, i.e. the amount in real terms €2009 inserted
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	12	Germany, Chapter 3.10.1	Factual Mistake	The amount of -7.8M€ less planned investments cannot be found and cannot be validated.	CAPEX	CLOSED	See the new text in item 3.10.1 and the difference between the actual 2014 update planning is computed vs. the planned one for 2014 (in real term 2009). The difference between the planning for 2014 is +23.5M€2009.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	13	Germany, Chapter 3.10.5	Factual Mistake/Rounding Mistakes	The data in Table 6 is wrongly rounded: This is true for all data Plan/Actual/A-P/ and A/P%.	CAPEX	CLOSED	PRB comment: computations are correct (e.g. 18.4 is the result of 120.50 minus 102.1). No action required.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	14	Germany, Chapter 3.10.6	Factual Mistake/Rounding Mistakes	The amounts in € in this Section are wrongly rounded. Where this wrong rounding comes from is not explicable as the data in the tables provided by Germany were correctly rounded. Please check! Wrong are 18.4M, 32.9M, 14.5M, 50.7M, 1.7M, 2M	CAPEX	CLOSED	PRB comment: the figures in 3.10.6 are expressed in €2009 real terms and are correct (see table 7 in section 3). Action: The text in 3.10.6 was updated so the break-down per project to be more clear.
26 Sept 2014	Germany	Federal Supervisory Authority for	Kowoll	Holger	Head of Division Economic	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013	1.0	10/09/2014	15	CAPEX Report 2013 (Vol. III), Germany,	Factual Mistake	In the second sentence it must be "(+18 %)" instead of "(-18%)" for the CAPEX Effect.	CAPEX	CLOSED	PRB Comment: typo corrected. Action: item 3.10.8 updated.

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		Air Navigation Services (NSA)			Oversight		Volume 3				Chapter 3.10.8					
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	16	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.9, Table 7	Factual Mistake	The data provided under "TOTAL planned CAPEX for the project (RP1)" should be identical in the first and the second part of the table as they refer to the same projects. Unfortunately, they differ in the table presented.	CAPEX	CLOSED	In the first part of the table there is a list of projects that stand for "Main CAPEX from previous years carried over to 2013" (i.e main CAPEX 1) whilst in the second part the list refer to MAIN projects planned for 2013 in the PP for RP1. No action required.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	17	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.9, Table 7	Factual Mistake	The data in the last lines "Total main" and "Total CAPEX" differ from the data reported by Germany. The rounding should be checked.	CAPEX	CLOSED	PRB Comment: the figures differ as they are expressed in €2009 (real terms) whilst Germany's submission was expressed in nominal terms. No action required.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	18	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.10	Factual Mistake	The amount of +€23.5M cannot be retraced by the German NSA. What reference is taken here by the PRB? This data is not from the German Report on CAPEX provided in May 2014.	CAPEX	CLOSED	PRB comment: the amount of 23.5M€2009 is the result of the updated 2014 planning expressed in €2009 real terms and not the amounts as reported by DFS (in nominal terms). No action required.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	19	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.11, 1st bullet point	Factual Mistake	The amount of €4.8M cannot be retraced: The amount provided by Germany is €9.1M (real2009) or correspondingly €10.0M (nominal).	CAPEX	CLOSED	PRB comment: the amount for DFS energy was updated and is now 9.1M€2009. All tables/figures are updated accordingly.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	20	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.11, 2nd bullet point	Factual Mistake	The amount of €3.5M cannot be retraced: The amount provided in the reporting is €1.9M (real2009) or correspondingly €2.1M (nominal).	CAPEX	CLOSED	PRB comment: amount in 2 nd bullet updated to 1.9 M€2009
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	21	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.11, 6th and 7th bullet point	Factual Mistake	The rounding of the amounts in bullets points 6 and 7 is wrong and therefore differ from the German reporting.	CAPEX	CLOSED	PRB comment: amounts in bullets 6 and 7 are correct. No change in the report.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	22	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.11, Table 8	Factual Mistake	The € amounts for 2013 (2013 column) are mostly wrongly rounded and therefore differ from the German reporting.	CAPEX	CLOSED	The €2009 amounts for 2013 are correct. No action required
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	23	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.11, Table 8	Factual Mistake	The € amounts for 2014 (2014 column) cannot be retraced and differ completely from the German reporting.	CAPEX	CLOSED	The amounts for 2014 are updated following to above comments 19, 20 and 21.
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation Services (NSA)	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	24	CAPEX Report 2013 (Vol. III), Germany, Chapter 3.10.12 – 3.10.14	Factual Mistake	As a consequence to the mistake listed above under No. 23 of this list the conclusions in the Chapters 3.10.12 – 3.10.14 are wrong.	CAPEX	CLOSED	The figures in 3.10.12 to 3.10.14 are updated (see above)
26 Sept 2014	Germany	Federal Supervisory Authority for Air Navigation	Kowoll	Holger	Head of Division Economic Oversight	Kowoll, Holger <Holger.Kowoll@baf.bund.de>	PRB Annual monitoring report 2013 Volume 4	2.0	22/08/2014	25	Safety Monitoring report 2013 (Vol IV), Chapter 1.4.1, Changes	Factual Mistake	The EASA does not provide feedback to the States on it's thoroughly verification of previous year filled questionnaires.	SAF	Rejected. As regard the State EoSM questionnaire,	As regard the State EoSM questionnaire, EASA noted that some of the States did not take into account the audits performed by EASA and that the

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		Services (NSA)									compared to the previous year, 1st bullet (page 5)					EASA noted that some of the States did not take into account the audits performed by EASA and that the replies did not correspond to what was found during the visit. Therefore, EASA, on a voluntary basis and in order to benefit the authorities, decided to provide feedback to the States as of the third year of the exercise. The goal is to reconcile the self-perception that the States have (scores on the EoSM KPI) with the external view that EASA gains during the audits.
26 Sept 2014	Greece	Hellenic Air Navigation Supervisory Authority	Anastasiopoulou	Kallirroy	Section E - Supervision of Human Resources and Economics	nsa.e@hansa.gov.gr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	1	Volume 3- Report on Capital Expenditure / 3.11.5, 3.11.14	General comment	A list of main CAPEX projects between 2012 and 2014 was included in RP1 NPP. The planned CAPEX reported was the total for RP1 (i.e. 26.4M€) and was not broken down per year since the economic situation in Greece could not guarantee that those investments would be implemented in due time.	CAPEX	CLOSED	PRB comment: your comments are correct. BUT the assessments included in the 2013 PRB Report refer to the actual 2013 CAPEX and not to the planned ones. As you can read, additional data sources were used for the ACTUAL data (i.e. charges reporting provided by Greece in June 2014. No action required.
26 Sept 2014	Greece	Hellenic Air Navigation Supervisory Authority	Anastasiopoulou	Kallirroy	Section E - Supervision of Human Resources and Economics	nsa.e@hansa.gov.gr	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	2	Volume 3- Report on Capital Expenditure / 3.11.6	General comment	CAPEX projects totaling 1,8 M€2009 were commissioned in 2013. The amount for the actual commissioned projects was used as actual 2013 CAPEX.	CAPEX	CLOSED	Noted. No action required.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Volume 2; Monitoring of Safety indicators 2013; ATM specific occurrences	factual mistake	In the monitoring report submitted by the Hungarian NSA an incorrect figure in the prefilled information was confirmed. Please modify it: the number of ATM specific occurrences reported in 2013 is 389 instead of 40.	SAF	ACCEPTED.	Although the number of TECH occurrences for HU is 392, according to AST data, their request of changing the figures to 389 is accepted. We will lease with them again and confirm (or not) by the end of the October and update the dash-board as necessary.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Volume 2; Monitoring of Safety indicators 2013;	additional information	According to the template of the monitoring report if there were questions related to Just Culture where answers YES or NO required clarification these should have been reported in the body of the text under the heading "identification of possible areas of improvements". No such issue was identified, as the Hungarian legislation has not changed related to Just Culture or other safety areas, but since the	SAF	Noted.	Noted.

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													<p>assessment stated that there was insufficient justification in case of safety responses, we give the following addition information for NO answers as identification of possible areas of improvements:</p> <p>“ANSP.P.11 Is there regular training and/or briefings on relevant legislation for safety in the context of Just Culture?: No [N] Evidence:: According to the internal rule mentioned a training concept has been accepted. The realisation of the concept has started and is planned to be finished in the first quarter of 2014. Regular trainings will be held in the 2nd quarter of 2014 and on.</p> <p>ANSP.L.2 Is there any agreement between ANSPs and judicial/police authorities to ensure protection of reported incident data and involved individuals?: No [N] Evidence:: It is impossible to have such arrangements. The legal framework of the state doesn't allow making such agreements.</p> <p>ANSP.O.3 Is there a requirement for staff subject to investigation to sign their agreement / disagreement with the findings of investigations?: No [N] Evidence:: In case of any disagreement with the findings it must be recorded by investigators - it is a general rule included in the internal investigation procedure. The fact of diverting views or disagreement with findings or conclusions is attached to the report as evidence.</p> <p>ANSP.O.4 Is there a formal procedure to inform staff having reported an occurrence of the progress of the investigation?: No [N] Evidence: Internal rules and procedures: It is under consideration to have an automated feed-back system available for everybody.”</p>			
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Volume 2; Monitoring of capacity; effective booking procedures	additional information	It is stated in the assessment that no information was provided regarding the allocation of airspace at H-3. Yet, the information was provided; all the values were 0 due to the regulatory framework of Hungary not allowing such procedure. Please take this additional information into account in the assessment.	ENV	reject	H-3 refers to airspace still allocated three hours before time of activation. If the value is 0, this means that all airspace allocations were cancelled at least three hours in advance.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	Volume 2; Monitoring of en-route and terminal cost efficiency; part 5; traffic risk sharing	typo	In case of the category of determined cost after deduction of costs for exempted VFR flights the phrase 'subject to traffic risk sharing' could be added.	COST-EFF	CLOSED	Rejected: The determined costs mentioned are reported under the traffic risk sharing section and are therefore subject to it.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	Volume 2; Monitoring of en-route and terminal cost efficiency; part 5 and 6 en-route estimated surplus	factual mistake/additional information	When defining the net ATSP gain/loss of 2013, the change in the Hungarian asset management fee calculation should be taken into account. As a result of the agreement with users, asset management fee of 2013 was decreased by 714,9 million HUF in case of en-route activities. Thought the performance plan was not modified, this amount can't be recognized as a gain or surplus of the ATSP since it had to be reimbursed to users in 2014. Therefore the net ATSP gain/loss on en-route activity, the overall estimated surplus for the en-route activity and the calculated profitability indicators (RoE, surplus in percent of revenues) have to be modified. The resulting RoE should be 24,19% due to this correction.	COST-EFF	CLOSED	ACCEPTED. Action: the asset management fee has been included in the calculation of the surplus and the monitoring report has been amended accordingly.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	6	Volume 3; Figure 2	typo	In case of HungaroControl positive signs are indicated instead of negative.	CAPEX	CLOSED	Correct. Action: Typo corrected in Figure 2

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26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	7	Volume 3; Table 7	factual mistake	In the monitoring report submitted by the Hungarian NSA the allocation between en-route and terminal was updated. The assessment does not contain the updated figures.	CAPEX	CLOSED	Noted. Action: Table 7 was corrected.
26 Sept 2014	Hungary	National Transport Authority	Temesi	Istvan	Acting Deputy Head of Division	Temesi.Istvan@nkh.gov.hu	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	8	Volume 3; Table 7	factual mistake	In the monitoring report submitted by the Hungarian NSA the planned date of entry into operation was corrected based on the PP. The assessment does not contain the corrected figures.	CAPEX	CLOSED	Noted. Action: Table 7 updated.
26 Sept 2014	Ireland	Irish Aviation Authority	Kennedy	Paul	Manager ANSD	KENNEDY Paul <Paul.KENNEDY@iaa.ie>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	1	Volume 3 – Report on Capital Expenditure-Ireland – Para 1.4.3, second bullet (v) Para 2.9.2 Para 3.13.1-4.	General	The information provided by Ireland for 2013 is in line with that provided in the 2012 monitoring report. We are disappointed with the conclusions of the PRB 2013 PRB Annual Monitoring Report. The Irish NSA monitoring report for 2014 will provide a detailed and transparent reconciliation of total RP1 planned expenditure vs. actual expenditure. This will provide the required level of transparency to the PRB, and indeed to the airspace users. Going forward, in line with the monitoring requirements for RP2, the Irish NSA will verify that investments included in the RP2 submission are matched with subsequent expenditure, on a project by project basis. The ANSP reporting formats are being updated to reflect this.	CAPEX	CLOSED	NOTED. No action in the report.
26 Sept 2014	Ireland	Irish Aviation Authority	Kennedy	Paul	Manager ANSD	KENNEDY Paul <Paul.KENNEDY@iaa.ie>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	PRB Annual Monitoring Report 2013 – Volume 2. Monitoring of Safety Indicators for 2013. Application of Severity classification of the RAT	General	We are presently conducting a review of the 2013 AST and are due to complete this process on the 30 September. We would like to reserve the right to send any reconciliation on that date.	SAF	Noted.	Noted. PRB will update the Dashboard anyway in October once AST delivers final 2013 data.
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Monitoring of Capacity indicators for 2013 (page 222), section "Effective booking procedures", the last sentence	confirmation	PRB's understanding is correct.	CAP	accept	Info only
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Monitoring of Capacity indicators for 2013 (page 223), section "Airport Performance Monitoring", Missing Airport Performance Monitoring data	general	Addendum of NPP for RP1 of 30 January 2012 clarifies that data will be available at the latest for RP2. Representative of Vilnius Int. Airport reconfirmed their plans to provide these data from 1 January 2015.	CAP Apt	ACCEPTED	Noted in Volume 2
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Monitoring of en-route and terminal Cost-efficiency for 2013 (page 226), part 7 General Conclusions on the monitoring of the 2013 en-route DUR, section "At ATSP level"	general / explanation	The nature of the "write-offs" is the sums of amounts to be written-off in the accounts in accordance to Financial Regulations applicable to the Route Charges system under Article 14 (debts of the users which underwent bankruptcy or became insolvent)	COST-EFF	CLOSED	Noted: Action: Sentence below deleted from the Monitoring Report, in item 7 at ATSP level: <i>The nature of the "write-offs" is not explained in the NSA monitoring report.</i> Sentence deleted.

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26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	Monitoring of en-route and terminal Cost-efficiency for 2013 (page 228), part 10 Terminal costs and unit rates monitoring (2013), section 11 General conclusions on the Terminal ANS costs and unit rates monitoring	general / explanation	The nature of the “write-offs” is the sums of amounts written-off in the accounts – debts of terminal ANS charges of the users which underwent bankruptcy including the national carrier Lithuanian Airlines (Fly LAL).	COST-EFF	CLOSED	Noted: Action: Sentence below deleted from the Monitoring Report in item 11: <i>The nature of the “write-offs” is not explained in the NSA monitoring report.</i> Sentence.
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	5	Volume 3 – Report on Capital Expenditure (Lithuania). Section “Consistency with European ATM Master Plan” page 12, 3.16.12.	general / agreement	NSA LT agrees with this comment. Precise links PRB might find in the National Performance Plan for RP1, these references and links were not resubmitted in the Monitoring 2013 Report as the projects left the same as planned: *Safety nets Level II ((OI-CM-0801 (ESSIP/LSSIP ATC02.5, ATC 02.6; ATC02.7)) *L-SWIM -implementation of enterprise data exchange network. There were no particular objectives dedicated to SWIM ESSIP before/during RP1 elaboration, just pre-requisites for SWIM implementation. *Contingency measures implementation ((ESSIP/LSSIP (2012) GEN01 (data from LSSIP 2011-2013)). *En-route simulator modernization (Eurocat-X) ((ESSIP / LSSIP: HUM 01.1, HUM 02.1, HUM 03.1)).	CAPEX	CLOSED	Accepted. For the next reporting cycle, verify if the respective links with the ATM Master Plan are included as appropriate and in a consistent manner.
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	6	Volume 3 – Report on Capital Expenditure (Lithuania). Section “Consistency with European ATM Master Plan” page 12, 3.16.13	general	Project Automated Assistance to Controller for Seamless COOrd, Transfer and Dialogue (SYSCO level1) ((OI-CM-0201(ESSIP/LSSIP ITY-SPI, AOP04.2))) was planned for 2014, therefore will be reported in 2015.	CAPEX	CLOSED	Accepted. For the next reporting cycle, verify that the missing link with regard to ITY-COTR has been included as appropriate. Please note that in the State’s comment the incorrect ESSIP Objective reference has been made, i.e ITY-SPI, should be ITY-COTR.
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	7	Volume 3 – Report on Capital Expenditure (Lithuania). Section “Consistency with European ATM Master Plan” page 12, 3.16.14	general	Assessment methodology of ESSIP / LSSIP and IDP implementation progress are not consistent and differ.	CAPEX	CLOSED	Noted. However, if it is about the same project, the name / description should be consistent throughout the whole document and/or other relevant documents. Even though there might be differences in the approach of assessment methodologies and/or processes.
26 Sept 2014	Lithuania	Civil Aviation Administration	Vaigauskaitė	Ruta		Rūta Vaigauskaitė <Ruta.Vaigauskaite@caa.lt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	8	Volume 3 – Report on Capital Expenditure (Lithuania). Section “Consistency with European ATM Master Plan” page 9, 2.1.18	general / agreement	PRB’s conclusion is right as the Baltic FAB Implementation Programme was approved by the Baltic FAB Council just in November 2013 due to late ratification of the inter-state agreement.	CAPEX	CLOSED	Noted.
26 Sept 2014	Poland	CAA	Wojtasik	Dariusz	Head of Division	Wojtasik Dariusz <dwojtasik@ulc.gov.pl>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Poland: Monitoring of capacity indicators for 2013; part:	factual mistake	In the column “Airport Name” should be “Warsaw Chopin Airport” (not “Warsaw/Okecie”).	CAP Apt	ACCEPTED	Volume 2 amended accordingly NOTE to PRU: to be changed into the PRISME DB so that it does not appear again next year

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											Airport Performance Monitoring (page 254)					
26 Sept 2014	Poland	CAA	Wojtasik	Dariusz	Head of Division	Wojtasik Dariusz <dwojtasik@ulc.gov.pl>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Poland: Monitoring of en-route and terminal cost-efficiency for 2013; table 7 General conclusion on the monitoring of the 2013 en-route DUR; part: Notes on information provided by Poland (page 257)	factual mistake	In last sentence of the first paragraph should be "PLN" instead of "euro".	COST-EFF	CLOSED	Change implemented in report
26 Sept 2014	Poland	CAA	Wojtasik	Dariusz	Head of Division	Wojtasik Dariusz <dwojtasik@ulc.gov.pl>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Poland: Monitoring of en-route and terminal cost-efficiency for 2013; table 7 General conclusion on the monitoring of the 2013 en-route DUR; part: At State/Charging Area level, fourth paragraph (page 257)	general	The fourth paragraph should be supplemented by information that Poland's CAA costs presented in reporting tables include also Eurocontrol's costs and the increase of Poland's NSA costs is a result of the change in the applicable exchange rate that influence the level of Eurocontrol's costs (cost exempted from cost sharing). While taking into account only the CAA costs the actual figures are lower than planned as it was presented in the part concerning Terminal ANS costs and URs. As a consequence it is proposed to rephrase the said paragraph as follows (added wording bolded): "The en-route cost base includes costs relating to Poland's ATSP (PANSAs), the METSP (IMWM), and Poland's CAA (which include also Eurocontrol costs). While for PANSAs and IMWM, 2013 en-route costs are significantly lower than planned (...), the costs of the CAA are higher than the amount reported in the NPP (+10,2%). The difference in reported CAA's costs results from higher Eurocontrol costs (as a consequence of change in the exchange rate and allocation key) - if only CAA costs are analysed, actual figure is lower than determined costs from the NPP."	COST-EFF	CLOSED	Change implemented in report
26 Sept 2014	Poland	CAA	Wojtasik	Dariusz	Head of Division	Wojtasik Dariusz <dwojtasik@ulc.gov.pl>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	Poland: Monitoring of en-route and terminal cost-efficiency for 2013; table 7 General conclusion on the monitoring of the 2013 en-route DUR; part: At State/Charging Area level, last paragraph (page 257)	general	The last paragraph should be redrafted as the main cost difference result from lower PANSAs's costs and not IMWM's costs. The current explanation refers only to IMWM's costs and suggests that the cost reductions for Poland as a whole are a consequence of lower costs of IMWM – in case of IMWM the difference for 2013 is only 1,1 MPLN, while for PANSAs the difference amounts to 81MPLN. Therefore evolution of IMWM's costs is not the main driver of the difference. As a consequence it is proposed to replace the current wording in the paragraph with the following text: "Overall, Poland's en-route charging zone cost reductions were driven by lower staff costs for all entities concerned and other operating costs for PANSAs. Actual depreciation costs and cost of capital are significantly lower than planned (approximately - 28% for both) due to partly unrealized investment plan of PANSAs and IMWM."	COST-EFF	CLOSED	Change implemented in report
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	1	Consistency with European ATM Master Plan/Item 3.22.13/Page 13	Clarification	Noted the sentence "The scope of the project 'TWR ATM' is unclear." Clarification: The project is deploying during the RP1 period new versions of the ATM systems which support the services of several ATS units in the Lisbon FIR. These versions are linked to functionalities being deployed on the ACC ATM system, and include enhancements on ground-ground coordination's, contingency, CDM (ALS), CDA (AFR), and separation reductions.	CAPEX	CLOSED	Comment accepted. However, according to this clarification the links to the Master Plan elements provided are clearly inconsistent with the description of the project (e.g. AUO-0301 - Voice Controller-Pilot Communications (En Route) Complemented by Data Link). The relevant bullet in the report has been changed from "The

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																<i>scope of the project 'TWR ATM' is unclear. The links to the OI Steps provided do not help to understand the project and seem inconsistent." to "The description of the project 'TWR ATM' is inconsistent with the links to OI Steps provided. Portugal should ensure a clear link of this project with the relevant Master Plan Level 3 elements".</i>
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	2	Consistency with European ATM Master Plan/Item 3.22.13/Page 13	Clarification	Noted the sentence "The scope of the project 'SDT ATM' is unclear." Clarification: The capex designates the Systems Development and Testing platform which host all the ATM systems Development, Verification and Validation processes. This facility offers the capability of support, in a cost effective way, all the different ATM systems, avoiding the expenses to deploy a reference chain system for each single ATM system, This platform hosts also the ATCO pre On Job Training to provide the training required by the regulations for each ATM system version.	CAPEX	CLOSED	Comment accepted. The relevant bullet in the report has been removed.
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	3	Consistency with European ATM Master Plan/Item 3.22.13/Page 14	Clarification	Noted the reference to "Replacements of VORs, TACAN and DME's' links". Clarification: The mentioned CAPEX is linked to two main objectives: a) To keep the navigation services offer with the replacement of aging systems. b) To support the national PBN plan under which the navigation services (en-route and terminal) will be enhanced.	CAPEX	CLOSED	Comment accepted. It is understood that the project 'enables' the implementation of the referred OI steps rather than 'implementing' them. The relevant bullet in the report has been removed.
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	4	Consistency with European ATM Master Plan/Item 3.22.13/Page 14	Clarification	Noted the reference to "LISATM 9.1 and 9.2 links". Clarification: the assumptions referred about the CAPEX links to the FCM03 and ATC07.1 (AMAN) and AOP05 (CDM) are correct.	CAPEX	CLOSED	Comment accepted.
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	En-route and terminal Cost-efficiency for 2013 Section 6/ En-route ATSP estimated surplus (2013)/ average interest on debt (in %)	Factual mistake	The Reporting Tables downloaded from ETNA were wrongly updated in line 3.7 for the ANSP and, by mistake, were not duly corrected when uploading. The right interest for debt is 1.9% and its relative weight is 14%, while the ex-ante RoE pre-tax rate and proportion are 7.6% and 86% respectively. Calculations have been properly updated based on above (see Table below).	COST-EFF	CLOSED	Change implemented in report as suggested
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	En-route and terminal Cost-efficiency for 2013/ Section 7/ General conclusions/NAV Portugal net gain and estimated surplus 2013	Factual mistake	In 1st paragraph (1st line) it is mentioned that "the en-route activity for the year 2013 generated a net gain +7.6 M€2009 for NAV Portugal overall." We assume that the correct amount to be considered is +5.6 M€2009 (Section 5).	COST-EFF	CLOSED	Noted and corrected
26 Sept 2014	Portugal	CAA	Sequeira	Jose		Jose Joao Sequeira <jose.sequeira@inac.pt>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	En-route and terminal Cost-efficiency for 2013/ Section 7/ General conclusions	General	As a general comment, NAV Portugal ex-post RoE pre-tax rate is being impacted by the fact that, until now, the entity has not been reimbursed by the Portuguese State, for the costs incurred with exempted IFR flights, in accordance with Article 10 of the Commission Regulation N° 391. Taking this into account, the adjusted rate would be 24.1% for en-route Lisboa, instead of the estimated 27.3%. Moreover, NAV Portugal also runs the en-route activity in Santa Maria, which is not part of the Performance Scheme. If we make a similar	COST-EFF	CLOSED	Noted but RoE it is calculated according to the fixed methodology set out in the file. A detail explanation of the item 6 calculation can be found in the reader guide of the 2013 Monitoring Report. Regarding the Santa Maria activity, the analysis in the monitoring report remains valid

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													calculation for Santa Maria (where the traffic deviation was -4.6%), the consolidated RoE rate reduces to 19.9%.			since it is already clear that it refers to Nav Portugal Continental.
26 Sept 2014	Slovenia	CAA Slovenia	Jansa	Srecko	Sectoral Secretary	Srecko.Jansa@caa.si	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Monitoring of CAPACITY indicators for 2013, Effective booking procedures & Recommendations (page 296)	Complete with missing data	Slovenia did not provide in due time the data in support to tasks referred to in Article 4(1)(m) and (n) of Commission Regulation (EC) No 2150/2005. Please amend the final version of the 2013 monitoring report with assessment of the provided data demonstrating the use of civil military airspace structures in Slovenia, which was sent to PRU on 19 September 2014 (in attachment to the e-mail).	ENV	accept	Data updated
26 Sept 2014	Slovenia	CAA Slovenia	Jansa	Srecko	Sectoral Secretary	Srecko.Jansa@caa.si	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Monitoring of en-route and terminal COST-EFFICIENCY for 2013 (page 299), item 5:"Focus on ATSP", table "Traffic risk sharing" , line 2	disagreement	Amount 25.684 EUR for Determined costs after deduction of costs for exempted VFR flights should be (according to our understanding since there were no determined costs linked to VFR) 25.484 EUR and everything linked to that figure properly amended.	COST-EFF	CLOSED	As you well indicated no VFR flights cost have been deducted since there aren't any. The amount € 25.684 reported in the <i>risk sharing calculation</i> (item 5) is just the real ATSP determined cost for 2013 adjusted using the actual inflation rates. While in item 5 (first line) of the <i>cost sharing calculation</i> , the amount reported is € 25.484, this is the real determined cost for 2013 adjusted using the planned inflation rates. More information about it can be found in the readers guide
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of SAFETY indicators for 2013. Application of the severity classification of the Risk Analysis Tool (RAT). Page 305	Inconsistency	There is a mismatch between RAT values provided by AESA and those listed in this document. First of all, although we did the same comment last year, we have considered appropriate to do it again: if the Risk Analysis Tool (RAT) methodology application is based on the Annual Summary Template (AST), why do we have to report the RAT methodology application in our Annual Monitoring Report? Second and most important, we don't know how EASTER (AST's queries) has been programmed. We are requested a target and we don't know how the indicator is computed. So, we need more information regarding AST's queries in order to align the AST results with the ones provided by us in our Annual Monitoring Report.	SAF	Noted.	No further info provided. Spain haven't sent updated figures via AST in July 2014 after query from the PRU. However, AST Team still trying to confirm RAT values and number of occurrences.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. Table-Military dimension of the plan. Page 306 "Although specifically requested in IR 691/2010 Annex II Template for Performance Plans, para. 4: the Performance Plan for Spain did not contain any specific details of how FUA would be applied to increase	General	The comment is not aligned with what was requested in the 2013 monitoring report template. The 2013 monitoring report template only required listing the number of SUAs and the number of hours for the indicator Environment #1. Should additional clarifications or information be required, it is recommended to include a specific note requesting this information in future templates. Nevertheless, we take note on this request for next monitoring reports. AESA is working together the military and civil ATS providers in FUA aspects, as it was commented in the SW FAB performance plan for RP2 with view to improve current capacity levels. For completeness, during 2013 a number of actions were taken in order to improve FUA, mainly restructuring some existing routes and the deployment of a new institutional structure for the management of this programme.	ENV	OPEN	To be considered in revised template.

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											capacity."					
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. Table - PRB Capacity assessment. Page 307 "As in 2012, Spain has provided sufficient capacity to be consistent with the effort required to meet the EU-wide capacity performance target. Since the national target was so far removed from the actual performance, it is difficult to determine the premise on which it was derived. However, the PRB is greatly concerned that Spain is continuously degrading the capacity plans, year on year, at the ACCs. Since Spain has not yet achieved the level of capacity performance expected in 2014, the downgrade of capacity plans forewarns of a capacity crisis in Spain during RP2."	General	Spain established the capacity targets for RP1 within the National Performance Plan on the basis of the existing situation and traffic forecasts. It was not binding at that time to establish intermediate targets in 2012 and 2013, only 2014 target was, and the goal to achieve 0.5 minutes in 2014 was a demanding one after a worse past performance (i.e. 1.93 result in 2010). What PRB refers as "continuously degrading capacity plans" was no more than an adaptation to traffic patterns: IFR flights decreased a cumulated -9% from 2011 to 2013. Spain has also other demanding targets in the NPP to achieve, being efficiency a key issue to assure a good balance among all of them, therefore not over sizing resources. The required performance was therefore accomplished, as the ATFM en-route delay trend either in 2012 or 2013 shows that the 0.5 target in 2014 is now achievable, and the level of capacity provided is clearly adequate and commensurate to the situation. In the view of the above arguments, AESA does not share PRB conclusion forecasting a "capacity crisis in Spain during RP2". The PRB report should concentrate on the 2013 evaluation, which showed clearly a good performance for Spain. Additionally, the capacity plans of Spanish ACCs included in the last version of the Network Operations Plan – NOP 2014/2018-19, show a planned increase in the capacity of all of them. It is therefore proposed to revise the complete paragraph (from "Since the national target ..." to "... during RP2"), taking into account the actual performance in 2013 against the indicative national capacity value for 2013 and the trend to 2014 target.	CAP	OPEN	
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. NSA report on follow-up to recommendations (Opt). Page	General	This information was not specifically requested in the monitoring template. In consequence, no further details were provided. Nevertheless, as previously commented, the capacity target has been achieved and capacity information has been provided whenever required as for the Network Operations Plan 2014/2018-2019, which shows a planned increase in capacity.	CAP	OPEN	To be considered in revised template?

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											307 "There was no reference to the development and implementation of revised capacity plans"					
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. Recommendations. Page 307 "The PRB request Spain to provide information on how the capacity planning of the ANSP is consistent with the existing recommendation of the European Commission that Spain will require its air navigation service provider to develop and implement capacity plans that will enable the 2014 reference value of 0.31 minute of average delay per flight to be met at the earliest possible date in the second reference period, with the assistance of the Network Manager."		The justification is provided in comment #3. Additionally, the PRB recommendation is clearly more focused in RP2 period and therefore we recommend addressing it in that context. This report should provide recommendations for the 2013/2014 period, which is already established an approved within the Spanish National Performance Plan framework.	CAP	OPEN	0.31 minutes delay per flight has never been achieved in Spain, but yet capacity plans have been downgraded.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. Airport Performance Monitoring for Spain Continental and Spain Canarias. Critical Issues. Pages 308 and 309.	Consistency	It is urged to the PRU to clarify the causes for such differences as soon as possible due to the noticeable differences in the values for some specific airports which might affect to the conclusions.	CAP Apt	NOTED	Action taken by PRU

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											"As reported in the Spanish Monitoring NPP 2012 report, ASMA and Taxi-Out values from AENA AN are different from the ones included in the PRB Dashboard. Work is in progress with PRU in order to clarify the causes for such differences, avoiding potential misunderstandings when analysing results."					
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- National overviews FOR FACT VALIDATION (2). Monitoring of CAPACITY indicators for 2013. Airport Performance Monitoring for Spain Continental and Spain Canarias. Tables. Pages 308 and 309.	Clarification	It is not clear on what basis it is concluded that the 2013 situation represents a stabilized performance with respect to 2012 figures in some cases. It is difficult to understand that a reduction of -39% in the number of minutes of airport ATFM arrival delay for Spain Continental is not considered a performance improvement. It seems, although it is not clearly explained in the document, that only a difference higher than 0,5 min/movement in the weighted average of 2012 with respect to the 2013 figure can be considered a performance improvement. Nevertheless, no further explanation on how the weighted average value has been obtained is provided. Please, provide further clarifications on this issue for Spain Continental and Canarias.	CAP Apt	NOTED	Clarification provided in amended Volume 2 as follows: 1 - performance improvement/degradation can result from absolute performance values only, and not relative. For instance, a reduction of ATFM delay from 4 minutes/departure to 3.4 minutes/departure (i.e. -36 second/departure) is certainly more significant from both the operational and statistical perspectives (given the 1-minute accuracy of raw data) than a reduction from 0.2 to 0.1 minute/departure (i.e. -6 seconds), although in the 1 st case, this represents -15% only compared to -50% in the 2 nd case. 2 - The 30-second threshold to identify performance improvement/degradation can be re-discussed in the scope of the PRB Annual Monitoring Report 2014.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	8	Volume 2- Part 7 General conclusions on the monitoring of the 2013 en route DUR, Note 1. Page 313. "Note 1: Correction to the actual cost of capital reported for Aena."	General	According to the letter sent on September 9 2013 to the European Commission, Article 7.3 of Regulation N°. 391/2013 is not in force until the year 2015, it is not mandatory to include the return on equity provided in the performance plan. The current legislation is Article 6 of Regulation No 1794/2006 which specifies that the return on equity shall be based on the actual financial risk incurred by the air navigation service provider. "... the return on equity shall be based on the actual financial risk incurred by the air navigation service provider..."	COST-EFF	OPEN	Ex-ante (pre-tax) RoE is the planned Return on Equity (percentage), as reported in the NPP and the June 2014 Reporting Tables. In some cases, through the analysis of the different documentation, it was found that the rate of RoE as reported by the ATSP in the NPP and/or the Reporting Tables was not the pre-tax rate used for calculating the cost of capital as foreseen by the Charging Regulation. In these cases, the cost of capital and RoE were recomputed and the details of the adjustments/corrections made are described in the note on top of Item 7.
26 Sept	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-	PRB Annual monitoring	3.0	12/09/2014	9	PRB ANNUAL MONITORING	General	Article 2 of the Commission regulation (EU) N° 1191/2010, authorizes those Member States with	COST-EFF	CLOSED	The 2013 Monitoring analysis uses exactly the same risk

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2014						pineda@seguridadaerea.es>	report 2013 Volume 2				REPORT 2013 – SPAIN- Volume 2- Part 7 General conclusions on the monitoring of the 2013 en route DUR, Note 2. Page 313. "Note 2: Exemption from the application of the dead-band in traffic risk sharing"		national regulations which existed prior to 8 July 2010, that established a reduction on the unit rate beyond the Union wide target, to exempt their ANSPs from article 11a (3); which is the case of Spain. Because of that Spain consider that the range of the dead-band is not shared and it is allocated 100% to users. So any gain or losses resulting from the difference in traffic between +2% and -2% is allocated to users.			sharing approach as that adopted by Spain for 2013. Therefore the range of the dead-band is not shared and it is allocated 100% to user For the purpose of this analysis there has been no traffic risk sharing applied to the dead-band, i.e. any gains (or losses) resulting from the difference in traffic between +2% and -2% is allocated to users. Only for 2012, the EC interpretation of the exemption of risk sharing was used. The application of this exemption reflects the European Commission's interpretation of this article, i.e. the application of the 30%/70% risk sharing on the difference in traffic between +2% and -2%.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	10	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- Part 7 General conclusions on the monitoring of the 2013 en route DUR, Final Note.	General	The deep commitment of Spain with the EU Performance Scheme and the Spanish policy of freezing the on Route unit rate, is shown on the cost reduction from planned costs of (-4.5%) for Spain Continental and (-6.1%) for Spain Canary Islands. Even though there has been a slump on traffic from planned (-12.3%) for Spain Continental and (-13.2%) for Spain Canary Islands.	COST-EFF	CLOSED	Noted and highly appreciated.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	11	PRB ANNUAL MONITORING REPORT 2013 – SPAIN- Volume 2- Monitoring of en-route and terminal cost efficiency for 2013. 5-Focus on ATSP-“Net” ATSP gain/loss on en-route activity in 2013	General	As it is recognized in the report, this analysis focuses on the ATSP results entitled to the activity in the year 2013 and it does not consider the cash flow position and liquidity balance at the end of the year which are impacted by the charging mechanism whereby the under-recoveries are to be recovered. Since the calculation process is similar to that related to year 2012, we have to point out again that we consider the methodology applied as questionable. The analysis is just a kind of theoretical exercise that does not reflect the economic result of the ANSP and therefore, in our opinion, it should be recommended to be very careful in the treatment of the results in its true meaning. Thus, it has to be highlighted that the arithmetic exercise carried out does not contemplate the impact of the charging policy of the State by which, in the calculation of the Spain Canarias unit rate, an artificial reduction has been made through income that Aena does not receive (income from other sources), amounting to 9.9 M€ in 2012 and 8.3 M€ in 2013. Similarly, the net result amount (11,938 M€ 2009 in 2012 and 63,127 M€ in 2013 2009) is taking for granted the total recovery of the rights arising from the traffic risk which, apart from being uncertain in the future, will have to be compatible with adjustment mechanisms and other recovery rights pending from previous years and the mentioned charging policy of the State. That is to say, income that is only virtual and pending to be recovered is being considered as real when it cannot even be accounted/registered as 2013 income since it is not allowed according to accounting regulations. As a conclusion, it's a theoretical arithmetic exercise that can lead to dangerous conclusions and, besides, in the case of Aena it has to be emphasized that the basis of the result is product of the enormous effort of costs reduction that has made possible to offset the great traffic deviation with respect to NPP forecast. An alternative analysis from the “surplus analysis”	COST-EFF	OPEN	PRU will analyses the detail information sent by Spain on this comment for further consideration and exchange of views with Spanish authorities. Still below you can find some clarifications. The economic surplus should be interpreted as something which is analogous to the economic profit, rather than an accounting profit, in respect of ANS provided in the year. SES ATSPs are now subject to risk sharing arrangements which have direct implications on their profitability (the economic surplus generated by the ATSP with respect to the en-route activity performed in the calendar year and ex-post return on equity) and financial strength. In this context, the amount of surplus in percentage of the en-route revenue/cost is comparable to the “profit margin” generated by the ATSP with respect to the en-route activity of the year. A surplus can be positive (“profit”) or negative (“loss”). More specifically, Item 5 shows the various steps to calculate the net ATSP gain or loss on en-route activity, taking into account the impact of the cost sharing and traffic risk sharing arrangements and additional gains/penalties resulting from

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													could be the "Actual Revenue Surplus Analysis": The PRB surplus analysis takes into consideration the amounts that the ATSP has the right to receive corresponding to 2013. However, if the actual income is considered, i.e., the approved unit rate multiplied by the number of actual service units(*), then the actual revenue would be the object of analysis.			financial incentives linked to capacity and/or environment where applicable. This allows computing a net gain/loss for the ATSP with respect to the en-route activity in the year 2013. Item 6 calculates the estimated economic surplus of the ATSP for the en-route activity and compares planned with actual data for 2012 and 2013. It is important to emphasise that the economic/financial analysis focuses on the ATSP results entitled to the activity in the year 2013. The cash flow position and liquidity balance at the end of the year is impacted by the charging mechanism whereby the eligible under-recoveries (for traffic, etc.) are to be recovered in year N+2 or later. The analysis developed in Item 6 is based on assumptions (in particular for the share of equity and debt used to compute the weighted average cost of capital). Detail information on how the surplus is calculated can be found in the reader guide of the 2013 Monitoring Report.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	12	PRB ANNUAL MONITORING REPORT 2013 – SPAIN Volume 2- Monitoring of enroute and terminal COSTEFFICIENCY for 2013. 9- Spain Continental en-route DUR 2013 vs. 2013 actual unit cost for users.	Mistake	The 2013 AUC-U estimated in the report (84.45€) does not seem correct. With regard to traffic adjustment, instead of 1.77 the correct amount would be 1.40 and therefore the figure for total adjustments would be 9.26 instead of 9.63. According to our estimation, the correct value for 2013 AUC-U would be 84.08€.	COST-EFF	OPEN	The traffic adjustment seems correct. We are not clear on how Spain calculates 1.40. More detail information about where this figure it is calculated would be appreciated .
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	13	PRB ANNUAL MONITORING REPORT 2013 / Volume 3 – Report on Capital Expenditure / 2.8.15	Mistake	Spanish LSSIP reported that ITYFMTP was planned for 2015 (in the case of IPv6 only). That is, IPv4 was planned for 2014, in accordance with article 7 of Regulation 633/2007 modified by Regulation 283/2011. In the view of this, Paragraph 2.8.15, second bullet (i) should be replaced by: ITY-FMTP: as reported in the LSSIPs, FMTP based on IPv4 is planned both in Portugal and Spain. ITY-FMTP will be deployed in consecutive phases by NAV Portugal (2014) and AENA (2015) Reference to Regulation 29/2009 should be eliminated in paragraph 2.8.15 second bullet (i): "In both cases the final implementation date goes beyond the regulation 29/2009" In any case, reference could be made to Regulation 633/2007. It is proposed to delete paragraph 2.8.15 second bullet (ii)	CAPEX	CLOSED	Comment partly accepted. The wrong reference to Regulation 209/2009 will be replaced by a reference to Regulation (EC) 633/2007, as amended. However the rest of the text should stay as is since this comes directly from the ESSIP Report 2013, FAB View, page 72, which was provided by the Spanish contributors to SESAR WP C02, Task 7.

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													"the lower completion degree... The actual fact is that the implementation of FMTP depends upon the implementation by both ends (collateral centres) and that AENA was leading the development of the required system modifications.			
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	14	PRB ANNUAL MONITORING REPORT 2013 / Volume 3 – Report on Capital Expenditure / 3.26.7 First bullet	Explanation	It is recommended to clarify last phrase into brackets, as follows: part of Mode-S deployment planned in 2013 has been postponed to 2014	CAPEX	CLOSED	Explanation provided for the 2013 actual CAPEX reporting.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	15	PRB ANNUAL MONITORING REPORT 2013 / Volume 3 – Report on Capital Expenditure / 3.26.7 Second bullet	Explanation	It is recommended to replace all the bullet as follows, to explain it in a consistent way: VoIP (€1.2): It is again mentioned that the budget has been adjusted provided that the entry into operation is still aligned to the ESSIP objective COM11 (2020). The budget spent less for this project in 2013 it's assumed that it will be spent in the following years as needed.	CAPEX	CLOSED	Comment accepted: Text for VoIP was updated.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	16	PRB ANNUAL MONITORING REPORT 2013 / Volume 3 – Report on Capital Expenditure / 3.26.8 / Table 6	Clarification	It seems that values within the table are all in EUR2009, with the exception of the column "TOTAL planned CAPEX for the project (RP1)", which seems to be in nominal EUR. Please clarify and amend values, if needed. It seems that a different inflation index is used to convert "2013 Planned CAPEX" and "2013 actual CAPEX". It is therefore proposed to include in an annex a description of this procedure, so it is possible to analyze it correctly.	CAPEX	CLOSED	All CAPEX figures in Table 6 are in €2009 (real terms). Moreover, Spain (see also in 2012) has not provided planned CAPEX amounts per year for RP1 and the planned amounts are in line with what you reported now for 2013 monitoring (see also comment in 3.26.4).. Inflation rate used for actual 2013 was 1.5%.
26 Sept 2014	Spain	Spanish NSA	Gomez	Ana Luna		Gómez-Pineda Luna Ana <agomez-pineda@seguridadaerea.es>	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	17	RP1 Annual monitoring report 2013-Vol 4-Safety. 3.3.4 RAT methodology application for severity classification. Page 50. Figure 28	Mistake	AESA acknowledges the fact that the percentage of RAT is not very high for SMIs and RIs on ATM Overall. Nevertheless, this percentage achieves 100% for ATM Ground. This is not reflected in Figure 28 of the document, where the percentage for ATM Ground and ATM Overall are the same. This comment is linked with comment #1, where it is noted a mismatch between the information provided in the monitoring report 2013 and the values provided in document PRB ANNUAL MONITORING REPORT 2013 – SPAIN-Volume 2.	CAPEX		
26 Sept 2014	Sweden	Swedish Transport Agency	Noréus	Eva	Senior Advisor Air Navigation Services	Noréus Eva <Eva.Noreus@transportstyrelsen.se>	PRB Annual monitoring report 2013 Volume 2		12/09/2014	1	DK-SE FAB page 15 Minutes of ATFM delay, Military dimension	disagreement	Please see RP1 2.2.2.2 Free Route Airspace item 2. FUA has been implemented in Sweden since 1978, before the concept was defined on European level and the benefit is already achieved, therefore it is very hard to increase capacity Note also the SUA use. 96 % 2013 an effect of effective use of FUA.	CAP	OPEN	
26 Sept 2014	Sweden	Swedish Transport Agency	Noréus	Eva	Senior Advisor Air Navigation Services	Noréus Eva <Eva.Noreus@transportstyrelsen.se>	PRB Annual monitoring report 2013 Volume 2		12/09/2014	2	Sweden page 74 Minutes of ATFM en-route delay Military dimension	disagreement	Please see RP1 2.2.2.2 Free Route Airspace item 2. FUA has been implemented in Sweden since 1978, before the concept was defined on European level and the benefit is already achieved, therefore it is very hard to increase capacity Note also the SUA use. 96 % 2013 an effect of effective use of FUA.	CAP	OPEN	
26 Sept 2014	Sweden	Swedish Transport Agency	Noréus	Eva	Senior Advisor Air Navigation Services	Noréus Eva <Eva.Noreus@transportstyrelsen.se>	PRB Annual monitoring report 2013 Volume 2		12/09/2014	3	Sweden page 78	Correct factual mistake	First section: NSA has corrected this inconsistency and 1932 MSEK is correct.	COST-EFF	CLOSED	Change implemented in report
26 Sept 2014	Sweden	Swedish Transport Agency	Noréus	Eva	Senior Advisor Air Navigation Services	Noréus Eva <Eva.Noreus@transportstyrelsen.se>	PRB Annual monitoring report 2013 Volume 3		12/09/2014	4	DK-SE Sweden page 3 1.4.3 (iv)	Correct typo	DK-SW shall be DK-SE	CAPEX	CLOSED	Comment accepted. Action: modification of the text.

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26 Sept 2014	Sweden	Swedish Transport Agency	Noréus	Eva	Senior Advisor Air Navigation Services	Noréus Eva <Eva.Noreus@transportstyrelsen.se>	PRB Annual monitoring report 2013 Volume 3		12/09/2014	5	Vol 3 DK-SE Sweden page 6 Figure 1	Correct typo	2013 DANUBE FAB shall be 2013 DK-SE FAB	CAPEX	CLOSED	Comment accepted. Action: modification of text.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Monitoring of safety indicators (p147) / Application of severity classification of RAT tool	Factual mistake	The figures (both "No reported" and "assessed %") are wrong. In CH the RAT is only applied at ZRH and GVA (=airports under performance scheme). Hence, as basis for calculation of the "assessed %", only the reports concerning ZRH and GVA must be included. Again, the correct figures to be included in the report are the following ones (Values are for ground and overall): - SMI: 100 cases, 91 assessed with RAT = 91% - RI: 3 out of 5 = 60% - Tech.: 6 out of 6 =100% The same problem occurred for the 2012-reporting and was mentioned in a debriefing teleconference with PRU and PRB on the 7th of November 2013. Concerning the comment on page 147 "Above RAT methodology application values are different from the ones in State Report. The AST results are updated and confirmed by Switzerland after request for clarification.": Neither the FOCA-focal point for performance (Florian Kaufmann) nor the FOCA expert for safety performance (Laure-Noelle Pirali) have been contacted regarding this matter or have confirmed any figures. Please address all requests to the focal point of performance in the future.	SAF	REJECTED Scope for reporting RAT Methodology application in RP1 is ALL occurrences, not only A-C or AA-C.	We shall change the 2013 RAT numbers for Switzerland as indicated below. Actually the number of RI is modified to 5 as these are the only ones reported at the airports of Zurich and Geneva. For the SMI and Technical the numbers remain unchanged as the comment received from Laure Noelle Pirali-Fink (here in Cc) only considers those occurrences in severity category A-C. As we all know, irrespective of the agreements at the level of FABEC, the scope of the RAT methodology application for RP1 does not take into account the event' severity.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	En route ATSP estimated surplus, page 152	Disagreement	Percentages indicated are wrong! - Estimated proportion of financing through equity (in%) are: 54, 62, 54, 62, 55 (2014P) Estimated proportion of financing through debt (in%) are: 46, 38, 46, 38, 45 (2014P)	COST-EFF	CLOSED	Corrected as suggested. Please Note that the percentages were calculated based on the information provided in the Switzerland en-route Reporting Tables. The correction of estimated proportion of financing, results in an inconsistency between the cost of capital reported in the Reporting Tables and the sum of the estimated interest on debt and estimated surplus embedded in the cost of capital.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	Monitoring of Capacity Indicators for 2013 / page 149 / Recommendations	Correct factual mistake	The EC recommendation is to require from the States that the capacity plans allow meet the FABEC reference value of 0.4 minutes per flight at the earliest possible date in the second reference period and not in 2014 as stipulated in the Recommendation. Also, the EC recommendation was based on traffic assumptions that differ from the actual traffic.	CAP	OPEN	The original recommendation was never rescinded. FABEC States have not implemented the original recommendation, therefore it remains outstanding. A letter from FABEC stating that they will not comply with a recommendation does not nullify the recommendation.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	Monitoring of Capacity Indicators for 2013 / page 149 / Recommendations	general	In 2013, CH reached the EU breakdown reference value for 2014, demonstrating the consistency of its capacity plan with the published FABEC capacity target (fully in line with previous recommendations (Recommendation a), page 148). Furthermore this recommendation seems to be in contradiction with the PRB Capacity assessment (page 148).	CAP	OPEN	The recommendation applies jointly to Switzerland and the other FABEC States, not to Switzerland alone.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	8	Monitoring of Capacity Indicators for 2013 / page 150 / Airport / Critical Issues	Clarify	Not clear which mandatory data items are missing. Please specify further!	CAP Apt	NOTED	As specified in Volume 2, data is missing regarding cancellation flights, including STATUS C.R. The PRU will contact FOCA in order to fix the issue.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013	1.0	10/09/2014	2	3.28.12	Disagreement	Where do the -32.9% come from and what plan over-estimation and what changes in the investment policy are meant? Please specify further!	CAPEX	CLOSED	Accepted, as the information provided in 3.28.12 is already

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					Manager		Volume 3						Without a clear answer, we cannot accept the whole point 3.28.12			explained in 3.28.11. Action: item 3.28.12 will be deleted.
26 Sept 2014	Switzerland	FOCA	Kaufmann	Florian	ANS Performance Manager	florian.kaufmann@bazl.admin.ch	PRB Annual monitoring report 2013 Volume 3	1.0	10/09/2014	3	3.28.15	Correct factual mistake	The correct information is as follows: - LINK2K+/CPDLC entry into operation = 2013. Forecast 2014 = 0 Enhanced mode S entry into operations = 2015. Forecast 2014 = 376	CAPEX	CLOSED	Comment accepted
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Reader's guide, paras 2.1.7 and 2.1.9	General remark	Note that profit margin in the way it is used in this para does not represent the actual ANSP's profit margin, because it concerns only the ATC activities in the year concerned and does not include the financial effects of activities in /or income from other sources.	COST-EFF	CLOSED	Agreed, this is the reason the term "ATSP" is used to highlight that only the ATC activity is analysed.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Reader's guide, paras 2.1.12	General remark	Clarification of the phrase "the deduction of 2013 other revenues that has already been billed to the users through the chargeable unit rate, "would be appreciated"	COST-EFF	CLOSED	The quoted part on its own is not meaningful. The whole sentence must be taken into account, which basically says that the "true cost for the users" include a part that has already been billed to users in 2013 (i.e. DUR – exempted VFR – other revenues) and also a part relating to 2013 activities but charged or reimbursed in future years.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Reader's guide, paras 2.1.12	General remark	The "true cost" concept is only a very theoretical concept, as it includes a.o. the inflation rate difference in 2013, which may be included only in the 2015 cost base.	COST-EFF	CLOSED	Noted.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	4	Pag 137 Application of the severity classification of the Risk Analysis Tool (RAT)	disagreement	PRB remarks that the Netherlands has confirmed that the AST data are correct. However these AST data are not in line/ have a broader scope than the data requested in the EU 691/2010 or stated in the FABEC Performance Plan 2012-2015. Furthermore the aggregation of the two tables (one for ATM Ground value and the other for ATM Overall value) included in the Netherlands performance monitoring report 2013 in one table gives the wrong impression that the ANSPs still don't use RAT, which is not the case. The figures are heavily influenced by the lack of state input. As stated in the NL State Report the ANSPs use RAT for almost 100%	SAF	Noted.	No change.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	5	Page 138, PRB's recommendation on capacity	General remark	Rather strange that PRB includes its own previous recommendation in its report and repeats it in a new recommendation without any reference to FABEC's follow up letter, in which FABEC clearly stated that a capacity target of 0.4 minute was unachievable in RP1. LVNL is planning and working towards the capacity numbers set out in the FABEC performance plan, not towards reference values or recommendations originating from other parties. The en-route delay targets for RP1 are: 2012 0.2 min/flight 2013 0.2 min/flight 2014 0.18 min/flight	CAP	OPEN	PRB referred to the Commission's recommendation, not a PRB recommendation.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	Page 139, Airport Performance Monitoring	General remark	The bandwidth (improvement only > 30%, deterioration only < -30%) is too large and does not encourage capacity improvements. By the way, "30" should be replaced by "30%".	CAP Apt	NOTED	Clarification provided as follows: 1 - performance improvement/degradation can result from absolute performance values only, and not relative. For instance, a reduction of ATFM delay from 4 minutes/departure to 3.4 minutes/departure (i.e. -36 second/departure) is certainly more significant from both the operational and statistical perspectives (given the 1-minute accuracy of raw data) than a

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																reduction from 0.2 to 0.1 minute/departure (i.e. -6 seconds), although in the 1 st case, this represents -15% only compared to -50% in the 2 nd case. 2 - The 30-second threshold to identify performance improvement/degradation can be re-discussed in the scope of the PRB Annual Monitoring Report 2014.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	6	Page 139, Airport Performance Monitoring	General remark	Critical issue LVNL has in cooperation with the other FABEC ANSPs looked closely at the material provided on the PRB dashboard. It gives an overview of the method and data used. However, the method calls for clustering certain parameters, for example gates. The clustering has a large impact on the result, but the way this clustering is done is not described in detail. This makes it impossible to replicate the results for the ANSPs. The FABEC ANSPs (including LVNL) have asked the PRB for more details specifically on this issue but have not yet received an answer. As long as these data is not available, ANSPs are not able to replicate the results and therefore not able to take corrective measures to influence this parameter in a desired direction.	CAP Apt	NOTED	Action taken by the PRU
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	7	Page 140	General remark	Although it is understood that only the main provider is mentioned we should also mentioned MUAC as the sole UAS ANSP in FIR The Netherlands; We should also avoid the wrong impression that all ATC costs in FIR The Netherlands are related only to LVNL. Parts of the costs bases of MUAC, Eurocontrol, KNMI and the Dutch NSA are all included in the en route and terminal cost bases in FIR The Netherlands. This should be mentioned.	COST-EFF	CLOSED	In item 1. "Contextual and economic information". Only the main ATSP of a given state it is mentioned just as informative purpose. In page 140 the En-route cost reflected are at state level From item 4 in the "En-route cost by entity at State level" chart it is clear that there are other entities and ANSPs included in the cost base besides LVNL.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	8	Page 140 and others	General remark	As all figures are expressed in € 2009 it is very difficult to compare PRB's findings with the nominal figures which are commonly used. It is appreciated if next to the figures in € 2009 also the nominal figures were presented.	COST-EFF	CLOSED	We need to have a common reference in order to make a valid comparative analysis, between the NPP plans and the actual figures. In our opinion the presentation of nominal figures besides the real term figures would make the analysis overly complicated and much harder to read.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	9	Page 142, item # 7, actual costs 2013 vs NPP item # 7	Factual mistake	Changes in social premiums laws are not mentioned here, although the financial effects are bigger than the new tax on higher incomes	COST-EFF	CLOSED	Noted. The text has been amended to reflect this additional piece of information.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	10	Page 142, item #7, Conclusion	General remark	After the substantial cost reduction in 2009/2010 it is very difficult for LVNL to reduce its costs at short notice.	COST-EFF	CLOSED	Noted.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	11	Page 144, item # 11, General conclusions on the Terminal ANS costs and unit rates monitoring	Factual mistake	Only LVNL's part of the en route (€ 44,07) and the terminal (€ 157,93), charges are frozen in the period 2012 – 2014. Other parts of the charges (MUAC, KNMI, Eurocontrol) were not frozen. The Netherlands has sought continuously to minimize increases in the charges.	COST-EFF	CLOSED	Noted. The text has been updated accordingly.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	1	Page 6, para 2.6.1	General remark	The Netherlands is not mentioned as one of the States which delivered all data on time.	CAPEX	CLOSED	Noted. See comment in item 3.19.1 and 3.19.2 (as not all data was provided). No action

Date	Country	Name of organisation or company	Last name	First Name	Job Title	Email address	Title of the Document commented	Version of the doc. commented	Date of issue of the doc. commented	# Comment	Chapter/Section/Para/bullet/etc in the document	Proposal for modification / addition	Rationale	Relevant for	Status	PRB position
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	2	Page 6, para 2.6.3	General remark	Maybe the States are only at the start of the learning curve in linking the CAPEX projects to the ATM Master Plan.	CAPEX	CLOSED	Remark noted No change to the report.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	3	Page 7, paras 2.6.8 - 2.6. 10	General remark	Relating CAPEX (financial flow) to costs (P&L item) seems a bit contestable by their different natures, the more so as the major part of CAPEX projects are financed by loans. Large CAPEX projects with a lead time of several years do not even have an impact on the RP2 costs, while the capital expenditures in RP2 are very substantial.	CAPEX	CLOSED	Noted. No action.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	4	Page 12, para 3.19.1	General remark	The Netherlands reports only by exception. In case a project is postponed it is indicated (for instance, it is indicated in the planning 2014 table that the implementation of the AAA replacement is postponed till 2019. If there is no change in the implementation date, no information is included in the table. In respect of the AAA-replacement there is no official date of operation due to the fact that there is still no decision for the replacement of the AAA-system (autumn/winter 2014) All the dates mentioned are planning dates.	CAPEX	CLOSED	Noted. No action.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	5	Page 12, para 3.19.5	General remark	Relating CAPEX (financial flow) to costs (P&L item) seems a bit contestable by their different natures, the more so as the major part of CAPEX projects are financed by loans. See also remark # 3	CAPEX	CLOSED	Noted. No action.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	6	Page14, para 3.19.14	General remark	Although it is maybe true that the projects mentioned do not belong to the revised PP and do not contribute to any OIs/enablers or ESSIP Objectives but it is part of the capital expenditure and necessary for providing ATC services. It would be appreciated if PRB would clarify this remark under the heading of capital expenditure.	CAPEX	CLOSED	Rationale accepted.
26 Sept 2014	The Netherlands	Ministry of Infrastructure and the Environment	van der Westen	Ad	Policy Advisor ATM	ad.vander.westen@minienm.nl	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	7	Page 14, para 3.19.16	General remark	See also remark # 4	CAPEX	CLOSED	Rationale given in the comment 4 accepted. Paragraph 3.19.16 to be deleted in the report.
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	1	Electronic page 14/ second table (RAT)	Factual	2013 RAT ATM Overall scores for SMIs and RIs should be 100%, not 0% (see submitted Monitoring Report).	SAF	Accepted.	Accepted – typo.
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	2	Electronic page 17/ Airport Performance Monitoring table	Factual	2013 Additional ASMA score for London Gatwick should be 2.8 (not 2.7)	CAP Apt	NOTED	The PRB takes note of the performance monitoring figures provided by the CAA. However, 1 – Only the figures available in the dashboard (version 30/04/2013) are considered in order to ensure independency of the monitoring process; 2 – the difference reported by the CAA has no impact on the national average. Action taken by the PRU in order to identify the reason for discrepancy.
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 2	3.0	12/09/2014	3	Electronic page 17/ Airport Performance Monitoring table	Factual	2013 Additional ASMA score for Birmingham should be 0.5 (not 0.6)	CAP Apt	NOTED	The PRB takes note of the performance monitoring figures provided by the CAA. However, 1 – Only the figures available in the dashboard (version 30/04/2013) are considered in order to ensure independency of the monitoring process; 2 – the difference reported by the CAA has no impact on the national average. Action taken by the PRU in order

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																to identify the reason for discrepancy.
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	4	Table 2 (para 2.9.8)	Typo	Typo in heading – 'planned' instead of 'planed'	CAPEX	CLOSED	Noted. Action: corrected.
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	5	Para 2.9.9	Typo	Typo in last line – 'spend' not 'spent'	CAPEX	CLOSED	Noted: Action: corrected
26 Sept 2014	UK	CAA	Zalewska	Anna	Policy Adviser Economic Regulation	Zalewska Anna <Anna.Zalewska@caa.co.uk >	PRB Annual monitoring report 2013 Volume 3	2.0	10/09/2014	6	Table 7 (para 3.29.9)	Factual	<p>Planned capex values for 2012-2014 are correct, however we cannot validate the updated plan capex values in 2009 prices.</p> <p>The CAA asked NATS to validate the capex figures. NATS analysed the numbers and concluded that the figures for 'updated plan' are correct for years 2013 and 2014 but incorrect for years 2010, 2011 and 2012 for the following reasons:</p> <ol style="list-style-type: none"> 2010 – the actual data used by the PRB (from the SEID 2010, Table F.7/Line F37 from NATS submission no. RO11812 (2010 PRU Revised)) is not like for like with the scope of years 2012 to 2014. It includes capital expenditure relating to airports (which needs to be removed) and uses an allocation basis which, amongst other things, excludes expenditure that benefits both military and civil customers (but which forms part of NERL's asset base, and needs to be added). A revised table (see Annex A) showing the 'like for like' values for lines B34 – B36 (i.e. the relevant Capex for the categories of Land and Buildings, Systems and Equipment, and Intangible Assets) has been created and is attached to this email. 2011 – the data used by the PRB (from the SEID 2011, Table F.7/Line F37 from NATS submission no. RO41913 (2011 PRU Revised)) needs a similar adjustment to the 2010 data (see Annex A). 2012 – the GBP value quoted of £118m is correct, but when we convert this to 2009 prices using the final actual deflator of 1.110, and to Euros at a rate of 0.8906, the value in Euros (2009 prices) should be €119m rather than €122m shown in the document. <p>The calculation of the 'Main' and 'Total' split for the 2010 and 2011 years seems to have been taken from the PRU revised tables described above, and these simply distinguish expenditure between 'Systems and Equipment' (taken by the PRB to be 'MAIN') and other spend. It is uncertain that this distinction is on the same basis as the MAIN / OTHER capex that is broken down in the reports for 2012 – 2014. Therefore the split may not be 'like for like' with the 2012 – 2014 data.</p>	CAPEX	CLOSED	<p>Noted.</p> <p>Fore 2010 and 2011 your request is accepted, but the conversion into Euros 2009 is different (2010 total GBP is 117 and for 2011 is 120) (see the report). As for 2012 the CAPEX actual amount is the same as in the 2012 Report (121.7M€2009).</p> <p>Action: report corrected.</p>

Reserved for PRB/PRU	To be filled by the consulted stakeholder
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