Targeted stakeholder consultation on the establishment of the "Pilot Common Project" supporting the implementation of the European Air Traffic Management Master Plan

Fields marked with \* are mandatory.

# 1 Questions to identify the organisation

The following questions help us build your profile as a respondent. In accordance with Regulation 45/2001, all personal data collected through this survey will be kept securely and will ultimately be destroyed.

1.2 What is your name?\*

Dutch government (coordinated national response )

#### 1.3 What is the name of your organisation?\*

Ministries of Transport and Defence

#### 1.4 Is your organisation registered in the European Transparency Register?

All organisations and self employed individuals, irrespective of their legal status, engaged in activities falling within the scope of the register are in principle expected to register. Your contribution will not be valid if your organisation is not registered while it should.\*

- Yes
- No

#### 1.6 What is your (main) position in your organisation?\*

National POC, Policy Advisor

- 1.7 To which group of stakeholders do you belong?\*
  - civil airspace users
  - civil air navigation service providers
  - civil airport operators
  - military
  - National Supervisory Authorities
  - Industry Consultation Body
  - ATM Sectoral social dialogue
  - The expert group on the social dimension of the Single European Sky
  - Network Manager
  - Other

1.9 Received contributions, together with the identity of the contributor, may be published on Directorate General for Mobility and Transport website, unless the contributor objects to publication of the personal data on the grounds that such publication would harm his or her legitimate interests. In this case the contribution may be published in anonymous form. Otherwise the contribution will not be published nor will, in principle, its content be taken into account

Do not publish my organisation data

## 2 ATM functionalities

## 2.1 Concerning each individual ATM functionality

- 2.1.1 I would like to comment further on the following ATM functionalities
  - AF 1: Extended AMAN and PBN in high density TMAs
  - AF 2: Airport Integration and Throughput Functionalities
  - AF 3: Flexible Airspace Management and Free Route
  - AF 4: Network Collaborative Management (Flow & NOP)
  - AF 5: iSWIM functionality
  - AF 6: Initial Trajectory Information Sharing

### 2.1.1 AF 1: Extended AMAN and PBN in high density TMAs

2.1.1.1 This ATM functionality and its operational and technical scope will become binding with the adoption of the PCP regulation and will serve as a main reference for the elaboration of the Deployment Programme and subsequent execution of implementation projects.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.1.2 If not, what information should be modified or which information is missing?

That military aircraft transiting through these TMAs will not be hampered. Elaborating the scope of the 180-200NM AMAN horizon, will this affect merely the existing route structure (SIDS and STARS) or a circle around the ARP? The scope of AF1 implies implementation of technologies and procedures that will rely on the integration of enhanced MET capabilities that must be explicitly defined.

2.1.1.3 One of the main characteristics of a Common Project is that it groups mature ATM functionalities that require a synchronised deployment.

Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part II of the consultation paper is the right choice to achieve the maximum of benefits in the proposed timeframe?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.1.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.

2.1.1.5 This ATM functionality shall be deployed by the impacted stakeholders identified in Part II of the consultation paper.

Is the identification of impacted stakeholders comprehensive and correct?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.1.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

AU (legacy aircraft): RNP capabilities. Also, MET service providers need to be incorporated in this list.

- 2.1.1.7 Are you among those impacted stakeholders?\*
  - Yes
  - No
- 2.1.1.8 The ATM functionalities shall be deployed by the deployment target dates specified for each ATM functionality, which will be binding. The specified deployment target dates will therefore represent a deadline by which the operational stakeholders have to implement the ATM functionality and operate it. Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.1.9 If not, please indicate why not.

Pending on PBN IR en ICAO PBN developments, delayed regulation and lack of alignment, might delay implementation. Arrival Managemen into Multiple Airports might be a problem.

2.1.1.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.1.11 What are, in your view, the major challenges involved in this synchronisation?

Establishment of global harmonised PBN regulation.

2.1.1.12 Do you agree that there are no essential pre-requisites identified for this ATM functionality?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.1.13 If not, what information is missing?

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Rational for the TDL capacity/integration is unclear and apparently not a pre-requisite (where available).
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2.1.1.14 Are the interdependencies identified for this ATM functionality comprehensive and

understandable?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.1.15 If not, what information shall be modified or which information is missing?

See 2.1.1.13

- 2.1.1.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.1.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.

2.1.1.18 The essential parameters of the cost-benefit analysis in Part V-Section 3 of the consultation paper give evidence of the positive cost-benefit analysis for each ATM functionality, which contributes to overall positive cost-benefit analysis for the whole PCP.

Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.1.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.

There is no profound military/GA cost assessment. Traffic forecast is assumed to be too positive.

2.1.1.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?

(e.g. at the level of your organisation or at the level of your FAB grouping, etc.)\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.1.21 If so, please provide your cost-benefit analysis.

### 2.1.2 AF 2: Airport Integration and Throughput Functionalities

2.1.2.1 This ATM functionality and its operational and technical scope will become binding with the adoption of the PCP regulation and will serve as a main reference for the elaboration of the Deployment Programme and subsequent execution of implementation projects.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- 🔘 No
- Not applicable / not concerned
- No opinion

2.1.2.2 If not, what information should be modified or which information is missing?

2.1.2.3 One of the main characteristics of a Common Project is that it groups mature ATM functionalities that require a synchronised deployment.

Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part II of the consultation paper is the right choice to achieve the maximum of benefits in the proposed timeframe?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.2.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.
- 2.1.2.5 This ATM functionality shall be deployed by the impacted stakeholders identified in Part II of the consultation paper.

Is the identification of impacted stakeholders comprehensive and correct?\*

- Yes
- 🔘 No
- Not applicable / not concerned
- No opinion

2.1.2.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

- 2.1.2.7 Are you among those impacted stakeholders?\*
  - Yes
  - No

- 2.1.2.8 The ATM functionalities shall be deployed by the deployment target dates specified for each ATM functionality, which will be binding. The specified deployment target dates will therefore represent a deadline by which the operational stakeholders have to implement the ATM functionality and operate it. Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.2.9 If not, please indicate why not.

Timeframe delivery standards and start deployment is critical

2.1.2.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.2.11 What are, in your view, the major challenges involved in this synchronisation?

The ambitious timeframe.

- 2.1.2.12 Are the prerequisites identified for this ATM functionality comprehensive and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion

2.1.2.13 If not, what information shall be modified or which information is missing?

2.1.2.14 Are the interdependencies identified for this ATM functionality comprehensive and understandable?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.2.15 If not, what information shall be modified or which information is missing?



- 2.1.2.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.2.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.
- 2.1.2.18 The essential parameters of the cost-benefit analysis in Part V-Section 3 of the consultation paper give evidence of the positive cost-benefit analysis for each ATM functionality, which contributes to overall positive cost-benefit analysis for the whole PCP.

Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.2.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.

There is no profound military/GA cost assessment. Traffic forecast is assumed to be too positive.

- 2.1.2.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?
  - (e.g. at the level of your organisation or at the level of your FAB grouping, etc.) \*
    - Yes
    - No
    - Not applicable / not concerned
    - No opinion

2.1.2.21 If so, please provide your cost-benefit analysis.

### 2.1.3 AF 3: Flexible Airspace Management and Free Route

2.1.3.1 This ATM functionality and its operational and technical scope will become binding with the adoption of the PCP regulation and will serve as a main reference for the elaboration of the Deployment Programme and subsequent execution of implementation projects.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.3.2 If not, what information should be modified or which information is missing?

2.1.3.3 One of the main characteristics of a Common Project is that it groups mature ATM functionalities that require a synchronised deployment.

Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part II of the consultation paper is the right choice to achieve the maximum of benefits in the proposed timeframe?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.3.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.

2.1.3.5 This ATM functionality shall be deployed by the impacted stakeholders identified in Part II of the consultation paper.

Is the identification of impacted stakeholders comprehensive and correct?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.3.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

- 2.1.3.7 Are you among those impacted stakeholders?\*
  - Yes
  - No

- 2.1.3.8 The ATM functionalities shall be deployed by the deployment target dates specified for each ATM functionality, which will be binding. The specified deployment target dates will therefore represent a deadline by which the operational stakeholders have to implement the ATM functionality and operate it. Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.3.9 If not, please indicate why not.
- 2.1.3.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.3.11 What are, in your view, the major challenges involved in this synchronisation?

Wide range of technical scope however also the opportunity to develop an interface (SESAR solution) for the already existing ASM tools.

- 2.1.3.12 Do you agree that there are no essential pre-requisites identified for this ATM functionality?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.3.13 If not, what information is missing?

TDL implementation and PBN regulation.

2.1.3.14 Are the interdependencies identified for this ATM functionality comprehensive and

understandable?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.3.15 If not, what information shall be modified or which information is missing?

Interdependent with AF 1 and 2.

2.1.3.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*

Yes

- No
- Not applicable / not concerned
- No opinion
- 2.1.3.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.
- 2.1.3.18 The essential parameters of the cost-benefit analysis in Part V-Section 3 of the consultation paper give evidence of the positive cost-benefit analysis for each ATM functionality, which contributes to overall positive cost-benefit analysis for the whole PCP.

Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.3.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.

There is no profound military/GA cost assessment. Traffic forecast is assumed to be too positive.

- 2.1.3.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?
  - (e.g. at the level of your organisation or at the level of your FAB grouping, etc.) \*
    - Yes
    - No
    - Not applicable / not concerned
    - No opinion

2.1.3.21 If so, please provide your cost-benefit analysis.

### 2.1.4 AF 4: Network Collaborative Management (Flow & NOP)

2.1.4.1 This ATM functionality and its operational and technical scope will become binding with the adoption of the PCP regulation and will serve as a main reference for the elaboration of the Deployment Programme and subsequent execution of implementation projects.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.4.2 If not, what information should be modified or which information is missing?

The items which have been raised by the EDA on this AF need to be addressed.

2.1.4.3 One of the main characteristics of a Common Project is that it groups mature ATM functionalities that require a synchronised deployment.

Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part II of the consultation paper is the right choice to achieve the maximum of benefits in the proposed timeframe?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.4.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.

2.1.4.5 This ATM functionality shall be deployed by the impacted stakeholders identified in Part II of the consultation paper.

Is the identification of impacted stakeholders comprehensive and correct?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.4.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

- 2.1.4.7 Are you among those impacted stakeholders?\*
  - Yes
  - No

- 2.1.4.8 The ATM functionalities shall be deployed by the deployment target dates specified for each ATM functionality, which will be binding. The specified deployment target dates will therefore represent a deadline by which the operational stakeholders have to implement the ATM functionality and operate it. Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.4.9 If not, please indicate why not.
- 2.1.4.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.4.11 What are, in your view, the major challenges involved in this synchronisation?

- 2.1.4.12 Do you agree that there are no essential pre-requisites identified for this ATM functionality?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.4.13 If not, what information is missing?

2.1.4.14 Are the interdependencies identified for this ATM functionality comprehensive and

understandable?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.4.15 If not, what information shall be modified or which information is missing?

- 2.1.4.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.4.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.
- 2.1.4.18 The essential parameters of the cost-benefit analysis in Part V-Section 3 of the consultation paper give evidence of the positive cost-benefit analysis for each ATM functionality, which contributes to overall positive cost-benefit analysis for the whole PCP.

Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.4.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.

- 2.1.4.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?
  - (e.g. at the level of your organisation or at the level of your FAB grouping, etc.)\*
    - Yes
    - No
    - Not applicable / not concerned
    - No opinion

2.1.4.21 If so, please provide your cost-benefit analysis.

### 2.1.5 AF 5: iSWIM functionality

2.1.5.1 This ATM functionality and its operational and technical scope will become binding orientation with the adoption of the PCP regulation and will serve as a main reference for the finalisation of the standardisation and industrialisation processes.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.1.5.2 If not, what information should be modified or which information is missing?

- 2.1.5.3 Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part III of the consultation paper is the right choice to achieve the maximum of benefits?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.5.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.
- 2.1.5.5 Is the identification of impacted stakeholders in Part III of the consultation paper comprehensive and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.5.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

- 2.1.5.7 Are you among those impacted stakeholders?\*
  - Yes
  - No
- 2.1.5.8 Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the indicative deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion

2.1.5.9 If not, please indicate why not.

2.1.5.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.5.11 What are, in your view, the major challenges involved in this synchronisation?

- 2.1.5.12 Are the prerequisites identified for this ATM functionality comprehensive and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion

2.1.5.13 If not, what information shall be modified or which information is missing?

- 2.1.5.14 Are the interdependencies identified for this ATM functionality comprehensive and understandable?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion

2.1.5.15 If not, what information shall be modified or which information is missing?

- 2.1.5.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.5.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.
- 2.1.5.18 Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*
  - Yes
  - 🔍 No
  - Not applicable / not concerned
  - No opinion
- 2.1.5.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.
- 2.1.5.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?
  - (e.g. at the level of your organisation or at the level of your FAB grouping, etc.)\*
    - Yes
    - No
    - Not applicable / not concerned
    - No opinion

2.1.5.21 If so, please provide your cost-benefit analysis.

- 2.1.5.22 Considering the difference in maturity between SWIM (yellow and blue) profiles in the tables in ATM functionality 5, would it be more adequate to implement them separately and, in particular, aim an earlier deployment for the yellow profile?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.5.23 Comments

See 2.2.2

2.1.5.24 Due to the complexity of this ATM functionality (in particular the blue profile), do you consider that deployment could be done in two phases?

In the first phase, the functionality would be deployed by a limited number of impacted stakeholders, followed by a refinement of the initial functionality.

In the second phase, after the refinement, the functionality would be deployed by remaining impacted stakeholders.\*

- Yes
- No
- Not applicable / not concerned
- No opinion

#### 2.1.5.25 Comments

### 2.1.6 AF 6: Initial Trajectory Information Sharing

2.1.6.1 This ATM functionality and its operational and technical scope will become binding orientation with the adoption of the PCP regulation and will serve as a main reference for the finalisation of the standardisation and industrialisation processes.

Bearing this in mind, is its description and operational and technical scope clear?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.6.2 If not, what information should be modified or which information is missing?

- 2.1.6.3 Do you think that synchronising deployment of this ATM functionality in the geographical scope as specified in Part III of the consultation paper is the right choice to achieve the maximum of benefits?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.6.4 If not, please indicate how the geographical scope of this ATM functionality should be modified and why.
- 2.1.6.5 Is the identification of impacted stakeholders in Part III of the consultation paper comprehensive and correct?\*
  - Yes
  - 🔘 No
  - Not applicable / not concerned
  - No opinion
- 2.1.6.6 If not, please clarify why not.

If, in your view, any stakeholders are missing, please specify them and explain why they should be included.

- 2.1.6.7 Are you among those impacted stakeholders?\*
  - Yes
  - No
- 2.1.6.8 Taking into account the risk of delays identified in Part V-Section 2 of the consultation paper, is the indicative deployment target date feasible for you?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.6.9 If not, please indicate why not.
- 2.1.6.10 Each ATM functionality identifies which operational stakeholders need to synchronise with each other and for what purpose.

In your view, does the text describe sufficiently all the aspects of the synchronisation that need to be taken in to account?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.6.11 What are, in your view, the major challenges involved in this synchronisation?

2.1.6.12 Are the prerequisites identified for this ATM functionality comprehensive and correct?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.6.13 If not, what information shall be modified or which information is missing?

2.1.6.14 Are the interdependencies identified for this ATM functionality comprehensive and

understandable?\*

- Yes
- No
- Not applicable / not concerned
- No opinion

2.1.6.15 If not, what information shall be modified or which information is missing?

- 2.1.6.16 Is the information on the standardisation and regulation for this ATM functionality in the Standardisation and regulation roadmap in Part V-Section 2 of the consultation paper complete and correct?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion
- 2.1.6.17 If not, please specify if there are other standards or regulations needed or, if in your view, some of the listed standards or regulations are not needed.
- 2.1.6.18 Based on your own assessment, are you confident in the costs-benefits analysis for this ATM functionality?\*
  - Yes
  - No
  - Not applicable / not concerned
  - No opinion

2.1.6.19 If not, indicate for which elements (assumptions, costs or benefits) it is not the case and provide your assessment.

- 2.1.6.20 In case you are impacted by this ATM functionality, have you performed a cost-benefit analysis at your level?
  - (e.g. at the level of your organisation or at the level of your FAB grouping, etc.)\*
    - Yes
    - No
    - Not applicable / not concerned
    - No opinion
- 2.1.6.21 If so, please provide your cost-benefit analysis.
- 2.1.6.22 Due to the complexity of this ATM functionality, do you consider that deployment could be done in two phases?

In the first phase, the functionality would be deployed by a limited number of impacted stakeholders, followed by a refinement of the initial functionality.

In the second phase, after the refinement, the functionality would be deployed by remaining impacted stakeholders.\*

- Yes
- No
- Not applicable / not concerned
- No opinion

#### 2.1.6.23 Comments

## 2.2 Concerning all ATM functionalities

2.2.1 Do you agree with the division of the 6 ATM functionalities into two groups: first group containing the ATM functionalities 1 to 4, which are considered mature and whose deployment will become mandatory with the adoption of the PCP Regulation; and the second group containing the ATM functionalities 5 and 6 which are not considered mature and which would only serve as "binding orientation" means that while deployment of these AFs will not become mandatory with the adoption of the PCP Regulation, these functionalities will need to be taken into account by the operational stakeholders, in particular when planning and performing validation and industrialisation activities and when planning future investments so that these functionalities reach the required level of maturity allowing their deployment by the indicative deployment target date specified in the PCP Regulation.

- Yes
- No
- Not applicable / not concerned
- No opinion

#### 2.2.2 Comments

The Dutch government is not able to judge whether the AFs 5 and 6 are required in order to implement AF 1-4. However, if aspects of AF 5 and 6 are required, these should be binding. Preferably these aspects are named in the scope of AF 1-4. This way a mixture of binding and binding oriented AFs creating unclear legislation will be prevented. Additionally, the Netherlands understands that AFs should be in this PCP in order to receive fund on these projects. Therefore, aspects that are not mature could be named in the regulation, but clear requirements when these aspects are mature for implementation and steps to be followed in the process, should be added.

2.2.3 In addition to your comments provided for each ATM functionality, do you have any additional comments on the cost-benefit analysis?

Essential is that all stakeholders are triggered to implement the PCP. Just legislation might not be sufficient. Clear insight in all individual cost-benefit analyses is needed, in order to see what stakeholders need a financial trigger. The CBA is based on 6 AFs. In case content of this changes, an adapted CBA is needed in order to have full insight in the effects per individual stakeholder.

2.2.4 Do you have any comments regarding the incentives for deployment of the PCP (including the CEF funding)?

Clear rules on how CEF funding will be distributed among the stakeholders is necessairy (criteria for distribution of the funding). The Netherlands proposes to use the funding in order to make individual cost-benefit analyses more interesting. But how will SESAR project not being part of the PCP being funded? From what part of the CEF funding will the Deployment Manager receive funding?

2.2.5 Do you have any comments regarding the establishment of the Deployment Manager as described in the Consultation paper?

The Netherlands judges SESAR of great importance for innovating the European air traffic management and essential for realising a Single European Sky. In order to deploy SESAR successfully, all operational stakeholders (including MET) playing a role in the implementation of the content of the Pilot Common Project (PCP), should be involved in the Deployment Manager. Additionally, all involved stakeholders should commit to the planning and implementation as described in the PCP. Without commitment it seems to be impossible to succeed in an essential harmonised implementation. A positive business case or other trigger should be for each stakeholder.

2.2.6 In order to reduce the future costs of the PCP, the Commission considers possibilities to encourage common procurement/joint implementation.

Do you agree with this approach?\*

- Yes
- No
- Not applicable / not concerned
- No opinion
- 2.2.7 Comments

All stakeholders are needed in order to make the implementation of SESAR successful.

# 3 Final comments

3.1 For the purpose of improving future consultations, do you have any comments regarding this consultation?

If there are aspects that may be improved, please specify which and provide your suggestions.

3.2 Do you have any additional comments on any of the aspects covered in the Consultation paper?