

Since we are not able to attend the meeting and respond on site for the meeting discussion issue, here, we send the email to express our comments on the WP 10 which provided by Secretariat.

1. China generally supports the structure and direction of WP10 (APAC Seamless Draft Plan), which provided by the Secretariat, and thanks for the great efforts on developing this draft plan.
2. China supports the proposal on ASBU implementation and prioritizes in the Draft Plan. And it is recommended that the implementation of ASBU B0 modules should be the primary focus of the Plan while taking account to the recommendations on the subject of ASBU regional implementation during the ICAO ANConf/12.
3. We support most of the items in the Preferred Airspace and Route Specification (PARS) and the Preferred ATM Service Level (PASL). But according to the TOR of APSAPG, the Plan should "...determine the key and minimum requirements for seamless ATM...", but in the current Draft Plan, PARS and PALS are defined as "Preferred" instead of "Minimum" requirements, therefore it is necessary for the Secretariat to clarify the reasons for alter SARS and MASS in Draft 0.5 into PARS and PASL.
4. It is noticed that there are many Expectations for Aerodrome Operation, Airspace Operation, ATM system, Civil/Military Coordination etc. in PARS and PALS, which are quite detailed. On the other hand, there are few sentences to explain how to benefit the ATM operational performance and harmonization of APAC region consequently, if these expectations are met. We think that it might be necessary to add some reference and decisions that these Expectations are depend on to help the potential audience of the Plan, such as high-level decision-makers and other stakeholders, to understand the benefits of bring the PARS and PALS into reality.
- 5 It might cause some confusion that when "All the airspace (aerodrome)..." and "as far as practicable" appears in same sentence. And it may also decrease the confidence on the feasibility of the plan.
- 6 It is noticed that the Plan had categorize the airspace. We do not know that if this categorization is based on sufficient evidence. Meanwhile, we have the concerning on following issue:
  - a. If there will be some sectors of ATS route can fit neither Category R nor Category S?
  - b. If there will be some sectors of ATS route can both fit Category R and Category S?
  - c. Is it appropriate to use the same specification for all the sectors in the same category?
7. It is necessary to clarify the definition of high-density airport.
8. It is not recommended that Future Concept to include Space Based Surveillance, taking account to the discussion on this subject during ANConf/12.
9. We are studying on the Draft Plan in a very careful manner and will propose a more detailed feedback on it. Taking account to the case of China, we will have to collect comments among a large scale of

stakeholders, which will take more time than other States. Please understand that and release the latest draft that adjusted based on the comments collected in APSAPG/3 on the website as soon as possible.