



12 July 2015

## **ADS-B - POSITION PAPER ON THE EVOLUTION OF THE SPI MANDATE**

Europe Air Sports represents some 650,000 sports and recreational pilots across the European ECAC area. The bulk of air sports and recreational activities are carried out according to VFR rules. Our members fly either on aircraft of their own or in flying clubs, but always at their own expense. For some activities (e.g. hang- and para-gliders, microlights) equipage with ADS-B is not even technically feasible.

### **Background**

This mandate, aimed at harmonizing the performance and the interoperability of surveillance all across Europe, is seen by EAS as a severe additional and unnecessary financial burden for its members - following SSR Mode S and VCS 8.33 mandates - which is not very convincing, at least in Western Europe, where the radar coverage is pretty comprehensive.

### **Why does the EU need ADS-B?**

ADS-B is deemed by EAS as a complementary surveillance means to provide surveillance in remote or mountainous areas without radar coverage. It has to be considered as a technology which will allow a multi-source surveillance, not as the successor of the PSR and SSR technologies.

As a result, Mode S transponders will continue to contribute to radar detection and surveillance service.

### **How far can we copy the US model?**

The FAA policies are often taken as a model for Europe. The FAA way for implementing ADS-B in USA should inspire the European Commission regarding the scope of the equipage mandate and the financial incentives.

We know that the FAA has a very ambitious objective concerning the modernisation of the surveillance means. ADS-B Out will be mandated generally where transponders are required today. But ADS-B In will offer traffic, weather and other information services directly in the cockpit, at no subscription cost.

And this effort is made acceptable for the US aircraft owners through the availability on the market of affordable ADS-B sets and through the NextGen GA Equipage Incentive Program.

### **Which SJU option does EAS prefer?**

The SESAR input to the SPI IR regulatory update presents a selection of six options, which have been discussed at the SPI Step 2 workshop in April 2015.

EAS's preferred regulatory option is Option 2 named "Maintain the existing mandate".

### **Summary**

EAS supports the current mandate established by regulation No 1207/2011 on the performance and the interoperability of surveillance for the single European sky, as amended.

Regarding GA, particularly recreational and air sports, the ADS-B Out mandate should only apply to GA aircraft when they fly IFR within controlled airspace. Extension of the current mandate beyond of that is strongly opposed and rejected by EAS on the basis of no safety case, proportionality, cost and differentiation.

Outside of mandatory IFR in controlled airspace, only voluntary equipage is acceptable.

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