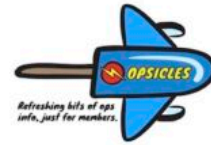# Do I need a TSA Waiver for a flight to the US?

David Mumford
25 September, 2024

If you're heading to the US and are trying to work out whether you need a TSA Waiver for your flight, we have an Opsicle to help with that.

The TSA Waiver Opsicle
It's not that complicated (but they try hard)

This is the original source of the TSA Waiver rules which for some reason is issued in the form of a NOTAM and with the clear aim of being as incomprehensible as possible. **Let's fix that!**

FDC 64255 ZZZ SPECIAL SECURITY INSTRUCTIONS FOR CIVIL 1) FILE AND ARE ON AN ACTIVE FLIGHT PLAN (IFR OR VFR); 2) ARE EQUIPPED WITH AN OPERATIONAL MODE C OR S TRANSPONDER, AND CONTINUOUSLY SQUAWK AN ATC ASSIGNED TRANSPONDER CODE; 3) MAINTAIN TWO-WAY COMMUNICATIONS WITH ATC; 4) AIRCRAFT NOT REGISTERED IN THE U.S. MUST OPERATE UNDER AN APPROVED TRANSPORTATION SECURITY ADMINISTRATION (TSA) AVIATION SECURITY PROGRAM OR IN ACCORDANCE WITH AN FAA/TSA AIRSPACE WAIVER; 5) ARE IN RECEIPT OF AND ARE OPERATING IN ACCORDANCE WITH AN FAA ROUTING AUTHORIZATION AND AN FAA/TSA AIRSPACE WAIVER IF THE AIRCRAFT IS REGISTERED IN A U.S. STATE DEPARTMENT-DESIGNATED SPECIAL INTEREST COUNTRY OR IS OPERATING WITH THE ICAO THREE LETTER DESIGNATOR OF A COMPANY IN A COUNTRY LISTED AS A U.S. STATE DEPARTMENT-DESIGNATED SPECIAL INTEREST COUNTRY, UNLESS THE OPERATOR HOLDS VALID FAA PART 129 OPERATIONS SPECIFICATIONS. FAA ROUTING AUTHORIZATION FOR OPERATIONS WITHIN U.S. TERRITORIAL AIRSPACE BY AIRCRAFT DESCRIBED IN THIS SUBPARAGRAPH C.5 WILL ONLY BE GRANTED FOR IFR OPERATIONS. VFR FLIGHT OPERATIONS ARE PROHIBITED WITHIN U.S. TERRITORIAL AIRSPACE FOR ANY AIRCRAFT REQUIRING AN FAA ROUTING AUTHORIZATION; AND 6) AIRCRAFT NOT REGISTERED IN THE U.S. WHEN CONDUCTING POST-MAINTENANCE, MANUFACTURER, PRODUCTION, OR ACCEPTANCE FLIGHT TEST OPERATIONS, MUST MEET ALL OF THE FOLLOWING REQUIREMENTS: A) A U.S. COMPANY MUST HAVE OPERATIONAL CONTROL OF THE AIRCRAFT; B) AN FAA-CERTIFICATED PILOT MUST SERVE AS PILOT IN COMMAND; C) ONLY CREWMEMBERS ARE PERMITTED ONBOARD THE AIRCRAFT; AND D) MAINTENANCE FLIGHT IS INCLUDED IN THE REMARKS SECTION OF THE FLIGHT PLAN. PART II. CIVIL AIRCRAFT OPERATIONS THAT TRANSIT U.S. TERRITORIAL AIRSPACE A. CIVIL AIRCRAFT, EXCEPT THOSE OPERATING IN ACCORDANCE WITH PARAGRAPHS B, C, D, OR E OF THIS PART II, ARE AUTHORIZED TO TRANSIT THE TERRITORIAL AIRSPACE OF THE U.S. IF IN COMPLIANCE WITH ALL OF THE FOLLOWING CONDITIONS: 1) FILE AND ARE ON AN ACTIVE FLIGHT PLAN (IFR OR DVFR); 2) ARE EQUIPPED WITH AN OPERATIONAL MODE C OR S TRANSPONDER AND CONTINUOUSLY SQUAWK AN ATC ASSIGNED TRANSPONDER CODE; 3) MAINTAIN TWO-WAY COMMUNICATIONS WITH ATC; 4) ARE OPERATING UNDER AN APPROVED TSA AVIATION SECURITY PROGRAM OR ARE OPERATING WITH AND IN ACCORDANCE WITH AN FAA/TSA AIRSPACE WAIVER, IF: (A) THE AIRCRAFT IS NOT REGISTERED IN THE U.S.; OR (B) THE AIRCRAFT IS REGISTERED IN THE U.S. AND ITS MAXIMUM TAKEOFF GROSS WEIGHT IS GREATER THAN 100,309 POUNDS (45,500 KGS); 5) ARE IN RECEIPT OF AND ARE OPERATING IN ACCORDANCE WITH AN FAA ROUTING AUTHORIZATION IF THE AIRCRAFT IS REGISTERED IN A U.S. STATE DEPARTMENT-DESIGNATED SPECIAL INTEREST COUNTRY OR IS OPERATING WITH THE ICAO THREE LETTER DESIGNATOR OF A COMPANY IN A COUNTRY LISTED AS A U.S. STATE DEPARTMENT-DESIGNATED SPECIAL INTEREST COUNTRY, UNLESS THE OPERATOR HOLDS VALID FAA PART 129 OPERATIONS SPECIFICATIONS. FAA ROUTING AUTHORIZATION FOR TRANSIT OF U.S. TERRITORIAL AIRSPACE BY AIRCRAFT SUBJECT TO THIS PART II, SUBPARAGRAPH A.5 WILL ONLY BE GRANTED FOR IFR OPERATIONS. DVFR AND VFR FLIGHT OPERATIONS ARE PROHIBITED FOR ANY AIRCRAFT TRANSITING U.S. TERRITORIAL AIRSPACE REQUIRING AN FAA ROUTING AUTHORIZATION. B. CIVIL AIRCRAFT REGISTERED IN CANADA OR MEXICO, AND ENGAGED IN OPERATIONS FOR THE PURPOSES OF AIR AMBULANCE, FIRE FIGHTING, LAW ENFORCEMENT, SEARCH AND RESCUE, OR EMERGENCY EVACUATION ARE AUTHORIZED TO TRANSIT U.S. TERRITORIAL AIRSPACE WITHIN 50 NM OF THEIR RESPECTIVE BORDERS WITH THE U.S., WITH OR WITHOUT AN ACTIVE FLIGHT PLAN, PROVIDED THEY

Break it down for me

The TSA want to know **who is coming to, or overflying the US,** for security reasons. If they are comfortable with your flight, you get a **TSA Waiver**. It takes 7 days to get one – on occasion, less.

Who needs one?

Foreign registered aircraft over 100K lbs making **2 or more stops** in the US need a TSA Waiver.

All **overflights** over 100K lbs need one - and that includes N-reg. If you are foreign registered and overflying, you need one regardless of size. One single exception: If overflying with an aircraft under 100K lbs registered in a **Portal Country*,** and the flight is from one of those countries, then you're good.
* Canada, Mexico, Bahamas, Bermuda, British Virgin Islands, and Cayman Islands.
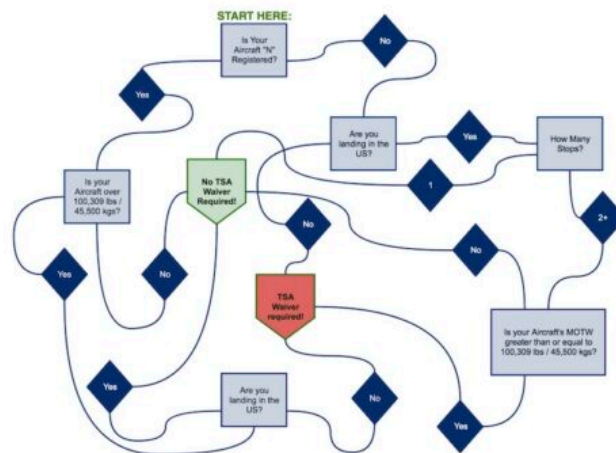
A few extra things...

You need to carry the **hard copy** onboard. It is only valid for **90 days.** Don't forget to include anyone **who may be onboard** when you file your initial request. You can file your request **here,** and get more info **here.**

Click to download PDF.

OPSGROUP members can download a copy for free here.

If you're not an OPSGROUP member, but you'd like to be, you can join here.

Let's start with the basics

Here is the TSA Waiver site. This is where you **submit your requests.**

And here is the TSA site on waivers. This is where you can **find info on Waivers.**

Which Waiver is Right for You?

There are a few types. You have your Disney Theme Park, Washington DC Special Flight Rules Area/Flight

Restricted Zone, Major Sporting Events and Special Events Waivers.

And then you have your International Waivers which include International Air Ambulance, No Transponder and **International Single Trip Waivers** – this last one is what we're interested in.
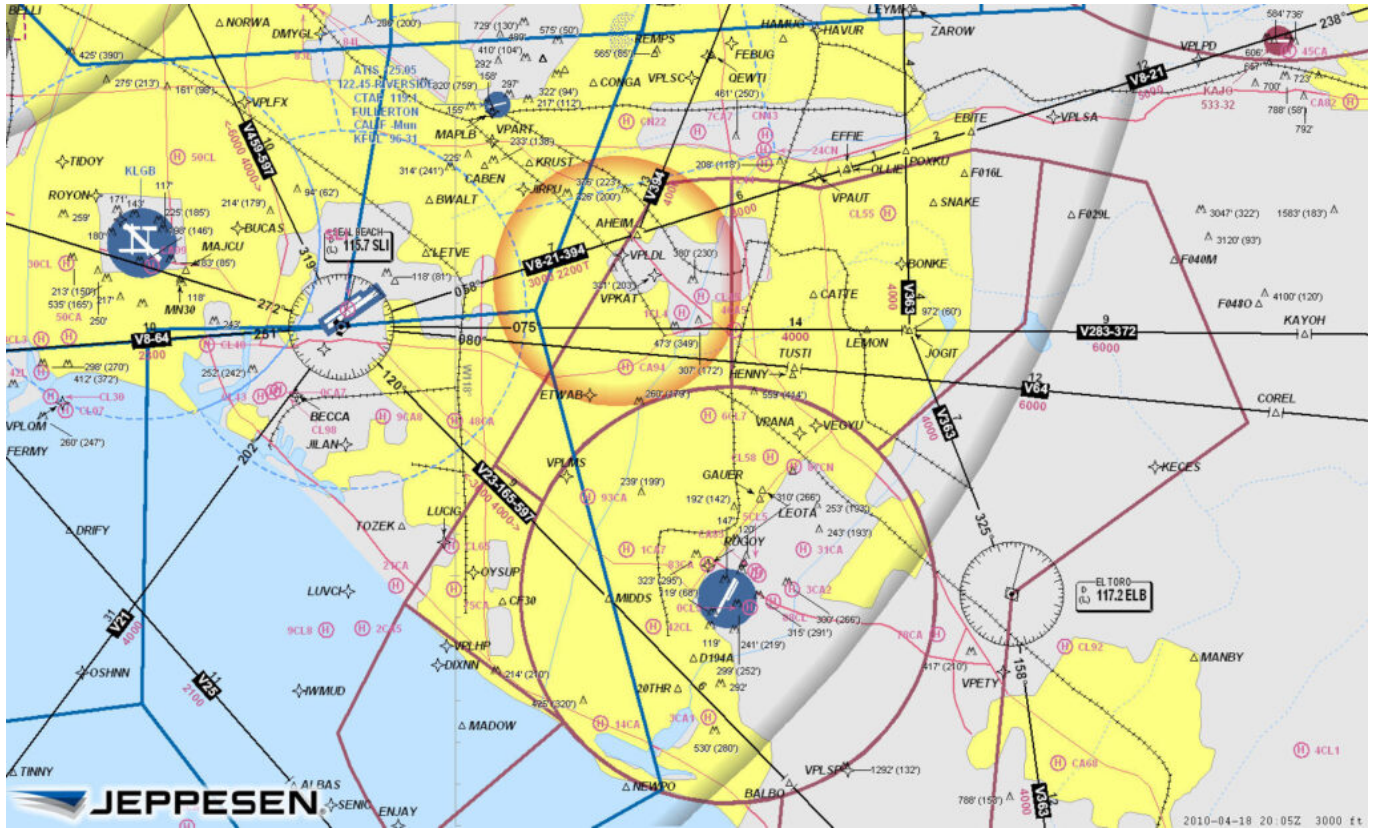
The Disney Zone

The Guidance

International Waivers are required for *'various aircraft to fly within US airspace, which includes the airspace above the United States and its territories'.*

Whether you need one depends on your **aircraft size, where it is registered and where you're coming from.**

Flying to and from the US

International TSA Waivers are not required for any aircraft arriving to or departing from the US or its territories. So this applies if you only make one stop in the US (i.e. you fly in and straight back out again).

Flying within US airspace

Planning to make more than one stop in the US? You'll need an International Waiver if you do this in a foreign registered aircraft which is heavier than 100,309 pounds MTOW (45,500 kg).

But, since most private aircraft generally fit under this weight limit, **you probably don't need one.**

Bombardier Global Expre... **92,500 lb**	Dassault Falcon 8X **73,000 lb**	Gulfstream G550 **91,000 lb**
Pilatus PC-24 **18,300 lb**	Gulfstream G500 **79,600 lb**	Bombardier Challenger 300 **38,850 lb**
Honda HA-420 HondaJet **10,600 lb**	Cessna Citation X **36,600 lb**	Embraer Legacy 600 **49,600 lb**

Most Bizjets are under the weight restriction.

Overflying the US

OK, here we go, the bit to know – this is for when you take off and land somewhere not in the US or its territories, and overfly the US in between.

If your aircraft weighs 100,309 lbs MTOW or more: you need a Waiver, even if your aircraft is US registered.

If your aircraft weighs less than 100,309 lbs MTOW: US registered aircraft do not need one. If you are foreign registered and overflying, you do need one – unless your aircraft is registered in a "Portal Country", and is flying directly from any one of these (prior to entering US airspace).

The Portal Countries:

- Canada
- Mexico
- Bahamas
- Bermuda
- Cayman Islands
- British Virgin Islands

Special Interest Countries

The black sheep of the World of Waivers. Probably the easiest category to work out the rules for. **You'll need an International Waiver for everything** – ops to, from, within and over the US, if your aircraft is registered in one of these countries. The list currently includes: **Cuba, Iran, North Korea, China, Russia, Sudan, and Syria.**

To recap...

Landings: Foreign registered aircraft over 100K lbs making 2 or more stops in the US need a Waiver.

Overflights: All overflights over 100K lbs need one – and that includes N-reg. If you are foreign registered and overflying, you need one regardless of size. There's one single exception: If overflying with an aircraft under 100K lbs registered in a Portal Country, and the flight is from any of those countries, then you're good.

Special Interest Countries: Aircraft registered in these need a Waiver for everything – ops to, from,

within and over the US.

Where is this officially written?

There were some official, permanent Notams published back in 2016. **FDC 6/4255 and FDC 6/4256 (KFDC A0006/15 and A0006/16).** These have vanished though and we can't find any replacements.

The best spot to read it (officially) seems to be in the AIM Chapter 5 *(Air Traffic Procedures)*, Section 6 *(National Security and Interception Procedures),* and take a look at 5-6-7 for the stuff on transiting US airspace.

How to get it and what to do with it.

You need to submit your request to the Authorization Office here. It is recommended that you submit your request **at least 7 days before** your planned flight to the US.

When you apply, don't forget to include all those who may be onboard in your request.

Once you have it, it is only **valid for 90 days.** You need to **carry the hard copy** onboard with you.

Any other things to know?

If you do operate over US airspace then you need to stick to their rules which also require that you:

- Use an active VFR or IFR flight plan
- Be equipped with a Mode C or S transponder and use an ATC-assigned transponder code
- Communicate clearly with ATC

Any other gotchas?

A couple, as reported by an OPSGROUP member:

Watch your weight: One in particular issue I have seen a few times is that of Private Global 7500s. Most owners of this aircraft are usually stepping up from a previous version like the Global 6000 series. Many fail to recognize that this step up has a significant impact on their US TSA requirements. I think most miss the weight class change and simply think of the aircraft as a Global XRS with better range. The implications of not having a valid waiver can be significant.

Validity period: A waiver can be valid for "up to 90 days" with the required dates being set during the initial application. A waiver may be modified up to three times with the end date being fixed (i.e. the end date on the original application must remain the same for each subsequent modification). There is a caveat I should mention regarding the number of allowed modifications, being that this is only valid within a calendar year.

Anything we missed?

Let us know, at team@ops.group

Hab Dich! German Ops Gotchas

David Mumford
25 September, 2024

OPSGROUP members have reported several strange things happening at airports in Germany recently. We asked the German Aviation Authority and a few local handling agents and FBOs, who confirmed these were not isolated incidents. So here's the lowdown on these latest German Ops Gotchas...

 #1: The Baggage Hold Gotcha

After a few back-and-forth emails with the German Aviation Authority *(LBA – Luftfahrt-Bundesamt, website here)*, the following is what applies.

If you are operating a **commercial flight** (i.e. Part 135) out of a German airport, and your aircraft has an inflight-accessible baggage hold, then **ALL baggage will be required to be screened and deemed cabin baggage**. Size isn't considered, so it could be a Citation or an Airbus 330.

This means that passengers won't be able to take any security-restricted items in their luggage. If they want to carry something sharp, or perhaps some hunting gear, then this would need to have some big lockable box.

You can apply for **approval to carry prohibited items** from the Ministry of the Interior BMI. The list of goods is here. However, LBA have said that it is not an exhaustive list, and the screener shall have the final judgement.

Bottom line, if you are flying most bizav aircraft out of a German airport and you have something that could be "dangerous", you are likely to have the item confiscated if screened correctly.

Possible solution: one member has reported that authorities accepted in their AOC to **install a wire-lock to the "impact-curtain"**, so it is not easy to access the compartment during flight.

 #2: Sneaky Security Checks

Jan 2025 update: We're now hearing that the LBA have started charging operators for these checks! One member reported receiving a 330 Euro invoice for a check that took place at EDDM/Munich. It seems that opting-out of these checks is not possible!

These are not ramp checks, they are "security checks" performed by LBA staff to see whether crew follow the right security procedures.

They basically try to enter the aircraft, and your job is to make sure you stop them. So man the doors! **Check their identity**, make sure they're wearing **the right ID cards**, and you will have passed the test. Another common thing is that they **leave a note behind the GPU hatch door** to check if you do the security check properly.

EDDS/Stuttgart is one of the top spots for this, but we've had reports of this happening at **EDDV/Hannover** and other airports in Germany too.

We asked LBA about this one too. They reference EU Implementing Regulation 2015/1998 which is all about *basic standards on aviation security*. We read it, and couldn't find anything in it warning flight crew to watch out for people in yellow jackets trying to trick them by switching their ID cards around and leaving weird notes on their aircraft.

So we don't like this one very much. Security is a team effort, and flight crew are a big part of this. Tricking them into compliance like schoolchildren isn't the way to go.

 #3 Fuel Payments

The simple rule we're all used to: **if you're a commercial flight, you don't pay tax on fuel.** So you fuel up, pay the bill, then if you're a commercial flight you get Customs to issue you a refund of the fuel tax.

Problem is, what's been happening more often recently is that **Customs have not been showing up to aircraft** – presumably due to lack of staff.

We also heard one recent case where Customs **refused to accept an AOC** of a commercial flight, and the operators had to pay the associated taxes with a private operation.

Possible solution: one of the local handlers recommends that operators make sure they **always carry the charter contract** for the flight on board, along with the AOC. And if Customs don't show up for the refund, you can **fill in a form** and apply after the flight. Here's a copy. Email it to: poststelle.hza-potsdam@zoll.bund.de

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Been to Germany recently and know any more Ops Gotchas to watch out for? Let us know.

Ops to Paris for the Olympics

David Mumford
25 September, 2024

Key Points

- **Paris will be busy from July 22 to Aug 11 (Olympics) and Aug 26 to Sep 8 (Paralympics).**

- **LFPB/Paris Le Bourget will likely be the airport you want to go to, but expect quick turns only with reposition elsewhere for parking (options below).**

- **There's a procedure to know about (slots, PPR, no late changes).**

- **Paris will be a no-fly zone on July 26 for the opening ceremony.**

France has published new AIC 13/24 (effective 27 June 2024) with procedures for operators to follow if they want to fly to a Paris airport during the Olympics. *It's essentially a corrected AIC, because the previous one had confusing advice for business aviation!*

Here's what bizav flights have to do

- You must **file a "flight intention" for each flight** (send this to your handler/FBO no later than 2 hours before take-off for flights to LFPB/Paris Le Bourget, or 4 hours for other airports).

- There's **no accreditation** for pilots or operators during the Olympics, and everything will proceed pretty much as normal. The AIC only applies to VFR flights.

- The airport authorities will implement **slots/PPR** from July 12 to Sep 16 (these are obtained by the handler and sent to the operator), so you just need to fill out the FPL with the airport slot ID in Field 18.

- LFPB/Le Bourget airport authorities will **not allow any updates with two hours prior arrival or departure** – no change of timing, no change of crew or pax. The handler will send this info to the authorities prior to the flight, and if they don't reply then the flight is approved. If there is any issue with the pax or crew, the handler will be notified, and the flight will be refused.

- It's going to be busy, so LFPB/Le Bourget will **only be accepting quick turns** with parking elsewhere.

- **If you get a slot, you best keep it** – if you cancel it there's no guarantee you're going to get another one.

- Check with your handler of choice about their fees cancellation policy, as some of these will be **non-refundable.**

At LFPB/Le Bourget you have a few options for handling:
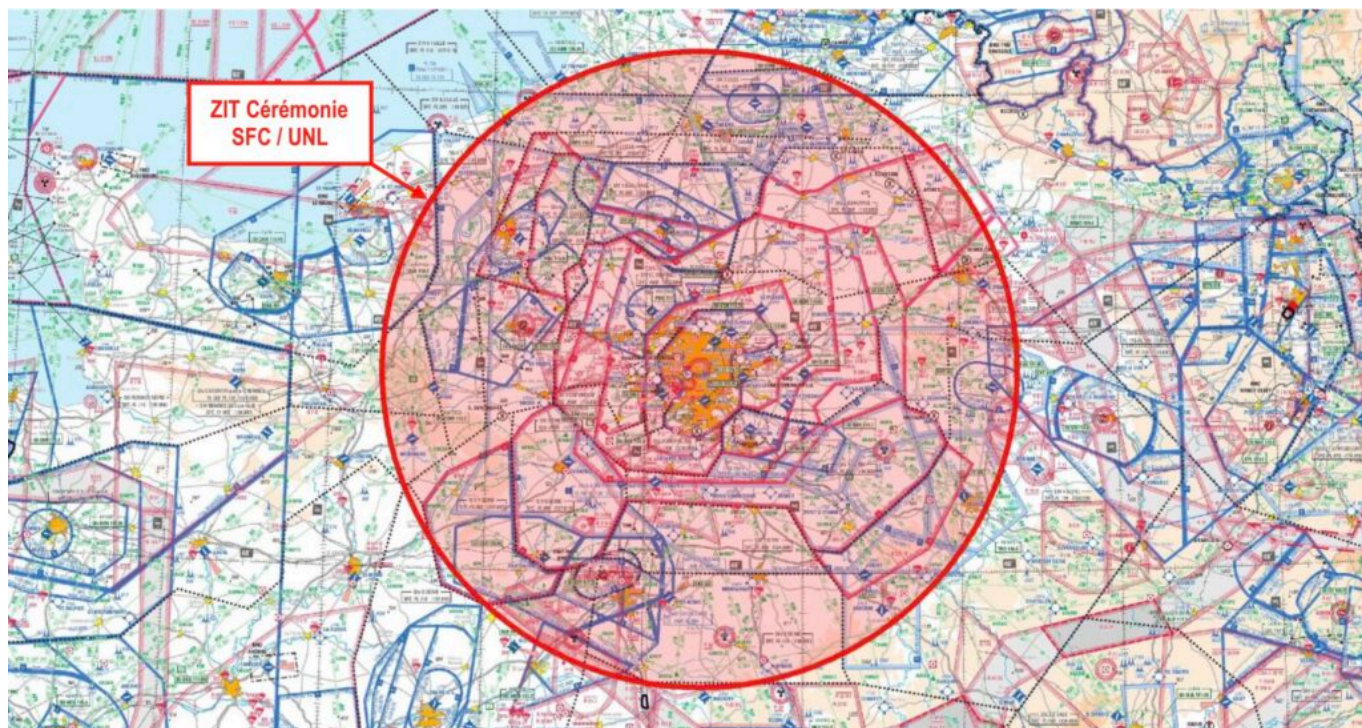
Astonsky – website
lfpb@astonsky.com

Dassault Falcon Service – website
handling@dassault-falcon.com

Jetex – website
fbo-lbg@jetex.com

Signature – website
lbgt1@signatureflight.fr

The Opening Ceremony

France has published a SUP showing the **closed airspace for the opening ceremony** of the Olympics in Paris on **July 26.**

On that day, between 1630-2200z, **Paris will basically become a no-fly zone** – no flights will be able to enter the airspace or go to/from the airports. Watch out for overflights too – these won't be allowed either!

Flight plans to Paris airports will be rejected starting 1530z. Departures from LFPG/Charles De Gaulle might be allowed starting 2130z with special approval.

Where to go?

LFPB/Paris Le Bourget, LFAQ/Albert, and LFOK/Vatry seem like the best bets.

LFPT/Pontoise and LFPM/Villaroche might be options too, but there's no customs available here, so these airports are only available for flights between EU/Schengen airports only (i.e. not direct from the likes of the US).

Ones to cross off your list

- **LFPO/Orly and LFPG/Charles De Gaulle** as they are dedicated to airline flights
- **LFOB/Beauvais and LFOP/Rouen** as they have no support for bizav flights.

Most operators are doing one of the following

1. **Drop and go:** Get a slot into LFPB/Le Bourget, fly in, drop off pax and then reposition elsewhere for parking. LFPM/Villaroche and LFPT/Pontoise are good options for this.

2. **Clear customs elsewhere:** Clear customs at some intermediate EU airport (somewhere like LFAT/Le Touquet or LFOP/Rouen), do fast turns for just customs, and then fly to either LFPT/Pontoise or LFPM/Villaroche for parking and pax can access Paris directly. This avoids the slot situation at LFPB/Le Bourget.

3. **Do everything elsewhere:** Use LFOK/Vatry (2:30 drive into Paris) or LFAQ/Albert (2:10 drive into Paris) directly, where there is customs, and avoid a positioning, but have a very long car journey into Paris.

4. **Avoid!** Just avoid the Olympics altogether. Go somewhere else for your holiday instead.

Tell me more about LFPM/Villaroche

Here's a report from local handler Elyxan Aviation: ops@elyxan-aviation.fr

LFPT/Pontoise does not have a customs facility and neither do we. This is frustrating as we are the two main Paris airports within a reasonable driving distance of the city centre.

LFPM/Villaroche is actually a good option as we have lots of parking and a modern FBO/with VIP lounge. We can offer 24/7 operations, which even LFPB/Le Bourget cannot. That the French authorities don't allow LFPT/Pontoise or LFPM/Villaroche customs and immigration is extremely unfortunate, especially as LFPB/Le Bourget is overloaded even normally in the summer.

LFPM/Villaroche is marginally closer to Paris than LFPT/Pontoise in real world times as we have better and closer motorway connections. We're 45-50 mins from the center and LFPT/Pontoise is 50-55 mins. In reality we are the best for South Paris, and LFPT/Pontoise and LFPB/Le Bourget are better for North. LFPM/Villaroche and LFPT/Pontoise are about equidistant for the Versailles region in real driving times. As the heliport is on the south side of Paris, we at LFPM/Villaroche are better situated for heli transfer into the city (10-15 mins from LFPM/Villaroche and 20-25 from LFPT/Pontoise).

LFPM/Villaroche is less well known, but a substantial airfield and a longer runway than LFPT/Pontoise. Sadly, the airport is managed by the French State and not the private company ADP that manages LFPB/Le Bourget and LFPT/Pontoise. Hence, the lamentable marketing of our airports capability and absolutely superb position.

You can download the brochure for the Elyxan Aviation FBO at LFPM/Villaroche here.

SAFA Ramp Checks: The Top 5 Offenders (+Alcohol test)

David Mumford
25 September, 2024

Highlights (updated 2024)

- **The Top 5 SAFA Ramp Check Findings are Flight Planning, Aircraft Documents, Defects, Charts, and Cabin Safety**

- **It's not a knowledge test, so feel free to say "I don't know"**

- **Alcohol testing is now common, see below for a guide**

Ramp check! Not our favourite couple of words in the aviation vernacular, but when your number's up,

wouldn't it be good to know **what things most of us are getting wrong**?

Well, here they all are, in a handy little guide. Download, print, attach to wall-of-your-choice, and enjoy.

What do we base this on? Well, something pretty special happened recently. The French DSAC partnered up with IS-BAO to take a look at **hundreds of de-identified ramp check findings** in order to analyse **the most frequent CAT 2 and CAT 3 findings in business aviation.**

This is "special" for three reasons

1. It's great that an aviation regulator has actually shared this info because **now we can see the top things we're getting wrong.**

2. If we can see the top things we're getting wrong, we can stop getting them wrong, and then **ramp checks become faster and more efficient for everyone.**

3. It's great that this specific aviation regulator happens to be the one from **France – because that's where a lot of ramp checks seem to occur!**

So, all good. IS-BAO published the results here, and it's worth giving that a read first before we press on…

The Top 5 Offenders

As the good folks from IS-BAO point out – EASA Ramp checks cover **52 inspection items** spread over 5 areas: **flight deck, cabin, aircraft condition, cargo, and general/other.**

But some of those 52 items generate more findings than others. The DSAC/IS-BAO study found that the **top inspection items by number of CAT2 and CAT3 findings for business aviation** were these ones:

1. Flight preparation (RI checklist item A13)
2. Mass and balance calculations (A14)
3. Manuals (A04)
4. MEL (A07)
5. Checklists (A05)
6. Defect notification and rectification (A23)
7. Navigation/instrument charts (A06)

So essentially, these findings all relate to five key areas: **Flight Planning, Documents, Defects, Charts, Cabin Safety.** Get these right, and your "sweatin over a ramp checkin" days are over, partner!

Have you been ramp checked recently?

Let us know! **Where did it happen? How did it go? What things surprised you?**

As always, we will de-identify anything you share with us before we tell anyone else about it. But we'd love to hear your stories, and other people will too! Our idea is to gather together as many of these stories as possible, and put them into a little book to **help give other pilots and operators an idea of what to expect.** So if you've got a story to share, send us an email at news@ops.group

In related news: the EASA RIM has been updated.

What's the EASA RIM? Europe's version of the Pacific Rim movie only with **ramp inspectors saving the aviation industry from danger?** Or just an updated version of a rather boring manual?

Sadly, just an updated manual.

EASA have made some amendments, corrections and added some other details to their **Ramp Inspection Manual**, so here is **our guide to their 131 pages of guidance** (and an Appendix).

What's up?

The Changes to the RIM are contained in a 131 page document here. So this is the doc that **crew** might want to read. (The massive doc that ramp inspectors use is called the Appendix – we'll get to that later).

The big stuff to look out for (that we could see) is stuff on **Alcohol testing** and they've changed the name of the **"Standard Report" to "Safety Report".**

Page 76.

Let's start with something small.

This isn't actually a change, but just something we think might be of particular use. It is the Checklist for on-the-job training for ramp inspectors. Basically, it is a long list of all the stuff they need to check. Which means it's **a long list you might want to check so you know what you are going to get checked on.**

Alcohol Testing.

Scroll to page 98 (section 10.3) and it lays out all the info on alcohol testing and how it should be carried out. There is a lot of info here (most of it for the inspecting agents rather than you) but still not uninteresting to read.

The general principles are that **it should be done somewhere private**, out of sight of anyone else, and if you aren't happy with the spot they pick then chose another.

They're testing to see if you blow **more than 0.2 grams of blood alcohol concentration**. If you blow below that then you pass. If you test above then don't panic straight out, **they must do a follow up confirmation test** which mustn't happen before 15 minutes, or outside of 30.

Certain drinks can mess up the results:

- "Aromatic beverages" like fruit juice *(never heard them called that)*
- Mouth sprays with alcohol content
- Medical juices (*I don't even want to know what that might be*)
- Burping on the test can create false positives.

Here is a particularly hideous flow chart of the entire process.
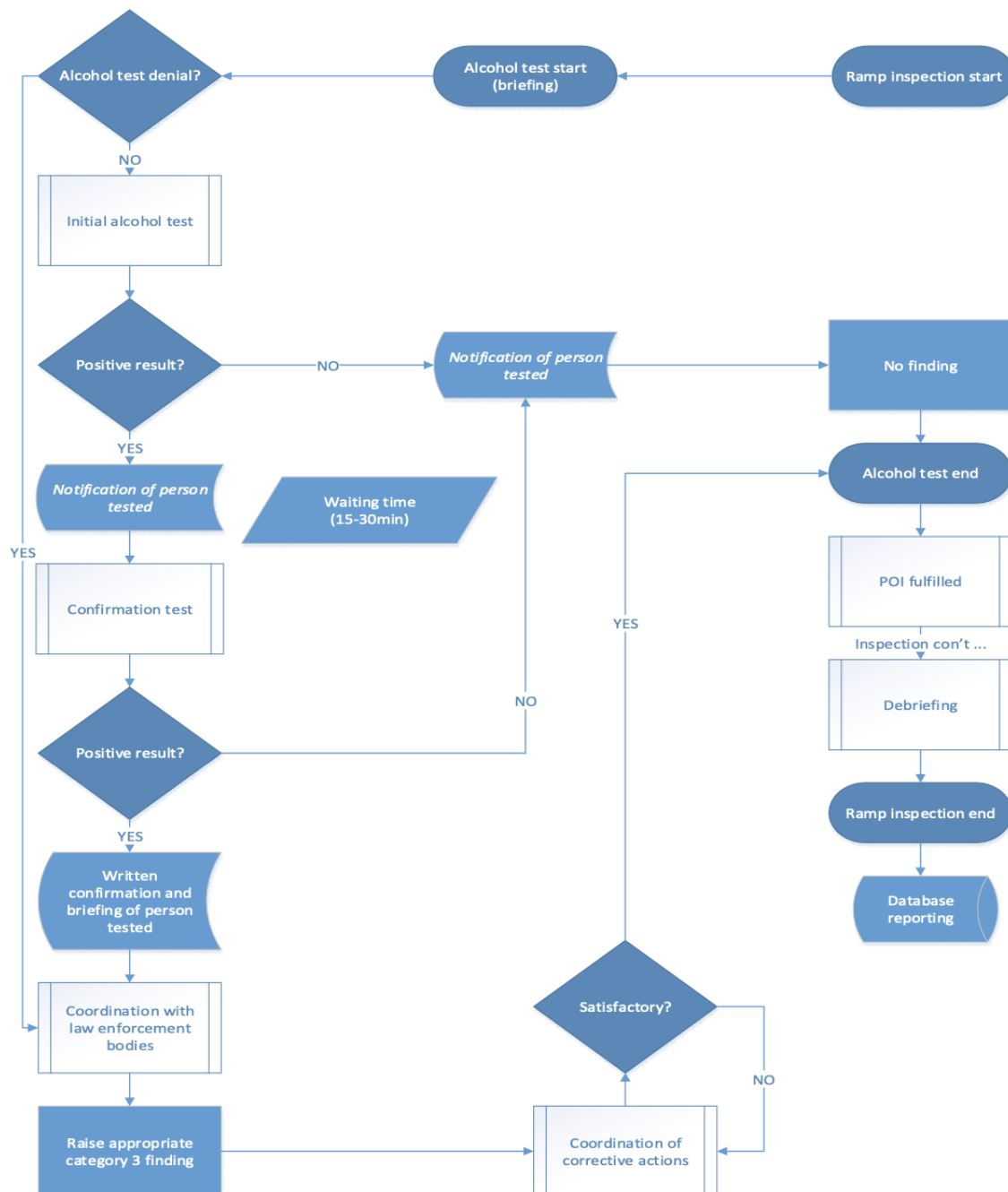
We think it's easier to sum up stuff like this:

1. **Don't ever go to work drunk.** Most operators/states specify a minimum time between drinking and working but if you aren't sure 12 hours is a generally decent one to work off.

2. Of course even **12 hours won't get you sober in time** if you've been on a mega bender the night before. So don't do that.

3. If you wake up before you're report time and realise you're drunk/potentially drunk then **CALL SICK!**

4. If you think a colleague is drunk, **stop them from going to the airport!** Report them if you need to.

5. If you are at work, and get picked for a random test, **make sure they do it correctly**, in a

private space following the right procedures.

6. **If you blow positive then don't panic** (unless you are drunk in which case do panic, you've messed up bad, partner). Have a think if you've maybe ingested something that could cause a false positive. Tell the inspector and wait for the confirmation test. They leave it at least 15 minutes, but don't push for more than 30.

Moving onto The Appendix.

The Appendix to the RIM is a whole 304 pages filed with **information on ramp check instructions and pre-described findings.**

Many of which have just been updated.

Now, you might be thinking *"why do I care how they're instructing their inspectors on stuff?".* But you should care because if you know how they're inspecting stuff, then it makes it a whole lot easier to not mess up on ramp checks and getting told off.

If you just want to scroll through **the list of changes**, then take a look here at the first 7 or so pages.

If you want a **full description** in standard EASA English, then read the whole 304.

If you want a **summary of the changes** then check this out.

Other useful stuff.

We wrote a whole post on ramp checks a while back and the stuff we wrote in that hasn't really changed that much.

While ensuring you are complaint is important, remember is works both ways. **Ramp Inspectors need to follow the rules and procedures as well.** Particularly when it comes to not delaying you or disrupting your duties too much.

The manual only recommends they must give you **8-10 minutes of quality quiet time** to set up for a flight. If you need more for safety reasons then tell them the time you need them to complete their checks by.

Final note.

Ramp checks can be frustrating. The best way to reduce that is make sure everything is in order and be prepared for them.

There are some airports we've heard are particularly *vigorous* with them:

- Anywhere in France
- Florence, Italy
- Edinburgh, Scotland
- London Heathrow
- Copenhagen, Denmark *(keen on the breath tests)*
- Amsterdam, Netherlands *(also keen on the breath tests)*

Let us know where you've experienced them so we can update the list!

NAT Clearance changes – a game! (V4)

David Mumford
25 September, 2024
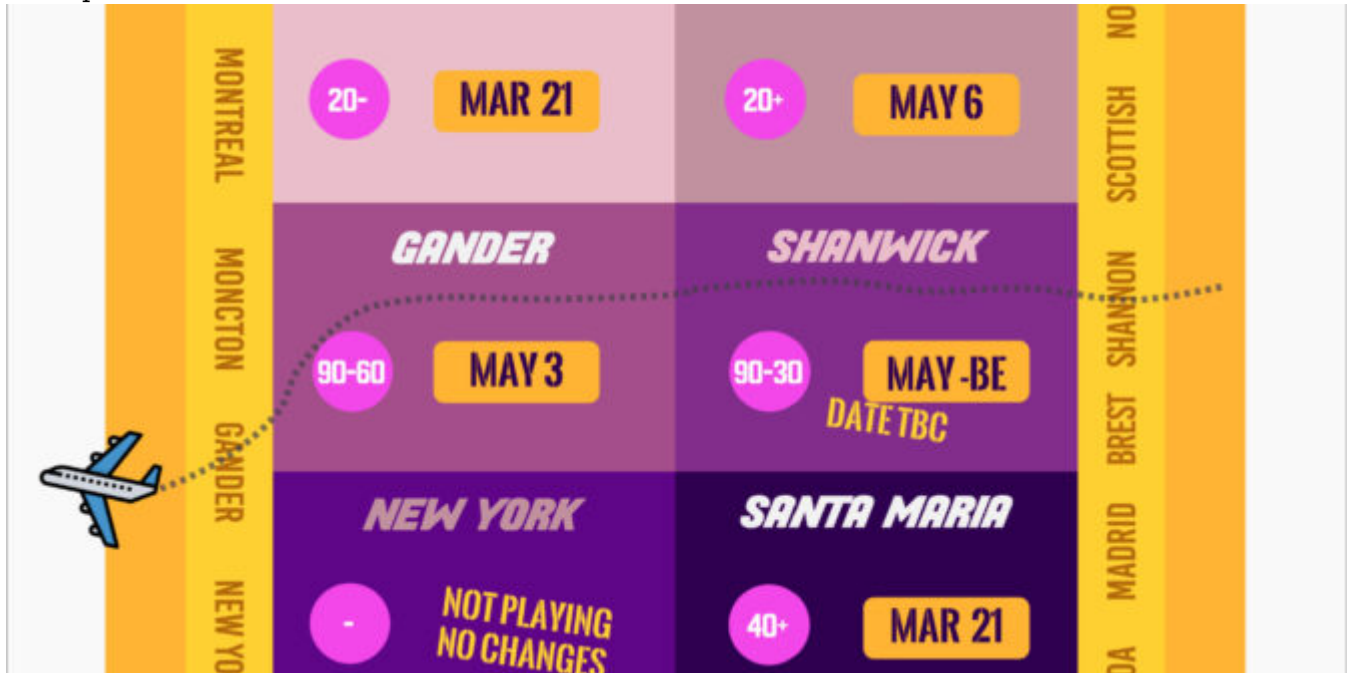
- **We've made a little game to help with Oceanic Clearances changes on the NAT.**

- **You can download it here.**

- **Updated June 19, 2024 – Edition 4!**

Why the game?

By **Christmas** of 2024, all OACC's on the NAT will stop transmitting an Oceanic Clearance to you. They still want you to send an "RCL" message, which used to mean "Request Clearance", but now it just means "Tell us your latest preferences". Think of it as Checking In.

There are different dates when Oceanic Clearances will cease to be issued in the following FIRs:

- **Shanwick**: ~~April 9~~ ~~May~~ ~~Q4 2024~~ **December 4**

- **Gander**: ~~March~~ ~~May 3~~ **December 4**

- **Bodø**: ~~March~~ ~~May 6~~ ~~June 17~~ **December 4**

- **Santa Maria**: completed March 21

- **Iceland**: completed March 21

But let there be no further blather about it here! We've done enough of that already – check here for our full post on the topic. **Just play the game – it's fun, and will tell you everything you need to know in 3 pages!** Print it out, share it, pin it on a wall somewhere if you so desire. We *do* so desire.

And if you have a question not covered in the game, send it to us at team@ops.group, and we'll help you out – and add it into the next version.

Edinburgh security rules create painful delays

David Mumford
25 September, 2024

Key Points

- **EGPH/Edinburgh airport has a rule that means all aircraft have to go through outbound security screening, regardless of weight or type of flight.**
- **Airport Spy reports suggest this can easily take an extra hour to complete, so plan for departure delays.**
- **If planning a trip to the region, consider EGPF/Glasgow instead!**

There's a rule in the UK that means outbound security screening is required for commercial flights over 10 tonnes MTOW, and all flights over 45.5 tonnes whether commercial or private.

But at **EGPH/Edinburgh**, outbound screening is required for <u>all</u> flights, regardless of weight or type of flight.

This means all crew and pax must pass through security, and abide by the 100ml liquid rule for carry-on

luggage.

A recent Airport Spy report says that this **whole process took around an hour**, and they were the only crew there at the time!

Another Airport Spy report says to consider using **EGPF/Glasgow** instead, where they just have the standard UK rules for screening, and also don't have arrival or departure slots.

The reason that EGPH/Edinburgh has this strange rule is something to do with it being a **"Critical Part" airport.**

What is a "Critical Part" airport?

Some folks we spoke to called this term *"Critical Park"*, others *"Critical Path",* but we think it's *"Critical Part"*.

Either way, there's nothing about it in the UK AIP or seemingly anywhere else online.

It's apparently something to do with how the *specific layout of the airport affects zoning for security purposes*.

And that's all we know.

Are there any other UK airports that do this?

Yes. **EGLL/Heathrow** and **EGKK/Gatwick** are both "Critical Part" airports, so both have the same rule: <u>all</u> outbound flights must have security screening here.

EGWU/Northolt is the only other airport in the UK that we know of which has mandatory outbound security screening for <u>all</u> outbound flights, but that's due to some kind of requirement in place from the military there, as the airport is a joint civil/military field.

We contacted a whole bunch of other airports (EGSS/Stansted, EGGW/Luton, EGMC/Southend, EGLC/London City, EGTK/Oxford, EGLF/Farnborough, EGKB/Biggin Hill), and they all said the same thing: no weird "Critical Part" stuff here – the normal UK rules apply.

So tell me the rules again?

EGPH/EGLL/EGKK/EGWU: Outbound screening is required for <u>all</u> flights, regardless of weight or type of flight.

All other UK airports: Outbound screening only required for commercial flights over 10 tonnes MTOW, and all flights over 45.5 tonnes whether commercial or private. You can read more about this here.

Mexico Permit Confusion – The Latest

David Mumford
25 September, 2024

Right on the heels of the implementation of the new **Single Entry Authorization**, known as an "AIU", the Mexican Civil Aviation authority (AFAC) has issued a new **Mandatory Circular** which is **causing issues at certain airports for BOTH Part 91 and Part 135 operations.** Here's the lowdown:

Issue #1: **Private flights might get mis-identified as Commercial flights.** The Circular claims that the "majority" of non-mexican registered aircraft indicate the type of service they are authorized to perform in their Registration or Airworthiness Certificates. Mexican registered aircraft identify their intended use through their tail number XA-Commercial, XB-Private, XC-Government. However, this claim in the circular could lead to an incorrect interpretation of Standard Airworthiness Certificates in the commuter, or transport categories to be an indication of the type of operation being performed. With this incorrect interpretation, a Private operation could be mis-interpreted to be a Commercial operation.

Issue #2: **You need a noise certificate to get a landing permit.** The minimum documents required now include a noise certificate. While required under 14 CFR 91.703 (a) (5) many pilots and operators do not know where to find it. In turboprop and turbojet aircraft, it is usually in the AFM. Smaller aircraft may need to create their own using the FAA Circulars AC 91-86 and AC_36-1H

Issue #3: **You also need a Journey Logbook.** An aircraft Journey Logbook is indicated as a required document. The aeroplane journey log should contain aeroplane nationality and registration, dates of flights, crew member names and duty assignments, departure and arrival points and times, purpose of flight, observations regarding the flight, signature of the pilot-in-command.

Issue #4: **You also need Radio Station Licenses.** Radio Station Licenses are now specifically required. While required under US law, many pilots/operators have chosen to ignore this and could be in for a harsh surprise.

Issue #5: **Watch out for cabotage rules.** Charter flights can only extract from Mexico those passengers that they brought in and cannot make any flights from one Mexican airport another.

Issue #6: **You *might* need Mexican insurance for private flights.** The circular states that the insurance policy for all aircraft must be a Mexican approved policy. It does not indicate that for private aircraft, the policies issued in their country of registry are accepted. This may be interpreted that ALL aircraft must now buy Mexican policies. ***More news to follow!***

Issue #7: **You *might* need a copy of the Mexican AIP.** The circular states that the Aeronautical Information Publication (AIP) must be carried aboard in physical or electronic form. In the past, an

equivalent document (Jeppesen Trip Kit) was accepted in lieu of the AIP. ***More news to follow!***

`Issue #8:` **You *might* need a review of your AOC.** The circular states that for charter/freight/ambulance flights, a Mexican AOC must be obtained. There is no guidance on whether this is simply a review of the existing AOC of the operator or they actually want operators to undergo some new procedure to obtain a Mexican AOC. ***More news to follow!***

The circular is sufficiently ambiguous and referring to numerous articles and sections of Mexican laws and Circulars that it will require a lot of homework to understand. As such, **much appears to be left to interpretation** which will most likely go against a pilot rather than to their benefit.

We recommend that you **contact the civil aviation authorities at the Mexican airport of your intended arrival** to determine what they are going to require of you.

If you are a Part 135 charter operator AND even if you have a blanket Mexican Charter Permit, you should **contact your handler immediately** to determine whether you will be allowed to operate at your intended Mexican airport of landing. We were informed that over the past weekend, **well over a dozen charter flights were denied entry** as a result of this Mandatory Circular.

Unfortunately, this Mandatory Circular is sufficiently vague that it is being **handled differently airport to airport.** However, we are receiving reports of charter flights being denied entry into Mexico at huge cost to all involved. We have not heard any reports yet regarding Part 91 but the ambiguity in this Circular leaves that door open as well. Just **check in advance** to avoid unpleasant surprises on arrival in Mexico.

Thanks to Rick Gardner of CST Flight Services for this article. CST Flight Services provides a wide range of international trip support services in Mexico and beyond. You can contact them for more info at: customersvc@cstflightservices.com

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OPSGROUP is hiring: Writer wanted

David Mumford
25 September, 2024

OPSGROUP is hiring. We're looking for a Writer – someone to help write some articles and interview some people.

What are we looking for?

- Someone with great energy! The most important thing is that you enjoy working with us, and we with you.

- **Writing experience**! The ability to tell good stories, and bring a sense of humour.

- *Experience in international flight operations is a bonus – pointy end, on the ground, dispatcher, flight planner, trip specialist – all good.*

What will you do?

- Write helpful, clear articles in plain, human-friendly English.

- Listen to members! Set up interviews with members to get their stories.

- Communicate with CAA's, FBO's, ATC, Airports to get the lowdown on the latest risks and changes.

- Research larger operational risks and changes.

- Interview pilots, dispatchers, and other ops people to get a story straight

About the role:

- Working hours: Weekdays, daytime hours, preferably based in the Americas (North or South) or Euro timezones, but flexible.

- Payment: Monthly, fixed-rate, 20 hours or so of work a week. Some weeks more, some weeks less – depends what's going on.

- Location: Anywhere you like!

What is OPSGROUP?

OPSGROUP is a membership organisation of Pilots, Air Traffic Controllers, Flight Dispatchers, Ops Managers and other dedicated people that realise that sharing information on dangers and changers is what keeps us all safe. We come together to make aviation more human-friendly for all of us.

How to apply?

You can do your first interview already! It'll take about 10 minutes, we'll take you on a little adventure, ask you some things, tell you some things. All you need is your big computer (couple of practical things to do, so your phone isn't ideal) and a little time.

Ready? Go … (or open in a new window)

Caribbean: File Your Flight Plans Early!

David Mumford
25 September, 2024
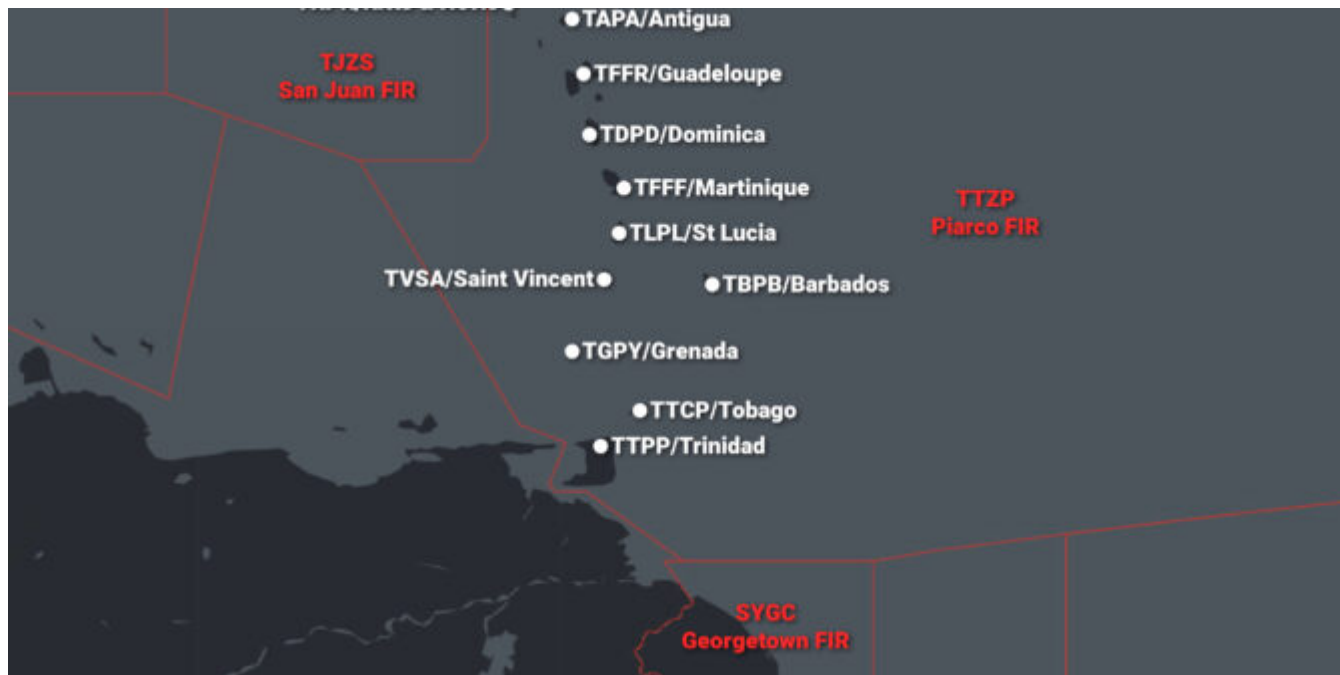
The Cricket T20 World Cup is taking place at various spots in the USA and West Indies throughout June.

From May 20 to July 15, if you want to operate a flight to any airports within the TTZP/Piarco or SYGC/Georgetown FIRs, they want you to **submit your flight schedule to the authorities 72hrs before departure.**

So that's basically **every airport in the island chain** from TKPK/St Kitts & Nevis in the north down to SYCJ/Georgetown in the south.
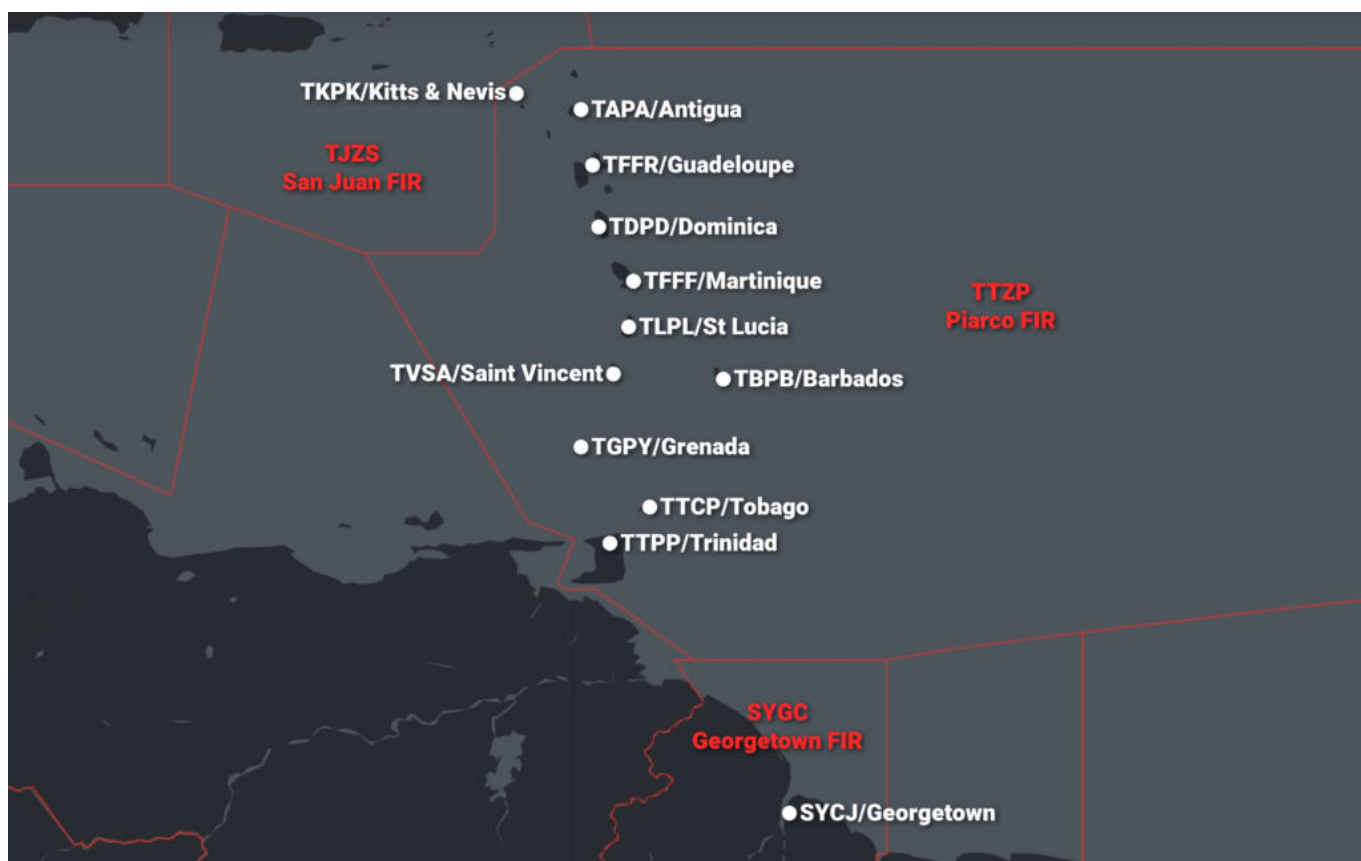
Check AIC 1-24 for details of how this is going to work. But essentially, if you're heading to any of these airports, send an email to piarcoatfmu@caa.gov.tt 72hrs before departure telling them the following info:

(a) Aircraft call sign
(b) Aircraft type
(c) Point of departure
(d) Date of flight
(e) Estimated Time of Departure (ETD)
(f) Destination
(g) Estimated Time of Arrival (ETA) for arrivals to airports within the Piarco (TTZP) FIR and airports within the Georgetown (SYGC) FIR
(h) Estimated Elapse Time (EET) for Piarco FIR
(i) Route
(j) Flight Level (FL) requested.

They also want you to **file your flight plan early**, to avoid delays. **4hrs prior to departure** should do the trick.

They're also warning of **extra delays in the TJZS/San Juan FIR** to the north.

For updates, keep an eye on the Cadena website.

France Wants Your Cash

David Mumford
25 September, 2024

Key Points

- **You must make a customs declaration when entering or leaving the EU with €10,000 or more in cash or its equivalent in other currencies – this rule has been around forever.**

- **But watch out for this gotcha in** <u>France</u> **– if you're planning on bringing in cash over this threshold and leaving it on the aircraft, you need to** <u>declare it in advance</u>**, or else you might get fined.**

- **Both reports we have received relate to LFPB/Paris Le Bourget airport. It's not yet clear whether this issue is just limited to this airport, or affects other airports in France.**

OPSGROUP member report

On arrival at **LFPB/Paris Le Bourget** recently, we were met by a team of customs officials who **asked us if we carried aircraft cash on board.** We were told that we should have declared any amount over €10,000.

As we had not attempted to take any cash into the country we asked if we could file at that time. The answer was that we have to file before departure online and that failure to do so was counted as attempting to bring in undeclared cash from outside of the EU. **Unaccompanied cash must be declared online before entry and before departure.**

There is no limit to the amount of cash that you can declare, and once declared any amount can be taken into the country and spent. I would imagine that there may be a requirement to account for any difference between the amount declared inbound and the amount declared outbound, but have not tested this.

We were fined a substantial sum, put on a EU watchlist for 5 years and told that any repeat violations will be subject to a sliding scale of sanctions up to complete confiscation of the funds. We have flown in the area for many years, but have never been notified of the this rule.

ANOTHER member report

*We had Customs officials board our aircraft in **LFPB/Paris Le Bourget** for a "routine pre-departure check" and they were **exclusively focused on declared/undeclared cash.***

*We had not declared (we were not carrying anything close to the qualifying amounts of cash), so they **asked questions about our onboard safe.** They knew most Global models had one, and they knew exactly where it was. We never use it, so we didn't even take the key on the trip and were unable to open it for inspection.*

*That made them suspicious, so we were delayed 20 minutes while they phoned supervisors to **decide if we were grounded or not.** They even discussed bringing in a team to **physically break into the safe** to verify contents, but supervisors decided to forego that option.*

*They cautioned us to have the key with us next time we entered France. **Needless to say, it is onboard now.***

Bottom line: *They know about safes and want to inspect their contents. Be able to open it.*

What are the rules?

These are all in EU Regulation 2018/1672, which got updated in 2021, and are basically as follows:

1. You must lodge a cash declaration to customs when entering or leaving the EU with €10,000 or more in cash or its equivalent in other currencies (banknotes, coins, cheques, traveller cheques, promissory notes, money orders without a named beneficiary, and all manner of gold coins/bars/nuggets etc).

2. If customs think you're bringing in cash over this threshold in any kind of "unaccompanied way" they can tell you to lodge a "disclosure declaration" – which you have to have to then do within 30 days.

So, nothing about having to tell them in advance.

Even on the French customs website, there's **no mention of having to declare or disclose anything in advance.** It says you either do it on arrival, or use their DALIA website to declare it online.

Where and when to file your declaration

A declaration can be submitted by the person transporting the funds:

- To French Customs, **at the time of entry into or exit from French territory**
- Online, via **DALIA**, the online declaration service, **at the soonest 30 days before the transfer date and at the latest before crossing the border.** To do so, you must create a user account on douane.gouv.fr.

How to make the declaration?

As of 2021, there's now a standard form that the EU have published for this.

This is available in other languages, if you're headed somewhere in the EU and they want a copy in something other than English.

Why the weird rule in France about having to do it in advance?

As far as we can tell, it's an incorrect reading and application of the EU Regulation.

Both reports we have received relate to **LFPB/Paris Le Bourget airport.** It's not yet clear whether this issue is just limited to this airport, or affects other airports in France. If you have experienced similar at LFPB or other airports in the country, please let us know: news@ops.group.

We did reach out to some local agents at LFPB, one of whom told us that from their understanding the principle is to do the declaration online before arrival, or if you are already on ground – go spontaneously to the customs advising that you have something to declare before they make any check!

US Domestic Enroute CPDLC Update

David Mumford
25 September, 2024

Key Points

- **Domestic en-route CPDLC in the US is now available to everyone – the Notam limiting GA/BA participation to approved trial participants has been removed.**

- **To get CPDLC, you've got to have the right avionics and submit a form – the FAA has published a list of aircraft types, which you will need to check to see if you comply.**

Here's a very brief summary. For the full, untarnished info, head to the dedicated FAA site here.

So for a long time, domestic en-route CPDLC in the US was only available to operators of bizav aircraft who were signed up to the FAA trial. That trial has now ended, and as long as your avionics make the grade, you can now make use of this service.

The FAA has published a list with a whole bunch of aircraft types on it.

If your aircraft is highlighted in **yellow** or **green**, you **can get datalink** (as long as you complete and submit the participation form).

If it's highlighted in **red** (or not on the list at all), you **can't get datalink.**

L3Harris have provided this guidance:

- *Ensure that your avionics are configured to use VDL Mode 2 as the primary media for U.S. Domestic En Route CPDLC. VDLM2 is the only approved media for participation in the domestic U.S.*

- *Ensure that both the 'J4' code in the field 10a equipment field as well as the FANSE (e.g. '1FANSE2PDC') DAT Code in field 18 (other information/DAT) are both included on the flight plan to indicate eligibility for U.S. Domestic En Route CPDLC (see the US Domestic Flight and Planning Guide for more information).*

- *Verify that VHF3/COM3 is set to DATA.*

- *The aircraft registration/tail in field 18 (other information/REG).*

- *If you are still researching your avionics in response to questions from L3Harris, please continue to file for CPDLC-DCL only (FANS) until your verification of eligibility is complete.*

Also, a member has reported that if you're now eligible but tried to log on in the past when you were not eligible, **your aircraft reg might have been placed on a "blocked list".** To get off this list, you need to contact L3Harris, who will forward to the FAA to ask to unblock you (should take less than 24hrs).

Where is CPDLC available in the US?

L3Harris published this updated map on 3 June 2024:
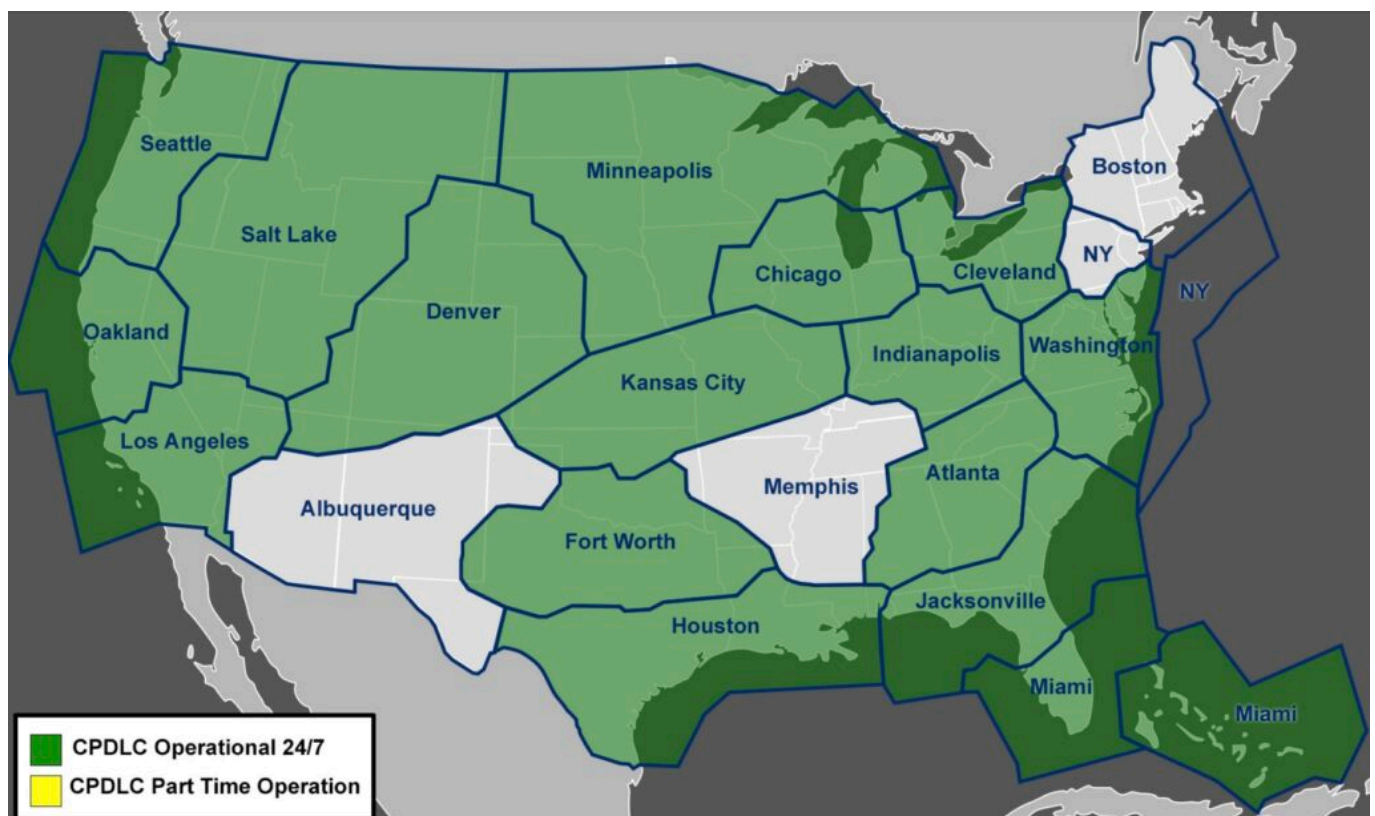
Come on, Albuquerque and Memphis!

So do I need CPDLC now?

No. US domestic datalink is not mandated.

What if I'm flying into the US internationally?

L3Harris have published a guide answering this very question. You can access it here:

For those of you who aren't so familiar with the US, **KUSA is the CPDLC logon code** – and that is the one and only logon code you need, all the way across.

Philippines: Down The Permit Rabbit Hole

David Mumford
25 September, 2024

Key Points

- **Charter/Non-Sched/Pt135 landings in the Philippines need a Foreign Air Operator Certificate (FAOC).**

- **It's a bit of a pain to get one. Takes 2-3 weeks, but local agents can help get a landing permit while the FAOC is in process.**

- **Read below for the latest on all Philippines Permits**

A Cautionary Tale

An OPSGROUP member recently reported the following:

- *To operate non-scheduled air services into the Philippines we were told that we need a **Foreign Air Operators Certificate.***
- *We were also asked to supply an **ICAO Airline Three letter code.** This is not something as a non-scheduled operator that we believe we can get!*
- *We used a local agent as our Third Party. They supplied the FAOC application form.*
- *We were successful in getting a **one-off permit**, however we still had to complete everything in the application form.*
- *We haven't determined if what we have submitted now as a one-off will be sufficient for the entire FAOC application – we'll find out soon…*

The Application Form

You can download it here:

What are the Philippines Permit Requirements?

Here's some **utterly useless official stuff** to "help" start you on your journey.

The Philippines AIP

Requires a log-in. Don't have one, and can't get one. Website doesn't even load most days.

I sent them an email and got a reply saying that even if you have a login, the site *doesn't actually have the eAIP on it.* But if you would like to pay them $324 USD each year, they can send you a hard copy.

Nope.

Philippines CAA Website

Searched for "eAIP". Nothing found. Moved on.

GEN 1.2

Backdoor access achieved via the EAD website! We have found the elusive AIP GEN 1.2!

But wait… it's dated 2011, and is an enraging mix of INCORRECT INFO and NOTHINGY PAP.

The quest continues…

Ask An Expert

We asked Jeff at Airmach Aviation for help – a local agent in the Philippines who knows **all the answers:**

- **All flights need a permit.** Landings, overflights, private, charter, scheduled, weird non-standard airworthiness… whatever you're doing, if you enter Philippines airspace, you need a permit.
- You'll want to use an agent here, as **Navigation Fees** and **CAA fees** must be paid prior to getting any permit.
- Permit approvals take anywhere between **48-72 hours.**
- They require the routing you'll use to calculate the **navigation fees.**

- **Permit fees** can add up, especially for Charter flights as there are different permits you need to get – one from CAAP (the CAA) and another from CAB (Civil Aeronautics Board).

- Scheduled and Charter landings will need a **Foreign Air Operator Certificate.**

OPSGROUP members can access all this info via the **Permit Helper** app on the Dashboard. This tool has **permit info for every country in the world** – what's required, and who to contact to get your permit.

Tell me about the Foreign Air Operator Certificate one more time

- This is required for Non-Scheduled (i.e. Charter/Pt135 landings) as well as Scheduled (i.e. Airline) flights landing in the Philippines.

- The application form is here.

- Download it, fill it in, gather together the required docs listed in the form, and ask a local agent in the Philippines to get it for you. We recommend Airmach Aviation. Other agents are out there.

- Yes, you could try going direct to the authorities instead (CAAP: odg@caap.gov.ph). We once knew some people who tried. Their bodies have never been found.

Have you been through this FAOC process? **Got any extra tips to share?** Or maybe you've operated a flight to the Philippines recently and have some stories to share? Let us know!

We Want Your Ops Stories!

David Mumford
25 September, 2024

Know something worth knowing about something? **Got a story to share?** Let us know! That's basically

how OPSGROUP works – you tell us, and we'll tell everyone in the group.

- **Been to Nicaragua and had to use their silly new overflight permit system?** Let us know!

- **Experienced one of those annoying security checks at an airport in Germany where they try to sneak onto the plane?** Let us know!

- **Had to disinsect your aircraft heading into Italy?** Let us know!

Or maybe your story is weirder still. Maybe it's a NIGHTMARE. Something like this recent account of **what to do when trying to take-off in a cicada swarm…**
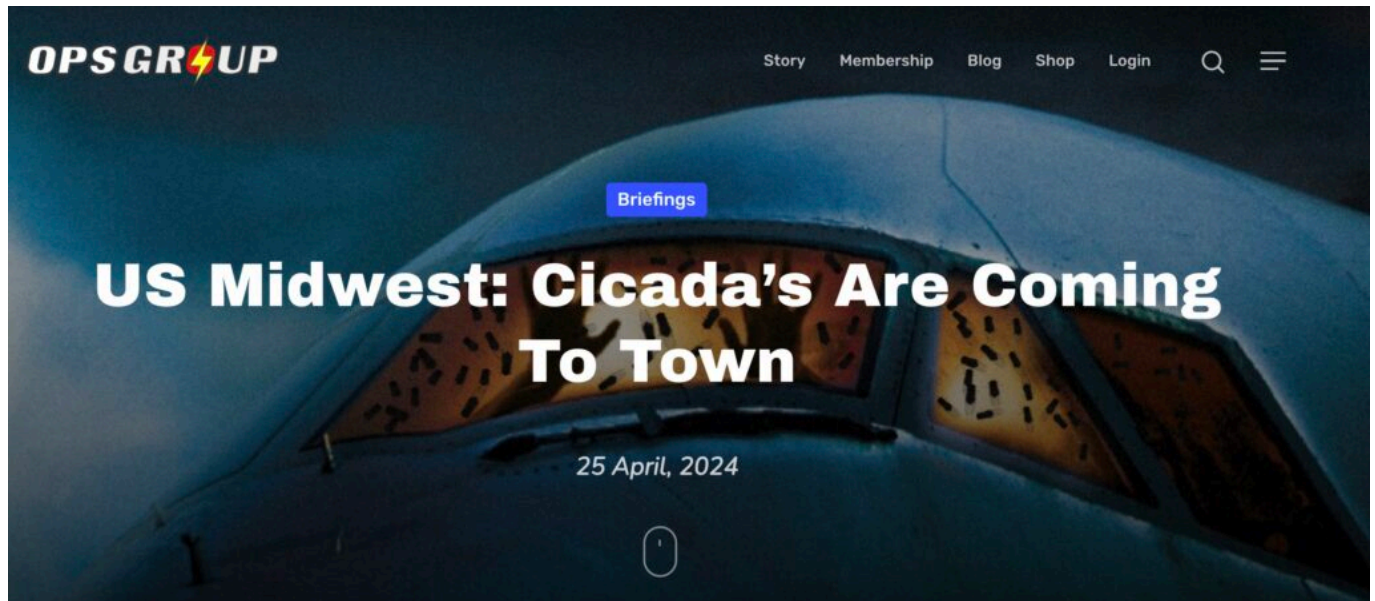
Ooh, that's a nasty one! But an *excellent story* – and **USEFUL!**

It's many years since we wrote this piece: What is OPSGROUP All About? It still holds true. We're still about all the same things – **keeping each other safe, being real, being human, helping each other out, speaking plainly, and sharing radically.**

So tell us your story! Chances are that other pilots and operators would be interested in what you know.

Or maybe you know how specific stuff works?

- **Know how to get an Australian TSP approved with minimal misery?** Let us know!

- **Got the lowdown on operating over Central Africa?** Let us know!

- **Fly regularly to China and know about Himalayan routings?** Let us know!

We've already published a bunch of posts written by people in the group who know about specific things like these. Here are some of our faves: (give em a click if you like!)

Briefings

NAT Conundrums Volume IV: Contingency Procedures

22 January, 2024

Briefings

Private Flights To The US

25 September, 2023

Briefings

EU Temporary Admission Of Aircraft – Busting Myths

11 September, 2023

ETA & UPT – What Operators Flying To The UK Need To Know

Briefings

5 December, 2023

Mexico Permit Chaos: New Rules Explained

Briefings

19 January, 2024

Pilot Mental Health: What Can We Do Right Now?

Briefings

26 April, 2023
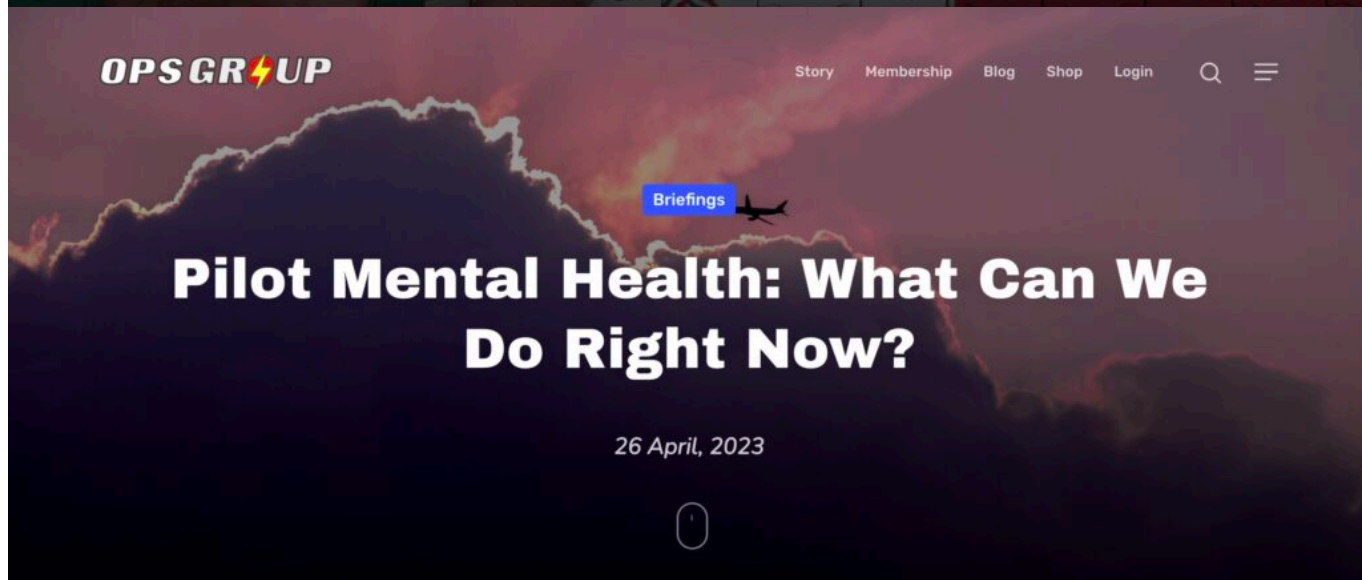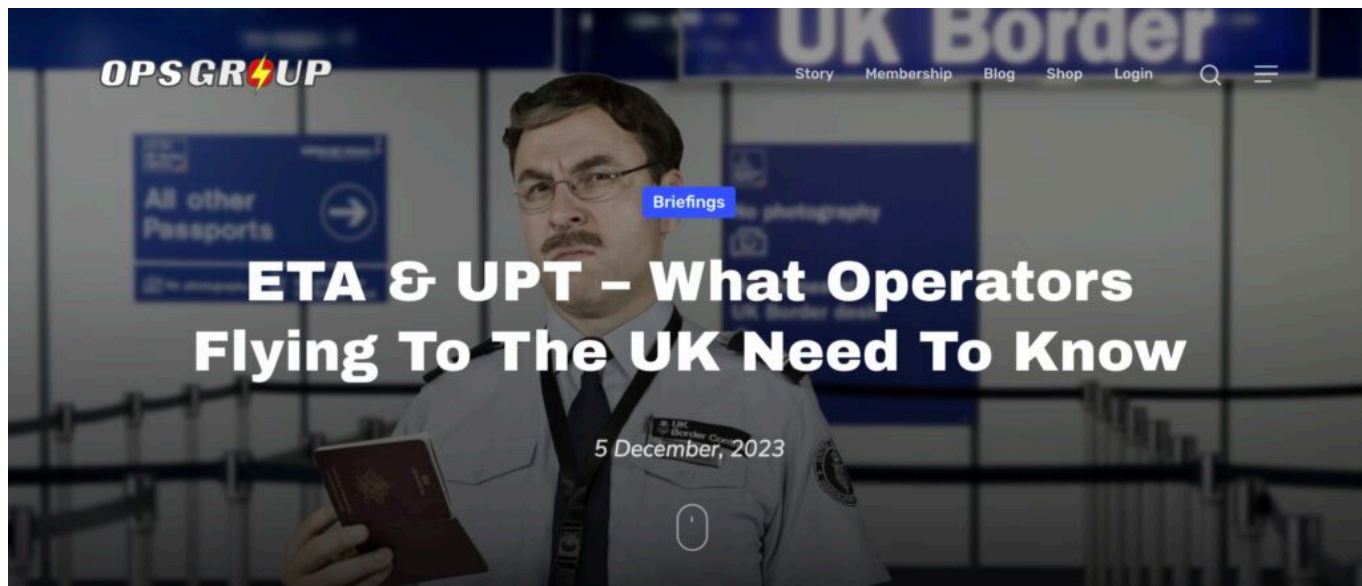
So if you've got a **story**, or you know about **some specific thing**, and you think other pilots and operators would be interested to hear about it, let us know!

That MMEL Thing: Here's an Update

David Mumford
25 September, 2024

It looks like there might finally be a solution to the long-running **MEL vs MMEL issue for US operators headed to Europe**, keen to **not get a ramp check finding!**

The *brief* Backstory

Since 2017, US aircraft have been getting hit with ramp check findings in Europe because EASA decided that the **D095 LOA** wasn't good enough – they wanted to see a **D195 LOA** instead, but it was taking operators a long time to get these approved by the FAA in the US due to a big backlog of applications.

The Solution

The FAA has published an updated Advisory Circular (AC 91-67A) which **speeds up the process of getting this D195 LOA.**

The NBAA have reported that the FAA has also updated guidance to its field offices, who will now issue the LOA after a brief review, provided the application is accompanied by an "attestation letter".

The *slightly longer* Backstory

Over the past few years, ramp checks on some US aircraft in Europe highlighted an important issue – EASA and the FAA have **different interpretations of the ICAO standards** regarding deferring aircraft discrepancies.

In the US, with FAA authorization operators can use a master minimum equipment list (MMEL) to defer repairing certain equipment. But in Europe, **MMEL cannot be used in lieu of an MEL specific to each aircraft or fleet.**

The European Aviation Safety Agency (EASA) began requiring all aircraft transiting European airspace to

have an approved Minimum Equipment List (MEL) for each, individual aircraft (i.e. a **D195 LOA**). An MEL that references the MMEL was not acceptable (i.e. a **D095 LOA**).

This was a pain for US operators, as to get an individual MEL approved under the LOA from the FAA takes time – but by not doing so, they ran the risk of **getting a ramp check finding** in a European country. (France seems to be the place where this happens most often!)

At the start of 2018, the rumour was that the FAA and EASA reached an agreement: the FAA would start requiring international operators with D095 LOAs to obtain new D195 LOA's instead, and in return **EASA would halt any findings** for a period of 12 months to allow for these new LOA's to be issued. There was no official announcement on this, but SAFA data did indicate that ramp check findings for use of D095 were greatly reduced for a time.

The FAA proposed a policy change to **phase out the D095 LOA** over the next 3-5 years, and to work out a streamlined approval process to **issue everyone with D195's instead**.

The French CAA said they would **stop issuing ramp check findings** once the FAA has launched the new policy.

FSDOs across the US then started processing the **backlog of D195 requests** from operators (there were lots!). In the meantime, US operators with the D095 LOA continued to face the same old MMEL findings on ramp checks in Europe.

How to prepare for a ramp check in Europe?

Here's the article we wrote all about how to make a ramp check painless.

And here is a copy of the OPSGROUP SAFA Ramp Checklist. Download it here.

Keep a copy with you and run through it before you head to Europe.

Further Reading

- SAFA Ramp Checks: The Top 5 Offenders
- SAFA Ramp Checks – Guidance Material
- How are ramp checks performed?

China-Taiwan M503 Airway Dispute

David Mumford
25 September, 2024

China has cancelled all concessions previously made to Taiwan regarding the **M503 airway** that runs along the ZSHA/Shanghai and RCAA/Taipei FIR boundary.

What does this mean in practice?

- **China have moved the airway 6nm back towards the FIR boundary.**
- **They have started allowing eastbound flights on the the W122 and W123 connecting routes.**

So now, of all these routes, the only one that is not bi-directional is W121 (westbound only).
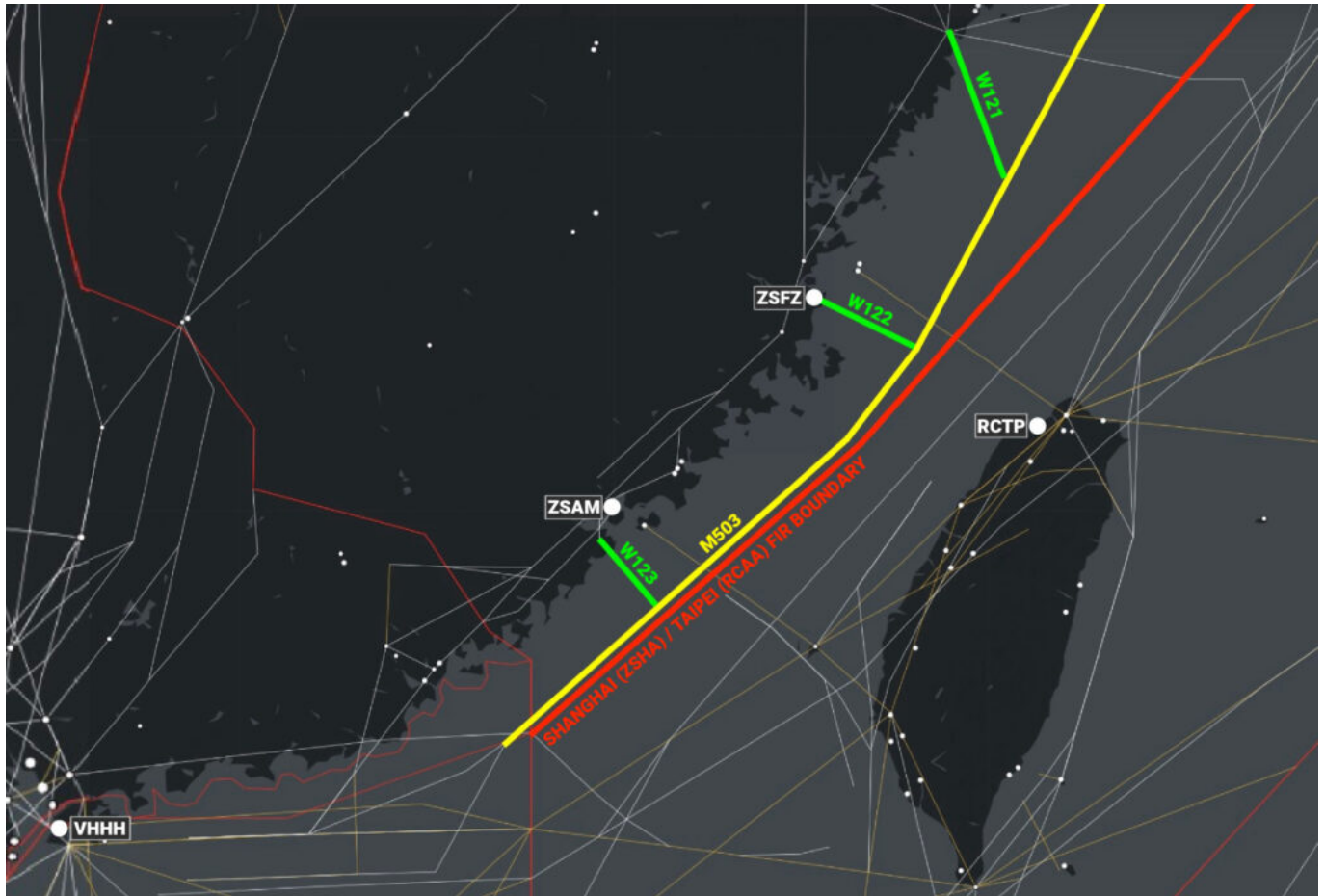
Taiwan aren't happy, same argument as before: they say the airway is too close to existing routes that serve airports in outlying groups of Taiwan-controlled islands, and thus poses a risk to safety. China have ignored them.

Can I use M503?

China only allow airway M503 to be used under certain conditions:

1. **Aircraft must be RNAV2 capable.**

2. **The flight must be going between VHHH/Hong Kong or VMMC/Macau and certain Chinese airports: ZSPD/Shanghai Pudong, ZSQD/Qingdao, ZSYT/Yantai, ZYTL/Dalian.**

Everything else transiting east-west across this region will need to use the congested parallel A470 airway along the southeastern coast of mainland China.

NAT Changes 2024: No More Oceanic Clearances

David Mumford
25 September, 2024

Key Points

- **ICAO have published a new NAT Doc 007, effective from March 2024.**
- **Big Change #1: There will be no more Oceanic Clearances on the NAT (now a mess).**
- **Big Change #2: NAT Comms Failure Procedures have been simplified.**
- **Big Change #3: Squawking 2000 ten minutes after OEP will be standard everywhere in the NAT.**

Once (or sometimes twice) every year, ICAO update their **NAT Doc 007 – the main guidance doc for ops over the North Atlantic.** All the specifics about how to operate your aircraft safely through the complex airspace of the region are here!

The new version for March 2024 has just been released!

Where's the new Doc?

You can find it on the ICAO page here.

Big Change #1: No More Oceanic Clearances

The idea is that with all the fancy tools ATC now have at their disposal (CPDLC, RSP and RCP compliance, and space-based ADS-B), we have reached a point where the Oceanic Clearance is no longer required.

It sounds drastic, but think of it this way: **the NAT will now just be the same as the rest of the world – you fly what is loaded in the FMS or as amended by ATC.**

ICAO have also published this Bulletin for flight crews on this specific issue of the removal of Oceanic Clearances. This Bulletin has been updated as of 22nd Jan 2024. **There are now different dates when Oceanic Clearances will cease to be issued in the following FIRs:**

- **Shanwick**: ~~April 9~~ ~~May~~ ~~Q4 2024~~ **December 4**
- **Gander**: ~~March~~ ~~May 3~~ **December 4**

- **Bodø**: ~~March~~ ~~May 6~~ ~~June 17~~ **December 4**

- **Santa Maria**: completed March 21

- **Iceland**: completed March 21

NATS (who manage Shanwick airspace) have published a video about this change, which shows exactly how it will work and what you will need to do.

Big Change #2: Simplified Comms Failure Procedures

As per Chapter 5 of the 007 Doc, from March 2024 here's what you do:

- **Comms failure <u>before</u> entering the NAT:** assuming you don't divert, you enter the NAT via the Oceanic Entry Point at the level and speed resulting from whatever radio comms failure (RCF) procedures you just had to do in adjacent airspace.

- **Comms failure <u>after</u> entering the NAT:** maintain the cleared route/level/speed until reaching the Oceanic Exit Point (ideally don't change route/level/speed unless you have to), then get back to your flight planned route "in the most direct manner possible" no later than the next significant point.

- **Comms failure if <u>operating to an airport in the NAT:</u>** follow the standard PANS-ATM procedures. *What are these?* – head to an airport aid/fix, hold until the ETA as per the flight plan, do a normal instrument approach, land!

Big Change #3: "Last Assigned Code" Procedures Standardized

A bonus one we spotted! We don't have to wait til April 2024 for this either – it has already happened. **Essentially, squawking 2000 ten minutes after OEP is now standard in the NAT.**

Since the dawn of time, everywhere on the NAT, this domestic code had to be retained for 30 minutes after entering NAT airspace. But back in July 2023, the UK changed it to 10 minutes for the entire EGGX/Shanwick FIR, and since then, all the other NAT FIRs have updated their rules to say the same – so

this new 10-minute rule has now become the standard across the NAT Region. **One exception**: if you're in the Reykjavik CTA, don't do it (they still have you on radar).

Phew, we survived!

Another year, another NAT Doc! Well, let's hope so – they do sometimes release a sneaky Version 2 update. But for now, we can relax.

Did you spot any other big updates in this new NAT Doc? If you do spot anything significant that we missed, please let us know! You can email us at news@ops.group

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Oceanic Errors on the North Atlantic

David Mumford
25 September, 2024

ICAO have updated their "Oceanic Errors" NAT Ops Bulletin – the doc which has all the advice for operators on **how to avoid the common mistakes when flying the North Atlantic.**

These include: Gross Nav Errors, Large Height Deviations, and Longitudinal Separation busts. There's also some advice on Flight Planning, SLOP, and some datalink things to watch out for.

You can download the NAT Ops Bulletin here:

Looks like there are no big changes in terms of content for this updated version when compared with the old one from last year – they've improved the language to be more friendly to human ears, and corrected some of the references. But if you operate over the North Atlantic it's still worth a read, as there's lots of **top tips on how to avoid the most common gotchas!**

# TCAS Saves the Day in Somalia

David Mumford
25 September, 2024
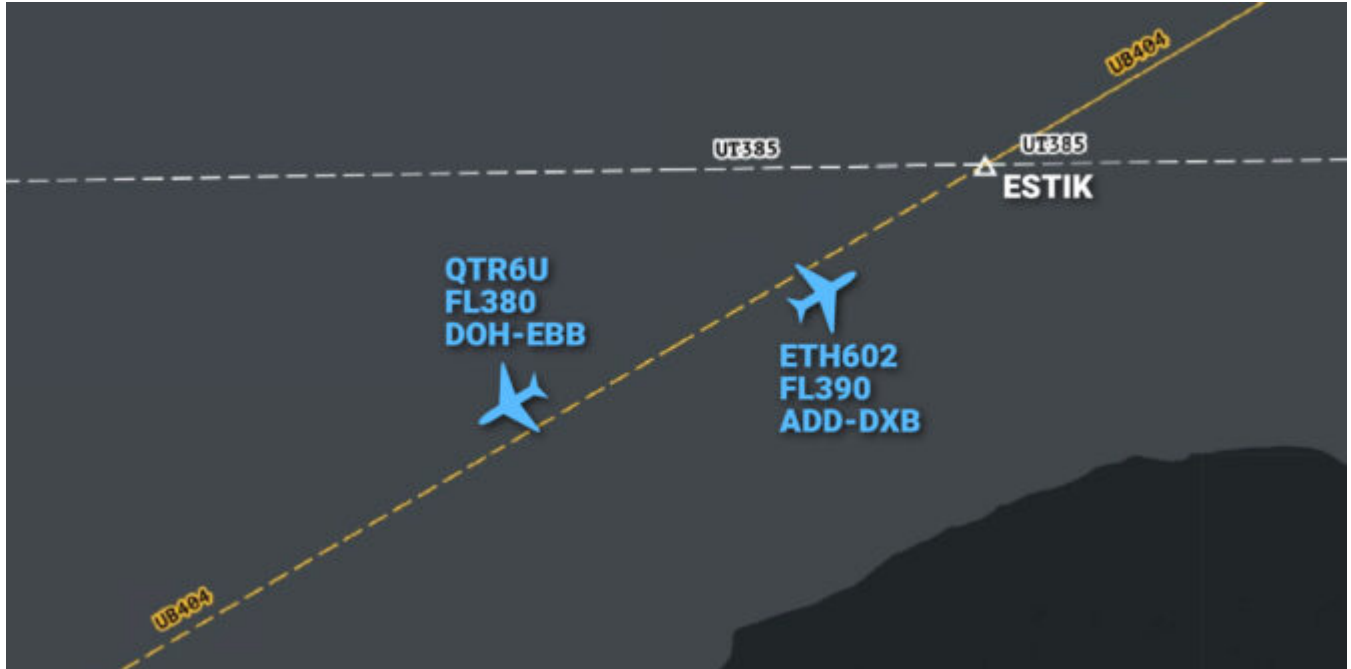
Last week we told you about a new risk emerging over Somalia, where **several enroute aircraft reported being contacted by unauthorized ATC units.** These "fake" controllers have been issuing climb/descent instructions that conflict with the official ones issued by Mogadishu Control.

This week, the very same thing happened to crews of a Qatar Airways 787 and an Ethiopian Airlines A350 **headed towards each other off Somalia's northern coastline.**

The 787 was instructed to climb from FL380 to FL400 whilst the A350 was cruising at FL390 in the opposite direction on the same UB404 airway – near position ESTIK. **A TCAS alert was triggered, and the 787 descended back to FL380 to resolve the conflict.**
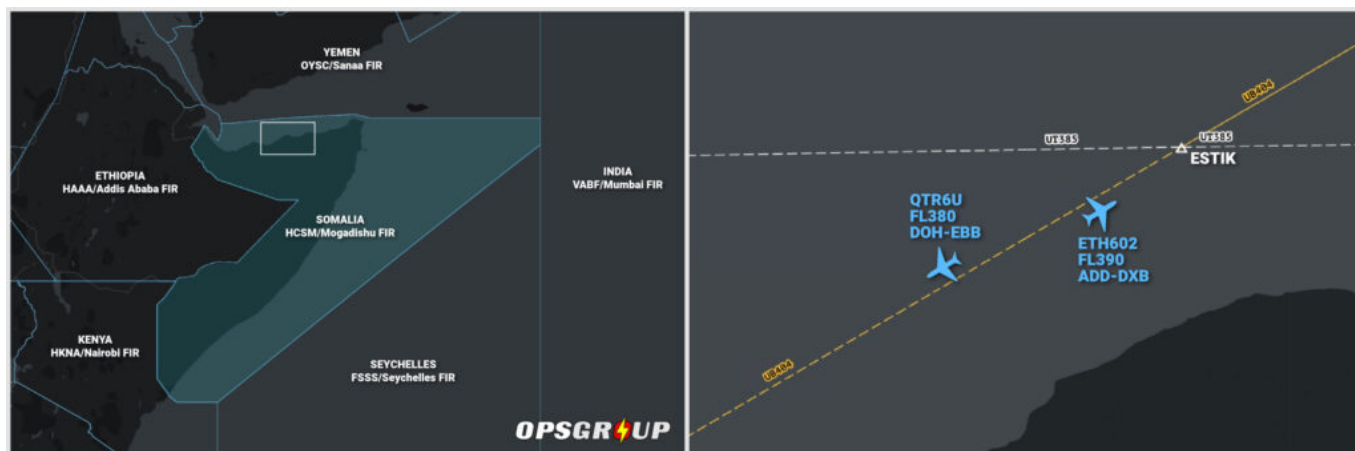
From some reports it looks like the two aircraft were **separated by as little as 2.5 nm** when the incident happened, though the situation was helped by the fact that both aircraft were laterally offset from the airway (yay for SLOP!).

Who should I be talking to?

The two competing ATC centres here are Hargeisa (Somaliland) and Mogadishu (Somalia).

==For aircraft transiting the HCSM/Mogadishu FIR, it's Mogadishu ATC that you should be talking to – not Hargeisa.==

Mogadishu Control holds authority over the entire Mogadishu FIR, responsible for coordinating and providing ATS services in the Upper FIR. **Hargeisa in Somaliland issues secondary transmissions, posing a potential threat to enroute traffic.**

Notably, these transmissions from Hargeisa seem to mimic Mogadishu rather than clearly identifying as "Hargeisa Control" or "Somaliland Control." Reports suggest that **control instructions from Hargeisa aim to create confusion rather than ensure traffic de-confliction**, possibly as a strategy to draw political attention to their recent dispute with Somalia.

Advice to operators

Check our previous post for a **full Risk Warning**, including Crew Reports, Maps, Analysis, and Guidance. *And if you can't access, just email the team and we'll send you a copy.*

==The main advice is this:==

1. **If possible, avoid the Mogadishu FIR.**
2. **If entering the airspace, expect secondary ATC transmissions from Hargeisa.**
3. **Limit any contact with Mogadishu to CPDLC only. Only controllers in Mogadishu have access to CPDLC.**
4. **Do not accept any level changes without ensuring they are genuinely from Mogadishu Control.**
5. **Avoid requesting any level changes while within the Mogadishu FIR.**
6. **Listen out on 126.9 (IFBP) and follow the IFBP procedure.**

7. Note that related NOTAMs issued by Somalia may not present the full picture, or be updated regularly.

Download the Risk Warning (PDF, 9 pages, 2Mb)

US FAA: Who wants to land on the runway?

David Mumford
25 September, 2024

1. **Flying to an airport in the US?**

2. **Want to land on the actual runway, rather than some taxiway or dirt road which looks a bit like the runway?**

3. **Not afraid of some basic pics showing you how NOT to mess it up?**

Well then today's your lucky day, friend!

Arrival Alert Notices

The US FAA has published things called Arrival Alert Notices at several airports with a history of "misalignment risk" – i.e. where aircraft line up to or land on the **wrong runway, taxiway, or even sometimes the wrong airport**.

The best thing about these Notices is that they are dead simple. No superfluous symbology, no weird language, just a **nice big picture of the runway with a clear instruction on what to do.**

The FAA published the first batch of these in May 2022, and then a whole bunch more in Jan 2024. So they now have them for **41 airports in total,** all of which have a history of misalignment risk or "wrong surface events" – i.e. times where folks landed on something other than the *actual runway.*

They say that many of these wrong surface events occur "during the daytime and in visual meteorological conditions, and the majority of the time, the pilot has read back the correct landing clearance." In other words, folks have got it wrong even at the best of times, so it's probably worth a quick glance at these docs.

Which Airports?

This map on the FAA AAN site shows the airports that have Arrival Alert Notices.

Airports with Arrival Alert Notices

This map below shows the airports that have Arrival Alert Notices.

Arrival Alert Notices
Click a location to view the Arrival Alert Notice files.

APA	BED	BFI
BJC	BOI	CCR
CHD	CMI	CNO
DCA	DPA	DVT
ELP	FAT	FCM
FFZ	FTW	HIO
HND	HNL	IDA
IWA	LAN	LNK
LVK	MRY	OPF
PAE	PBI	PDK
PSP	PTK	PWK
RHV	RNO	ROC
SLC	TKI	TUS
VGT	VNY	

Continental U.S.

Filters

State
(All)

City
(All)

Airport
(All)

Click to Reset

Alaska　　**Hawaii**　　**Puerto Rico**

What else is the FAA doing to improve safety?

A whole bunch of things. You can read all about it on their Runway Safety site, but here's a summary. *And as a cheap marketing trick by way of parting, I will say that the last one on this list is probably the best – so make sure you read to the end!*

1. **Runway Status Lights (RWSL):** In operation at 20 airports, signals potential hazards through illuminated red lights on runways and taxiway/runway crossings. More info.

2. **Airport Surface Detection Equipment, Model X (ASDE-X):** In operation at 35 airports, integrates various data sources to provide ATC with better aircraft positions, and pings up alerts for potential traffic conflicts. More info.

3. **Airport Surface Surveillance Capability (ASSC):** Similar to ASDE-X, ASSC operates at 9 airports, works in all kinds of weather, and lets ATC see aircraft on approach and departure within a few miles of the airport. More info.

4. **ASDE-X and ASSC Taxiway Arrival Prediction (ATAP):** ATAP is an enhancement to the previous two, and alerts ATC when an aircraft is aligned with a taxiway instead of the runway. In operation at these airports.

5. **Engineered Material Arresting System (EMAS):** We like these things so much, we wrote an article on them. Installed at 70 airports, EMAS are those crushable bits of tarmac at the ends of runways which you can plough into to stop overruns. Very cool. More info.

6. **Electronic Flight Bag (EFB) with Moving Map Displays:** Everyone loves their EFBs and moving maps. So do the FAA – they encourage pilots to use them!

7. **Runway Safety Areas (RSA):** Because many runways were built before the 1000-foot RSA standard was adopted, the FAA implemented the Runway Safety Area Program which made improvements to over 1000 runways at 500 airports.

8. **Runway Incursion Mitigation (RIM):** A national initiative identifying and mitigating specific risks at 80 airports that might lead to a runway incursion. Things like: unclear taxiway markings, airport signage, runway or taxiway layout.

9. **Hot Spot Standardization:** The FAA now has standardized hot spot symbology on their airport charts. We wrote about this here.

10. **Arrival Alert Notices:** i.e. this article!

11. **Automated Closure Notice Diagrams:** They now have a site where you can get a big airport chart showing all the runway or taxiway closures on it. It looks like AI might be involved behind the scenes on this one, so it's a bit clunky for some airports, but it's still pretty cool. Check it out here.

12. **"From the Flight Deck":** This might just be the best of the bunch! This FAA website basically has videos showing how to land at specific airports (real footage), plus a bunch of other useful info: hotspots, things local ATC want pilots to know, airport comms, airspace details and other preflight planning resources. Take a look here!

The North Atlantic Datalink Mandate – 2024 update

David Mumford
25 September, 2024

A period of temporary relief of the North Atlantic Datalink Mandate (NAT DLM) rules ended in Feb 2021. So since then, **aircraft need to be CPDLC and ADS-C equipped to operate between FL290-410 throughout the NAT region.**

Exceptions – areas where you DON'T need datalink

– Everything north of 80°North.

– New York Oceanic East FIR.

– Tango Routes T9 and T290. *The other Tango routes (T213, T13, T16) all require datalink.*

– GOTA airspace. We discovered this in Aug 2022, after some lengthy discussions with the authorities.

– ATS Surveillance airspace, where surveillance service is provided by means of radar and/or ADS-B, coupled with VHF. This includes the Azores, Bodo, and Iceland-Greenland corridor.

Tell me more about this "ATS Surveillance airspace"

This is a tricksy one.

NAT Doc 007 sets out the exempted ATS Surveillance airspace over **Greenland and Iceland** where you can still fly if you don't have datalink (though if you don't have it, you must have ADS-B!)

This area is bounded by the following:

Northern boundary: 65N000W – 67N010W – 69N020W – 68N030W – 67N040W – 69N050W – 69N060W – BOPUT.
Southern boundary: GUNPA (61N000W) – 61N007W – 6040N010W – RATSU (61N010W) – 61N020W – 63N030W – 6330N040W – 6330N050W – EMBOK.

Here's how that looks:
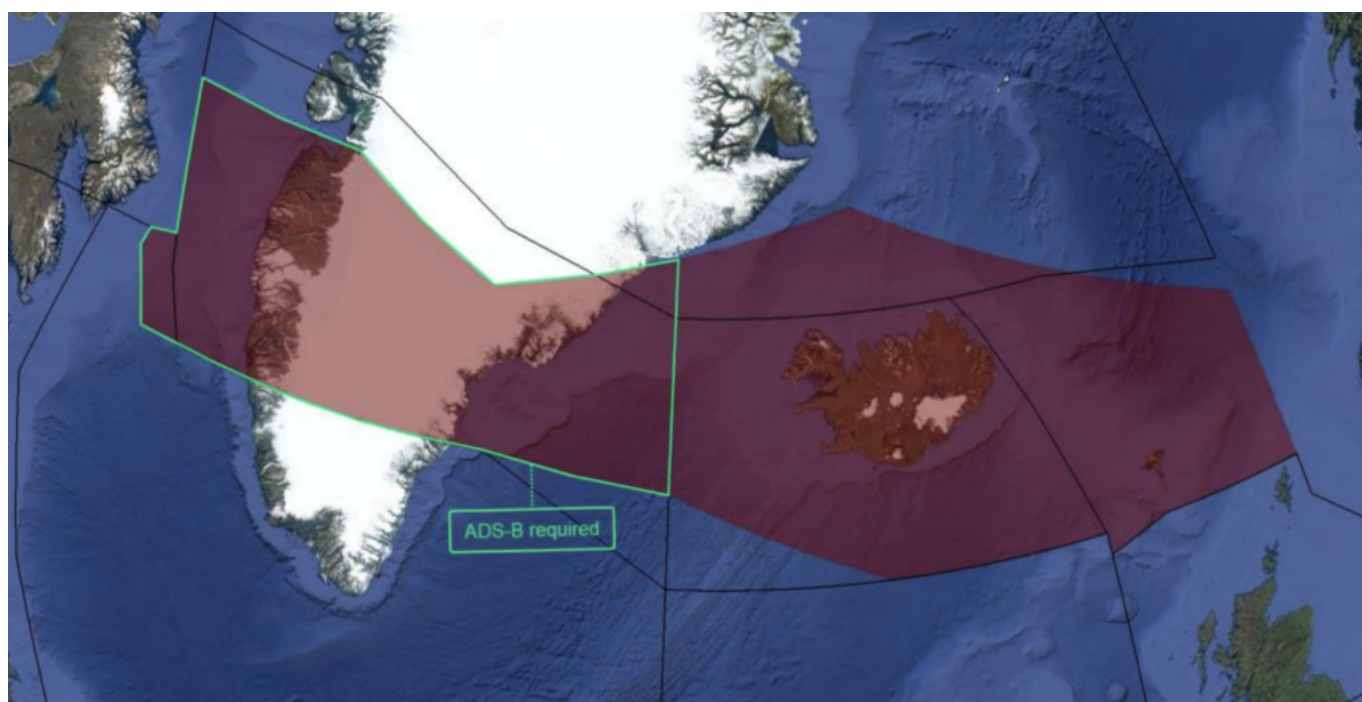
The southerly Blue Spruce routes

These go over Greenland linking Canada with Iceland via waypoint OZN, and are <u>not fully contained in the</u>

exempted airspace. So if you're flying these southerly Blue Spruce routes you will have to meet the NAT DLM requirements or fly outside of the vertical parameters of DLM airspace (i.e. below FL290 or above FL410). In other words: **you need CPDLC and ADS-C to fly on the southerly Blue Spruce routes between FL290-410.**

The northerly Blue Spruce routes

These are the ones going overhead BGSF/Sondrestrom airport. These do fall within the exempted area of airspace – **so datalink is not mandatory if you're flying here.**

Aircraft without datalink can request to climb/descend through datalink mandated airspace, but will only be considered on a "tactical basis" by ATC (i.e. you have to ask them on the day, and they'll let you know, depending on how busy it is).

Flights that file STS/FFR, HOSP, HUM, MEDEVAC, SAR, or STATE in Field 18 of the FPL, are **permitted to flight plan and fly** through datalink mandated airspace, but may not get their requested flight levels.

For more details about the datalink mandate, check out the **NAT Doc 007** in full here.

So, to recap...

- **Datalink Airspace:** Remember, NAT DLM airspace only applies from FL290-410. Below or above that, you don't need datalink in the North Atlantic.

- **If you have full datalink (CPDLC and ADS-C):** You can go where you like. But watch out here – "full datalink" means you have Inmarsat or Iridium. HF datalink alone (ACARS) does not meet the satcom part of the NAT DLM requirement. So if you want to fly in NAT DLM airspace (FL290-410 in the NAT region) "J2" in field 10a of your FPL isn't enough – you need "J5" for Inmarsat or "J7" for Iridium.

- **For GOTA airspace:** You need a transponder, automatic pressure-altitude reporting equipment and VHF. If you have ADS-B, that's helpful for ATC.

- **For the Blue Spruce Routes:** You need datalink for the southerly ones, but not the northerly ones. (If you're flying on these then you're probably doing so below FL290 anyway, in which case you're below NAT DLM airspace and don't need datalink).

NAT FAQ: No Datalink, Where can we go?

If you don't have datalink, this is how to make a crossing.

Libya Airspace Risk: An Idiot's Guide

David Mumford
25 September, 2024

Key Points

- EASA has amended its Conflict Zone Information Bulletin (CZIB) for Libya. **They no longer recommend against flights to "airports located on the coast"** – as long as you *approach from the sea, talk to ATC, and do a risk assessment.*

- This new advice is curious, because it's **not clear there has actually been any reduction in airspace risk here.** None of the Libya airspace warnings issued by other countries (US, Canada, Germany, France, UK, etc), have changed recently. Everyone says the same thing – there remains a high risk to civil aircraft in Libyan airspace (HLLL/Tripoli FIR), and it should be avoided.

- Read on for a 7-Step Idiot's Guide to Libya – a look at airspace risk, with some maps, pictures, analysis, and advice for operators.

An Idiot's Guide to Libya

I'm Dave, and I'm an idiot. It's been 12 days since I last did something stupid.

I know almost nothing about Libya.

Back in the day, I worked for a cargo airline that did flights there. We picked up some cheap fuel in Tripoli before jetting off down to Entebbe to pick up fresh fish to take back to Europe.

God knows why. **Fly to Uganda to get some fish to take back to the UK?** A country literally surrounded by sea needs to send a plane to Africa to get some fish? Makes no sense, does it. But it never occurred to me – **because I'm an idiot.**

I bashed out a few flight plans – Ostende to Tripoli to Entebbe and back again – and hoped for the best. **And most times, things went just fine.**

We stopped operating in 2010. No more Libya, no more Uganda, no more fish.

Good thing too, because four years later, Libya descended into chaos with the outbreak of a **civil war that saw HLLT/Tripoli airport closed after clashes between rival militias destroyed most of the**

airport's facilities. The airport remains closed to this day; most flights operate out of the city's other airport – HLLM/Mitiga.

All the standard **"Do Not Travel"** warnings followed soon after, and people stopped flying to Libya.

<mark>So here we are, ten years later, and **EASA are now saying it's probably OK to start flying to airports on Libya's coastline** again – as long as you approach from the sea, talk to ATC, and do a risk assessment…</mark>

Hmm, sounds weird, doesn't it? Why on earth would we want to do that? Well, let's have a look…

Step 1: Find Out Where It Is

Remember, this is an "Idiot's Guide" where I know almost nothing about Libya. So this is where we start.

Step 1 complete!

Step 2: Find Out How Scary It Is

Yeah but that's travel advice for passengers. **We're pilots, so we want to know about airspace and missiles and stuff…**

Oh dear. None of that looks great either, does it?

Step 3: Actually Read The Warnings In The GIF

Just like the classic 80's tv advert said: **GIFs are for Christmas, Airspace Warnings are for life.**

Or was it dogs? GIFs are for dogs, not just for Christmas? Christmas is for GIFs, not just for dogs?

Something like that. What I mean is – GIFs are hardly a solid basis for a risk decision of this magnitude. It's worth taking some time to check out what the **official airspace warnings** actually say…

Safeairspace.net is our **Conflict Zone & Risk Database.** It will tell you what you need to know about airspace warnings.

<mark>**The short story for Libya is this:** Several countries have airspace warnings for Libya, and all say pretty much the same thing – operators should avoid Libya's HLLL/Tripoli FIR entirely, due to the potential risk from anti-aviation weaponry and military operations. Libya remains an active conflict zone with armed clashes between various rival militia groups across the country, and there is a high risk to civil aircraft.</mark>

Starting to get the feeling like we've been here before? That's because we have. We asked all these exact same questions back in 2022, and again in 2023, and decided that **no, Libya probably wasn't safe to fly to.**

But anyway, that was then and this is now. On with the guide…

Step 4: Check The News

August 2023: Major evacuation of aircraft from Tripoli due to violent clashes and gunfire at Mitiga airport. More info.

Aug 2022: Militia air defense forces claimed to have shot down a US drone operating in the vicinity of Benghazi during a period of increased tensions and threats of renewed violence between competing militias vying for control of Tripoli.

June 2022: Failed attempt by militia to enter Tripoli to seize control of government offices, resulting in armed clashes and suspension of flights at HLLM/Mitiga airport.

Jan 2020: Multiple airstrikes targeting HLLM/Mitiga airport. Videos on social media showing planes landing at the airport as shells are falling in the background.

Nov 2019: Militia advancing on the capital, Tripoli, declared a no-fly-zone around the city, threatening to shoot-down civil aircraft attempting to fly to HLLM/Mitiga airport.

And that's just the big-ticket aviation related stuff. For a full history of the endless horrors suffered by the poor people of Libya stretching back to 2011, check here.

Step 5: Ask Someone Who's Gone There

If in doubt, **just look at what other people are doing.**

Here's a report we recently received from an operator who went to Libya:

Step 6: Ask Someone Who Has To Deal With It ALL THE TIME

The ultimate shortcut to solving complex stuff you don't know much about? **Ask someone who knows a whole bunch about it.**

Here's a report from ATC in a neighbouring ACC to Libya:

Step 7: Conclusion

The conclusion to this Idiot's Guide to Libya? **NO. Do Not Fly. Avoid.**

If you need reminding, you can print out this helpful Opsicle, and take it with you in your flight bag.

Libya Airspace: An Idiot's Guide

NO

Not an idiot? Want some actual info? Click here.

⬆ You can click the image above to download the PDF.

Postscript: The Curious Case of the EASA CZIB

We mentioned this at the start. And in the middle. Now again here at the end.

In their amended CZIB, EASA are now saying it's probably OK to start flying to airports on Libya's coastline again – as long as you approach from the sea, talk to ATC, and do a risk assessment.

If you're a European airline keen to resume flights to Libya, **you might like this piece of news.** Everyone's risk appetite is different, after all.

Some history here: In July 2023, Italy cancelled its 10-year ban on flights to/from Libya, the idea being to resume airline flights between the two countries at some point. So aircraft are technically no longer banned from Italian airports and airspace if they want to fly from Libya (apart from Libyan operators, who are still banned from EU airspace). You still need to get special permission from the Malta CAA if you want to do this, as per the LMMM Notams.

Why is the amended EASA CZIB "curious"? Because there's no evidence that there has actually been any reduction in airspace risk here. None of the state airspace warnings have changed, and EASA have not provided any of the reasoning behind the decision to ease their warning.

So for now, our advice remains the same: Libyan airspace (the HLLL/Tripoli FIR) should be avoided

entirely.

See you again next year for another look at why you might want to avoid Libya!

Free Route Airspace in Africa

David Mumford
25 September, 2024

Key Points

- **Free Route Airspace (i.e. you can fly direct between waypoints) is now available across most parts of ASECNA airspace in Africa, FL250 and above, as of 25 Jan 2024.**

- **There are a few other places in Africa where FRA is available too.**

- **There doesn't seem to be a map of where <u>all the FRA regions in Africa</u> are, so we made one (check the map right at the bottom of this article!)**

Where is ASECNA airspace?

Here:
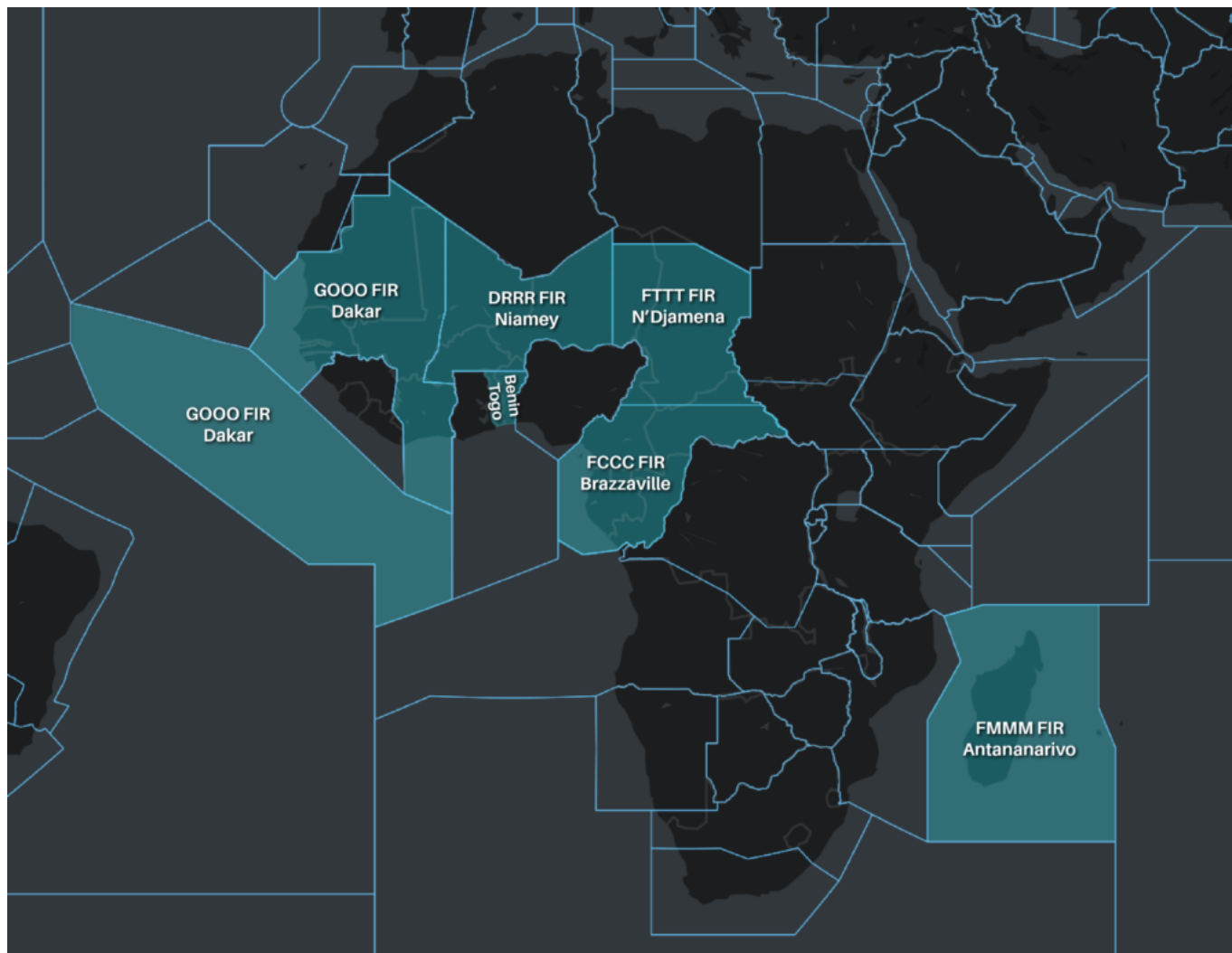
Which parts have Free Route Airspace here?

These UTAs: Nouakchott, Bamako, Ouagadougou, Abidjan, Lome, Niamey, Douala, Libreville, and Brazzaville.

These FIRs: GOOO/Dakar, FTTT/Ndjamena, and FMMM/Antananarivo.

Flights can plan direct between the **reporting points of the boundary of the respective UTA or FIR.**

Unfortunately, there **doesn't seem to be one nice big map** showing exactly where these all are.

We grabbed the waypoints from the ASECNA AIP ENR Section 3. We tried plotting all these on one map, but it quickly became very messy. So here's a turgid list of waypoints for you (sorry!) just in case you want them:

Ouagadougou UTA: OPUGO TAREN DEKAS OXIDU UMOVO NAVON TUMUT NANGA BIGOM TUXID ANIXA EBSUD EDGIB ONUSI TAVOT NUSUR.

Douala UTA: OBUDU TAKUM PONDO KEMOX ARKEV DESAM TAPEK VOLMU ARASI BTA IPOVO GEBRO ARDEX RALIN ILBAS IKROP.

Brazzaville UTA: PONDO GADUV INIGO ASSAM TJN NAMOR NARTU UMOSA EDGUM RULDO NASED MISRU ONUDA KITEK ASKON AMPER BOSKI POGBA MERON OPDAK GOPUR MPK PIPLO AGTOM EMSAT BAMAV AMSIK BZ PIRMI LIKAD ARAKI TIMAK NERUP SEMUL ARKOS GARLA ONLEN EDOTO PILVI TAPIL MOVOD NEBEX MISTI ONKAR TAPEK DESAM ARKEV KEMOX.

Abidjan UTA: BIGOM AMSAT TUSEK ONESI SESIG EGADU ARABA GANKA INAKA RASAD EMTAL URAPI ATANI ARLEM IPEKA DEVLI MEGOT UBUTU AMPAS ERMIT GUREL TUXID.

Libreville UTA: BIPIV GEBRO IPOVO BTA ARASI VOLMU ONKAR MISTI NEBEX MOVOD TAPIL PILVI EDOTO ONLEN VORET ILDAN NURIP AGSIM AGRUB GULEP BOVGA.

Bamako UTA: GUREL VOLNA MOPAL UBATI NEGLO GATAX IPUGA MESER KIMGA ILDES EREMO ONTOL ONIMI ONUSI EDGIB EBSUD ANIXA INPOS.

Nouakchott UTA: NEVDI DEMIL POVIN MOKOD TIPAD ILDES EREMO ONTOL ONIMI POTOL ODATA SBITA BRENA BULIS ECHED MIYEC.

Niamey UTA: TERAS ZAWAT INAMA EREBO ERKEL TOBUK IKTAV RAKOM NAMIS INISA IPANO SABSI RIPOL KORUT RISUB DETAR MOLIT USNAV POMPA NANOS UBEVA DOGON GULEN BOVDA LITAK SIRTO TATAT BATIA GAPAG ENOXO BULSA TAREN OPUGO GALIV NUSUR TAVOT MTI ONIMI ODATA POTOL USRUT IPOBA MOKAT.

Lome UTA: GAPAG BATIA TATAT SIRTO LITAK NASTO GANDA TENTU SEVAX OPALA TEMSA POLTO KIPSA EPITI GASLO KETAT NEPRO USTIX PAMPA BUDNO IPORI ARLEX TAMIL ENOXO.

FTTT/Ndjamena FIR: IPONO LIGAT TONBA GARIN DEKTU RAKOM NAMIS INISA IPANO SABSI RIPOL ENBUT RAVOT ONTOP SIGAL KELAK MOMIG ONSEV EBIMU ETRIS GATAG INIGO ASSAM TJN NAMOR NARTU UMOSA EDGUM RULDO NASED MISRU ONUDA KAFIA MONAN KISAL KURAM ILBIB GENEI.

GOOO/Dakar FIR: SEPOM LUMPO MOGSA AKDAK BADIA IPUGA NEVDI BIKIS.

FMMM/Antananarivo FIR: ETGUN TETRO SUNIR EROPA EGMAD NERUL IXEMA IMKIB ETLEG GADNO ETLOP ENDEL SOLAL KINAN TABNO BERIL ATOLA NESAM DENLI ANKOR MIROV RUPIG AMBOD IBMAT APKOT APLEM UVENA DOBUT EGLIP UNKIK GERAG GETIR.

We did make a little map of the **FMMM/Antananarivo (Madagascar)** ones, cos they're kinda funky:

And we made this little map of the **GOOO/Dakar (Senegal)** ones too, just because the airspace covers a massive area (and there's also the Dakar Oceanic FIR too) but **you can only plan direct within a very small area:**

For more info, check the full details in the ASECNA AIP ENR 3.5 sections.

Where else in Africa has Free Route Airspace?

Good question! We think it's just these places:

Morocco: FL195-FL460 in the Agadir CTA (currently only available between 2200-0600z)

Ghana: FL290-FL460 in the DGAC/Accra FIR between latitudes 2N and 11N.

Nigeria: FL245 and above in the DNKK/Kano FIR.

Mauritius: FL245-FL460 in the southern part of the FIMM/Mauritius FIR South of 25S.

So, putting that all together on one map (which is the thing we really wanted in the first place)…

Here are all the places in Africa which now have Free Route Airspace!
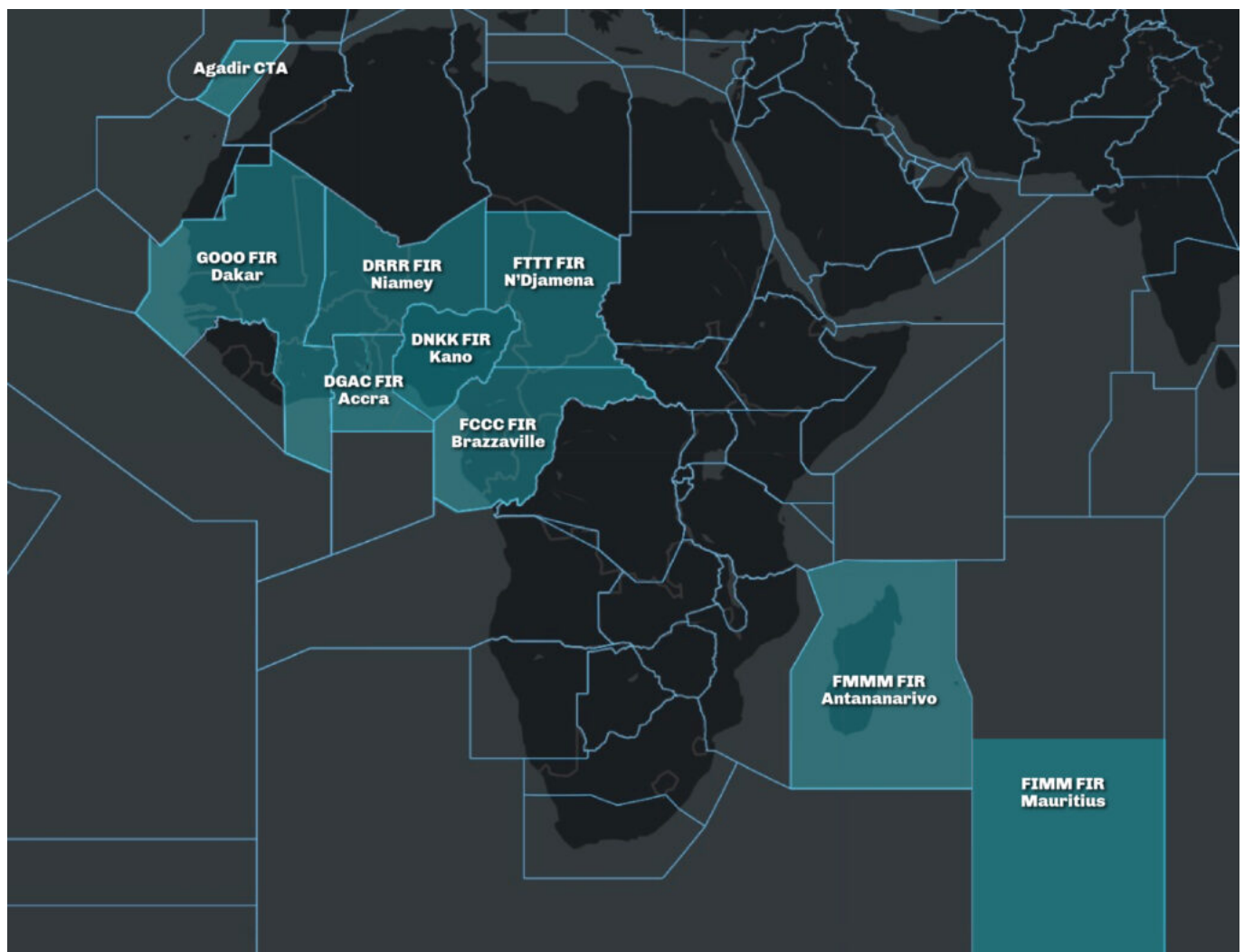
Phew, we made it there in the end.

If you know of any more places which should be added to this map (FIRs, UTAs, CTAs, etc), let us know: news@ops.group

March 2024 Singapore Airspace Changes

David Mumford
25 September, 2024

Singapore and Indonesia will **realign their FIRs** from 21 Mar 2024.

They agreed to do this so that the new FIR boundary (between the WSJC/Singapore and WIIF/Jakarta FIRs) will be generally more aligned with Indonesia's territorial boundaries.

It looks like not much will change in terms of flight ops, as **Singapore will continue to control the airspace. For full details of the upcoming change, check SUP 18/2024.**

But there is one important issue this FIR realignment will hopefully fix for good – it will now be more clear that **overflights of Indonesia's Riau Islands require an Indonesia overflight permit!**

This has been an issue in the past, with some flights not realizing they needed an Indonesia overflight permit to overfly these islands – as they sat under the WSJC/Singapore FIR.

In 2019, two Indonesian F-16s intercepted an Ethiopian Airlines cargo flight for flying across Indonesian airspace without permission. The aircraft was initially supposed to operate from HAAB/Addis Ababa to VHHH/Hong Kong, but was modified at the last minute to route via WSSS/Singapore instead. **The aircraft was intercepted forced to land at WIDD/Batam Island.**
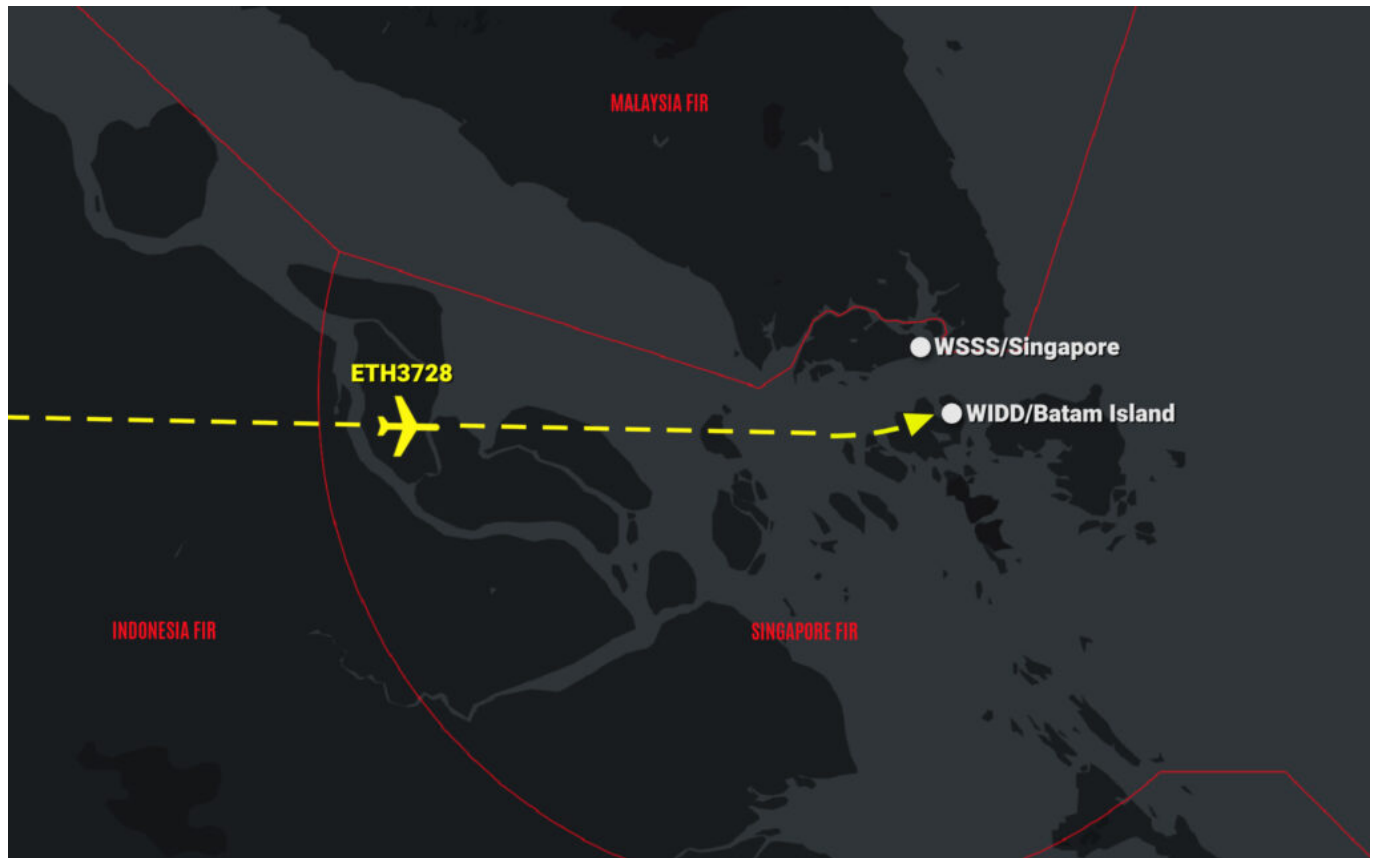
There have been several other incidents both before and since then, including some where Indonesia blamed US and Indian military planes of violating their airspace without permission.

But when the FIRs realign on 21 Mar 2024, there should hopefully be **no more confusion about permit requirements** for this chunk of airspace! You can find all the details in **SUP 18/2024**, but here's how it's going to look:
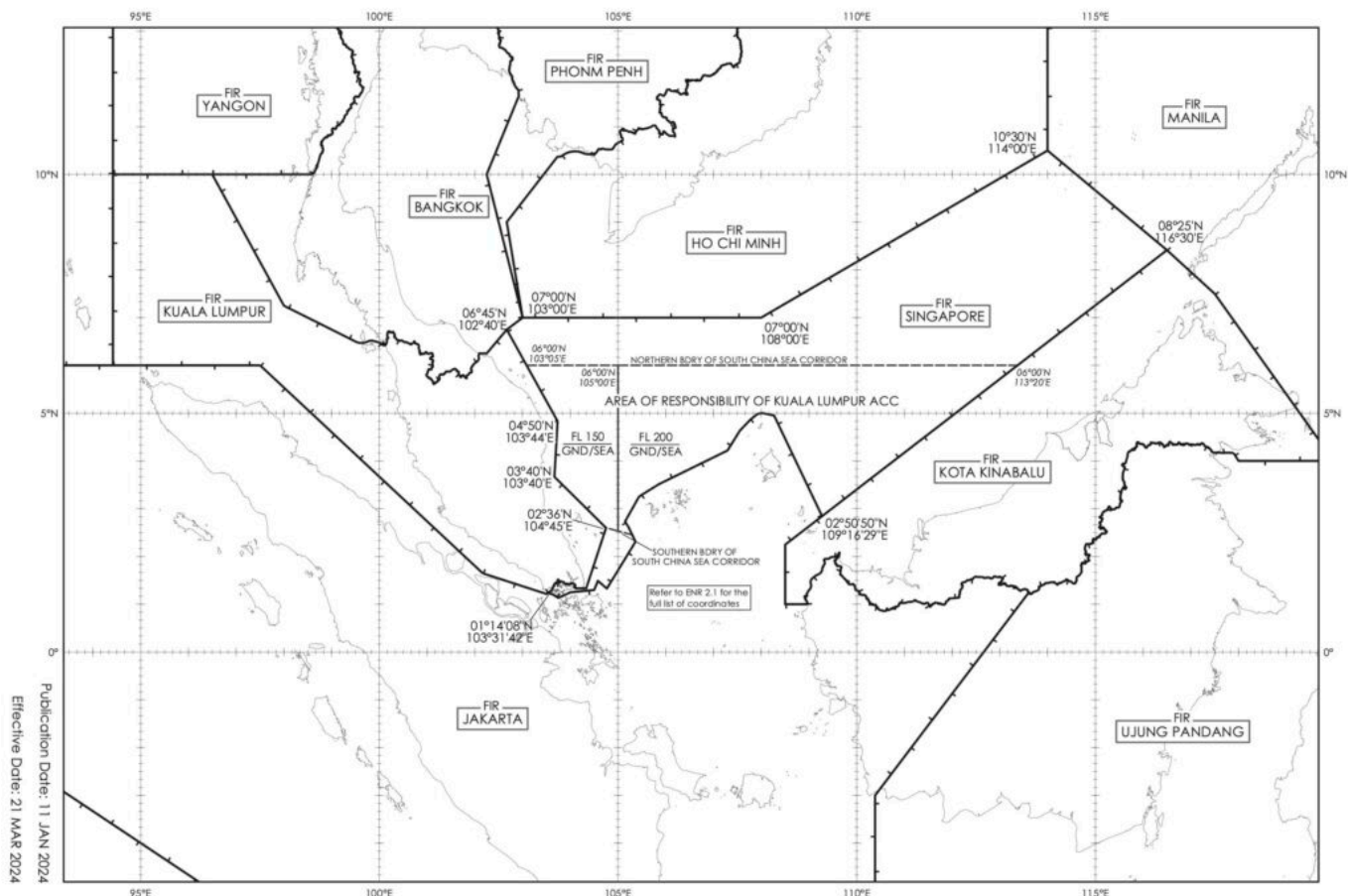
And this one is maybe useful too – this shows the **airspace which will continue to be controlled by Singapore ATC:**
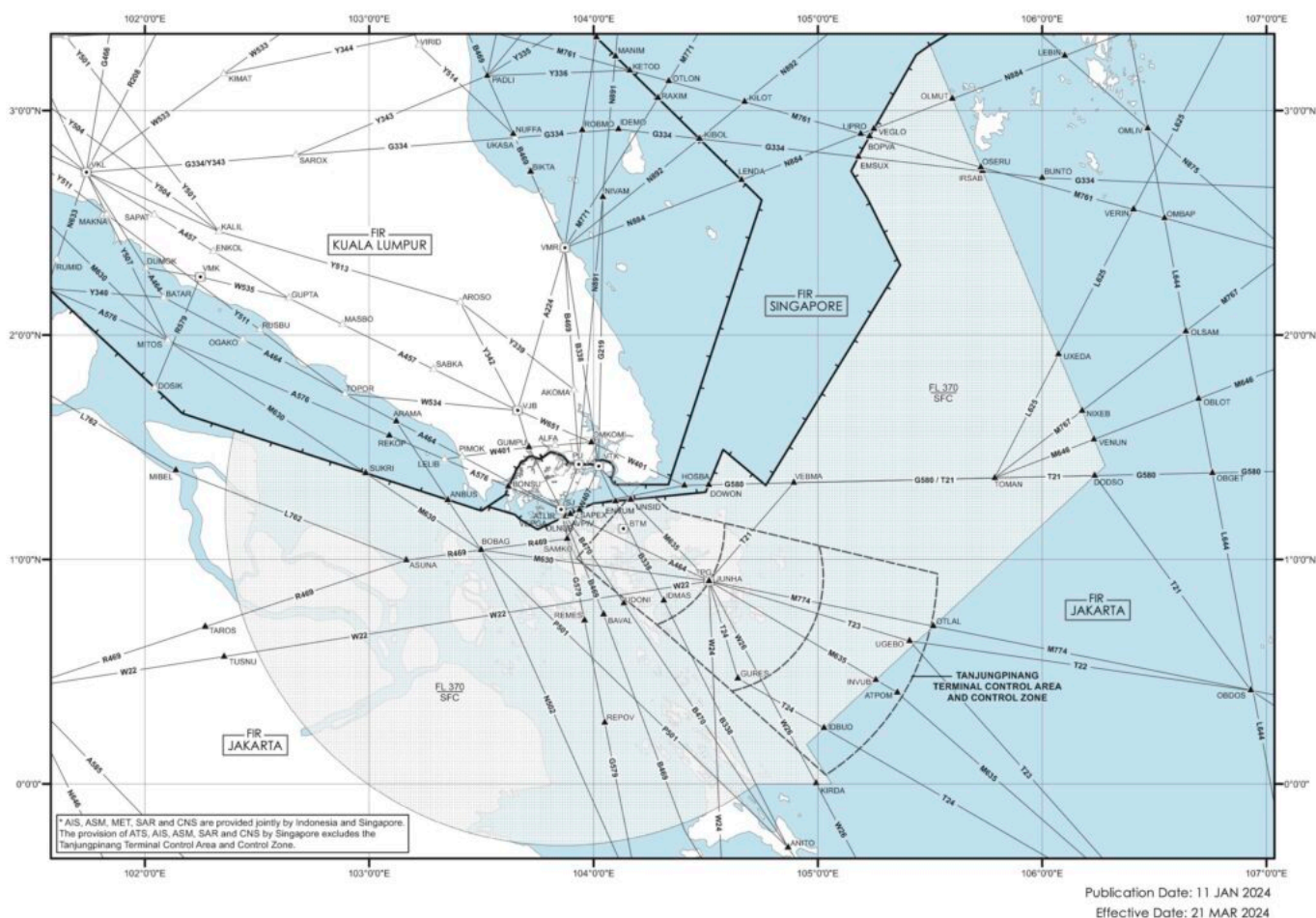
NAT Conundrums Volume IV: Contingency Procedures

David Mumford
25 September, 2024

Welcome to our 4th Volume of North Atlantic Conundrums!

Volume I covered the following three conundrums:

1. To SLOP, or not to SLOP?
2. What's the difference between the NAT Region and the NAT HLA?
3. Can I fly across the North Atlantic without Datalink?

Volume II covered these additional three:

4. Do you need to plot on Blue Spruce Routes?
5. Do we still fly Weather Contingency Procedures on Blue Spruce routes?
6. When can we disregard an ATC clearance and follow the contingency procedure instead?

Volume III looked at:

7. GOTA airspace.

And this post, Volume IV, looks at NAT Contingency Procedures – not those related to weather issues (which are well-known and described in the regs without the risk of misinterpretation), but those related to <u>times when you need to deviate from your ATC clearance</u> (due to comms issues, turbulence, depressurization, engine failure, immediate diversion, and other emergency situations).
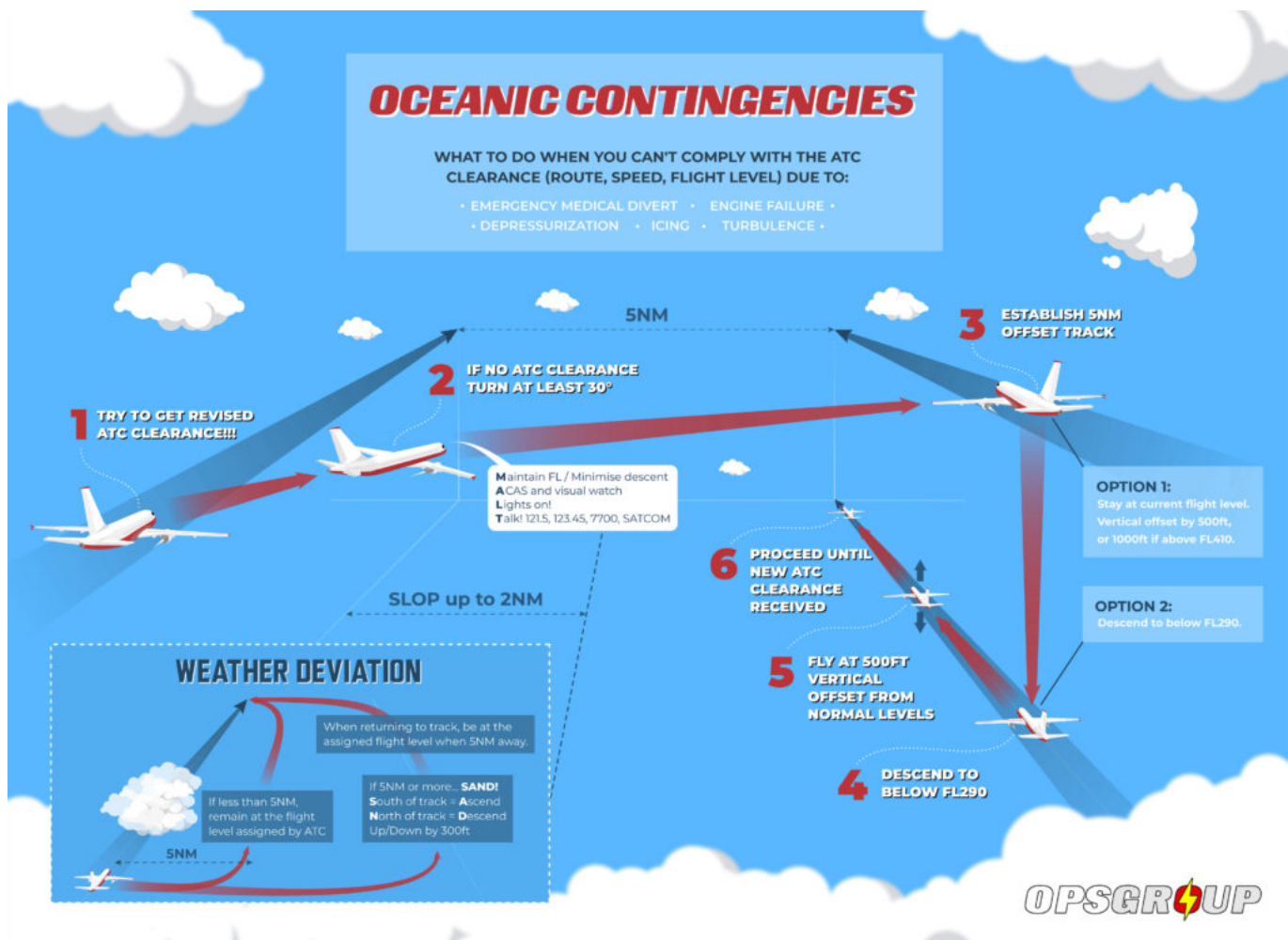
What are in-flight contingency procedures on the NAT, and which regulation governs them?

These are established to address situations where aircraft may encounter difficulties or emergencies while operating in the NAT airspace. They are primarily governed by the ICAO Document 4444, which outlines regulations for air traffic management practices and procedures. In this article, **we will focus specifically on non-weather related contingency procedures.**

I've heard of the NAT Doc 007. Is it the main reference for NAT contingency procedures?

Yes and no. While the NAT Doc 007 is a valuable resource for operators in the North Atlantic region, it's important to note that it explicitly states, "*this document is for guidance only.*" The primary regulatory framework for contingency procedures in the NAT remains **ICAO DOC 4444.**

Do I need a clearance to continue my flight?

Yes, you typically need a clearance to continue your flight. If an aircraft is unable to continue the flight in accordance with its ATC clearance, a revised clearance shall be obtained, whenever possible, prior to initiating any action.

Are there situations where I may not have a clearance?

There may be exceptional circumstances (such as emergencies or comms difficulties) where obtaining a clearance becomes challenging. In such cases, pilots should prioritize safety and follow established contingency procedures to ensure safe flight operations while seeking to obtain a revised clearance as soon as possible.

If I have already reported a contingency situation and subsequently receive a clearance, should I always follow the new clearance?

Yes, if you have been issued a clearance, you should adhere to it as long as it is safe to do so. If the new clearance is not safe, request an alternative clearance from ATC. Safety should always be the top priority.

If I have not yet been able to obtain a clearance, what should I do?

The procedure changed on the NAT in 2019, and then became the global standard in 2020 – so there is now **one standard set of Contingency Procedures for all oceanic airspace worldwide** (well, almost all airspace – there are still a few places which have slight differences, although these will eventually get aligned):

Leave your cleared track or ATS route by initiating a turn of at least 30 degrees to the right or left, in order to establish and maintain a parallel, same-direction track or ATS route offset of 5 NM.

Once established on a parallel, same-direction track or ATS route offset by 5.0 NM, you have two options:

1. Establish a 500 ft vertical offset (or 1000 ft if above FL 410) from the usual flight levels, and proceed as required by the operational situation, or if an ATC clearance has been obtained, in accordance with the clearance.
2. Descend below FL 290, and establish a 500 ft vertical offset from those flight levels normally used, and proceed as required by the operational situation or if an ATC clearance has been obtained, in accordance with the clearance.

The first rule is straightforward, involving manoeuvring to navigate between significant traffic operating in the North Atlantic High-Level Airspace (NAT HLA) by adjusting altitude with a 500 or 1000 feet offset before making a turn. **However, the second rule, when maintaining altitude is not feasible, can sometimes be misinterpreted.**

Why is the rule of descending below FL290 sometimes misunderstood?

The current wording of **ICAO Doc 4444** can sometimes lead to confusion, as it may imply that aircraft must first descend to establish a 500 ft vertical offset before making any lateral deviation. **This is not the intended interpretation.**

This misinterpretation was perpetuated by the **2023 version of the NAT Doc 007** (version 2023-1), which said: *"descend below FL 290, and establish a 150 m (500 ft) vertical offset from those flight levels normally used, **then proceed**…"*. This wording inadvertently supported the misconception by introducing the word "then" implying a strict sequence in the procedure.

The new 2024 version of the NAT Doc 007 (version 2024-1), which becomes applicable in March 2024, has been corrected, replacing the word "then" with "and", in line with ICAO Doc 4444.

How should it be understood?

The purpose of updating the contingency procedures in Doc 4444 was notably to provide a clear and effective way for aircraft to safely navigate and disengage from OTS (Organized Track System) with adjacent and nearby PBCS tracks without the risk of collisions. This is achieved by offering two primary options:

1. Using vertical offsets; or

2. In cases where maintaining altitude becomes impractical and to mitigate the risk of conflicts with the majority of traffic, which is located within the NAT HLA, descending below FL 290 before diverging.

As a result, depending on the situation, **lateral divergence can be initiated as soon as FL 290 is crossed during descent**, without the prior obligation to establish first at a potentially low FL offset before proceeding with the divergence.

In cases of **depressurization** requiring a descent to lower levels, or an **engine failure** necessitating a descent to lower levels depending on ETOPS speed, it may be preferable to initiate the turn as soon as the aircraft passes FL 290 when the alternate airport is located behind. **This helps save valuable time**, approximately 10 minutes, in returning to the same point as when crossing FL 290, especially in emergency situations.

In other circumstances (like when the alternate airport is located ahead), **a pilot may elect to establish the vertical offset first.**

The Doc 4444 regulations **allow for both of these courses of action.** Moreover, it's worth noting that the fuel planning for critical ETOPS scenarios typically does not account for continuing for a long time in the wrong direction before initiating divergence.

How do I know that this is the correct interpretation?

Because we asked ICAO.

They told us that after reviewing all the working papers, it's clear that **the intent is focused on getting below FL290 before doing anything (if possible).**

We also received confirmation that the SASP secretary, the ATM ops panel secretary, and the Flight Ops panel secretary had all discussed the issue and had agreed that the interpretation provided was correct. This does not reflect a specific panel viewpoint but rather a consolidated ICAO Secretariat view of the interpretation.

While it is preferable, given favorable conditions, to be at the offset level before initiating a turn (as this minimizes the potential for conflicts with other aircraft operating on adjacent tracks, providing some vertical 'separation' before turning across parallel tracks), **the primary emphasis remains on descending below FL290.** This priority is clarified in Doc 4444 Note 2 to 15.2.3.2(a) :

"Note 2.— Descent below FL 290 is considered particularly applicable to operations where there is a predominant traffic flow (e.g. east-west) or parallel track system where the aircraft's diversion path will likely cross adjacent tracks or ATS routes. A descent below FL 290 can decrease the likelihood of conflict with other aircraft, ACAS RA events and delays in obtaining a revised ATC clearance."

Ultimately, in emergency situations where it becomes absolutely necessary to deviate from the rules, it's down to the pilot-in-command to assess the validity of an immediate diversion in consideration of the risk of conflict with nearby aircraft in the high-level oceanic airspace. As ICAO Annex 2 says:

"The pilot-in-command of an aircraft shall have final authority as to the disposition of the aircraft while in command... the pilot-in-command may depart from these rules in circumstances that render such departure absolutely necessary in the interests of safety."

Key takeaways

In non-weather contingency scenarios, once you're established on a parallel, same direction track or ATS route, offset by 5 NM, there are two cases to consider:

- If you can maintain altitude, adjust your altitude by 500 or 1000 feet and then make a lateral turn to insert yourself between the traffic in the NAT-HLA.

- If maintaining altitude is not possible, descend below FL290 while continuing your descent toward a 500 feet offset, allowing you to diverge beneath the traffic in the NAT HLA.

In cases where maintaining altitude is not feasible, there is **no obligation to first establish an offset level before initiating divergence once FL 290 has been crossed during descent.**

With any luck, future versions of Doc 4444 will make all of this more explicit, in order to avoid various misinterpretations!

Mexico Permit Chaos: New Rules Explained

David Mumford
25 September, 2024

Key Points

- **From 1 Jan 2024, Single Entry Permits and Multiple Entry Permits for private flights have been replaced by the Single Entry Authorization (AIU).**

- **This AIU is valid for 180 days. With it, you can fly to Mexico as much as you like during this timeframe, and can do as many internal domestic flights as you want.**

- **You should apply for the AIU at least 2 days prior to the flight.**

- **Before the AIU can be issued, they Mexican airport you're flying to must obtain the authorization number from AFAC Headquarters in Mexico City. Timeframe for this is varying between 5 minutes to 2 days.**
- **These changes only impact private flights. Rules for charter flights work the same as before (i.e. you get a blanket charter permit).**

All these recent changes to permit procedures have been causing **stress and delays for ops to Mexico.** Before we get stuck into all the painful details, let's begin with a story...

A Cautionary Tale

*I just completed my first trip to **MMSL/Cabo San Lucas** since the new procedures came into effect, and thus needed the new permit. I use the local FBO for all of my permit applications, etc. **All paperwork was submitted and accepted days in advance.** This FBO is unquestionably one of the best that I ever use.*

*When I landed, they said **"we now wait for Mexico City to issue your Special Use Permit which they will only do after landing".** I suggested that my passengers (family and friends) go on to the hotel in case it took a little while. Good decision.*

*While sitting in the FBO waiting, I started to chat with other waiting crews. **One crew had been waiting for 3 hours already**, another crew was down for 2 hours.*

*The FBO manager indicated that **the new Mexican permit process has been total chaos** since it went into effect with huge delays. In the end, I waited 3 hours, and then was told to come back the next day.*

*As I left, one crew was still waiting. They had done a part 135 drop-off and had planned to head back to the US. They had been **delayed so long that customs at their US destination airport was closed**, and they couldn't reliably file a return eAPIS into the US because they didn't know their departure time (and you have to give the US at least one hours notification).*

*Hopefully, the new permit process settles down in the weeks ahead, but in the meantime, crews should be ready for a **many-hour or overnight delay.** Another pilot who flies regularly into Mexico told me that his delay (at a different airport) was less than 30 minutes. So, your mileage may vary, but in the meantime we all have to anticipate some delays.*

The Full Story

Thanks to Rick Gardner of CST Flight Services for the report that follows. CST Flight Services provides a wide range of international trip support services in Mexico, Central and South America, The Bahamas and the Caribbean. You can contact them for more info at: customersvc@cstflightservices.com

Ancient History

To understand the impact that the recent change to Mexico's entry procedures has had on private aircraft arrivals, one has to understand the history of how foreign private aircraft have been allowed to enter Mexico in the past.

For well over 20 years, Article 29 of Mexico's Civil Aviation law decreed that foreign (non-Mexican) aircraft could enter Mexico by landing at an official international Airport Of Entry (AOE) in Mexico and obtaining a **Single Entry Authorization** (subsequently called the single entry permit) or a **Multiple Entry Authorization** (subsequently called the multiple entry permit).

In 2014, a Mandatory Circular (CO SA 02/14 R1) was generated that updated the procedures and

documents required for authorizing the issuance of a single, or multiple, Entry Authorization. This circular was a heavy-handed intent to address **illegal charters and illegal cabotage in Mexico** which caused great confusion because it inserted confusing procedures for recording, and updating, the list of passengers authorized to fly on board a private aircraft and it eliminated an essential federal document that was relied upon by not only Mexican Civil Aviation officials but also by Mexican Immigration and by Mexican Customs.

The fallout of this new procedure resulted in **several Mexican AOE's being unable to receive international flights for many month**s while the issues were resolved but eventually work-arounds were found and things settled down despite the confusing procedure.

Although tweaked periodically, Article 29 of Mexico's Civil Aviation Law remained unchanged until May 05, 2023 when the entire Civil Aviation Law received a major update in many areas. Amongst the many changes made in the new version of the Law, **the concept of "single entry" and "multiple entry" authorizations were eliminated** and the ambiguous phrase "corresponding authorization" was inserted.

December 2023 changes

On December 27, 2023, 4 days before the end of the year, an internal AFAC document (Oficio 4.1.2.4197) was published to all of the Civil Aviation offices at Mexico's AOEs informing them that a **new procedure was being issued for the authorization of private aircraft entering Mexico.** This internal document specified the following:

- This internal document had a validity of 180 days.

- The changes to how entry authorizations were to be handled would go into effect January 1, 2024.

- It clarified that the reference to a Single Entry Permit and a Multiple Entry Permit were not correct and contrary to law and that the concept of a "Single Entry Authorization" (Autorización de Internación Única – AIU) was being adopted.

- That the AIU would be valid for 180 days from the date of issuance.

- That during the 180 day period, aircraft could freely travel in Mexican territory in a manner similar to the prior Multiple Entry Permit.

- That to issue an AIU the foreign operator needed to present their request for an AIU at least 2 days before their planned arrival in Mexico.

- That the Civil Aviation officials at the AOE could no longer unilaterally process an entry authorization but rather needed to request an AIU authorization number from Civil Aviation headquarters in Mexico City before the AIU could be issued. The request for the AIU number must be sent via email to a central email address and accompanied by:
    - Make of aircraft
    - Model of aircraft
    - Registration (Tail) number
    - Number of crew
    - Number of passengers
    - Name of Civil Aviation Inspector in charge of the AIU request
    - Name of Civil Aviation Comandante (or acting representative) who approved the AIU

      request

-     ○ The request needed to be emailed to a central email address in Mexico City

- As a measure of added security and due to different legal "issues", a Layout Of Passenger Accommodations (LOPA) needed to be presented.

- That for additional guidance on how the authorizations should be issued, AFAC officials needed to refer to the confusing 2014 Mandatory Circular (which was created for Entry Permits, which are now prohibited) until a new Circular could be published.

Confused? You are not alone.

January 2024 onwards

Almost immediately, there was an outcry about what was indicated, and not indicated, in the new procedure such as:

- Had the AFAC headquarters in Mexico City calculated how many aircraft arrive in Mexico per day and ensured that they had the email systems and staffing required to receive and process requests and issue the AIU authorization number for all AOE's in Mexico?

- How long would it take to get the authorization number?

- Many aircraft don't have the luxury to provide the 2-day required notification. (This was unofficially quickly watered down to a 2-day recommendation.)

- The Authorization is NOT VALID without the authorization number provided by the central AFAC headquarters.

  - ○ What if an aircraft needed to make a quick turn and depart Mexico before the AIU was issued?

  - ○ What if an aircraft needed to continue on to another airport in Mexico before the AIU was issued?

Almost immediately, we saw a **divergence in how each of these scenarios was being addressed** and how the new procedures were being implemented across the many Mexican AOE's across the country. Amongst the most notable issues we have seen are:

- It has been clarified that aircraft that were already in Mexico under the old Single Entry Permit that was issued in 2023 could remain in Mexico but needed to depart before those permits expired.

- The time to obtain an AIU authorization number was taking from **several minutes to multiple days** with no evident criteria for what made one request take longer than another.

- If the AIU authorization number is not received, some airports were **allowing the aircraft to depart but without a valid AIU.** This means that if they make a subsequent international flight to another Mexican airport, they will be treated as a new arrival and be obligated to **process yet another AIU** and pay the fee again because the AIU they had requested on their previous trip was never received.

- At some airports, flights wanting to fly on to another Mexican airport were approved on a discretionary basis by the local AFAC comandante with the requirement that they return to the

original AOE where they entered the country.

- Aircraft that had been issued an AIU and reentered Mexico with **different crew and/or passengers** are being required to process a new AIU.

- Some airports are requiring a **picture of the inside of aircraft, in addition to a LOPA**, in order to approve an AIU. Without it, approvals are delayed.

- Some airports require a **picture of the exterior of the aircraft** in order to approve an AIU.

- Some pilots who had completed the forms to request an AIU left Mexico **believing they had received an AIU** when all they had was the request form (they are all in Spanish).

One always has to look for a bright side to things, and the one bright side of this new procedure is that it resolves an issue that had plagued the old Multiple Entry Permit which expired on December 31, 2023.

Aircraft operators who entered Mexico with a Multiple Entry Permit who had an AOG at the end of December or who wanted to spend New Years in Mexico could face severe fines if they did not remove their aircraft from Mexico before their permit expired. **With the new AIU, you always have a 180 day window for its use with multiple entries during that time.**

What now?

At the present, there is a lot of **confusion, frustration and miscommunication** at all levels within the AFAC as well as at airports and FBO's in Mexico. The implementation of the AIU approval procedures will remain in flux while AFAC headquarters, regional comandantes and airport comandantes address the issues and come up with a better way to handle this.

In the meantime, **expect some turbulence ahead** – have pictures and LOPA's, expect to have to pay multiple times for AIUs if you travel to different airports in Mexico and expect possible delays. **The good news** is that the beaches are still nice, the food is still delicious, the people are still friendly and the beer is still cold.