



*International Civil Aviation Organization*

**The Third Meeting of the Regional Airspace Safety Monitoring Advisory Group  
(RASMAG/3)**

Bangkok, Thailand, 6 – 7 June 2005

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**Agenda Item 5: Provision by States of safety related data**

**NON SUBMISSION BY STATES OF SAFETY RELATED DATA**

**SUMMARY**

This paper highlights the difficulties being experienced by the Regional Office and regional RMAs in respect of the non provision of safety data by States, in contravention of ICAO Annex provisions.

**1 INTRODUCTION**

1.1 RASMAG/2 (October 2004) was concerned that some States had failed to fulfill their obligations towards ICAO safety requirements for ongoing operation of RVSM, noting a number of disturbing issues that had been identified by MAAR and PARMO that required urgent follow up:

- a) missing traffic sample data;
- b) missing large height deviation reports;
- c) incomplete and non-reporting of State approvals registry data; and
- d) incomplete information on follow-up monitoring of aircraft height-keeping performance in accordance with the minimum monitoring requirements.

1.2 RASMAG/2 recognized that these problems should be made known to State safety authorities to reinforce the need for due diligence in their safety management programmes and to fully cooperate with the regional RVSM monitoring programme. Accordingly, RASMAG/2 prepared a draft letter highlighting these concerns and requesting the immediate submission of safety data, to be sent to States by the Regional Office.

**2 DISCUSSION**

2.1 A copy of a generic letter of the type transmitted by the Regional Office in respect of the RASMAG/2 safety concerns has been reproduced as **Appendix A**. Regional office letters of this type were transmitted during early December 2004 to 13 States of the Asia and Pacific Regions who were identified as not having submitted data in accordance with the requirements of approved RMA's.

2.2 In many instances, appropriate safety data was provided as a result of this letter and other follow up actions taken by the Regional Office and concerned RMAs. However, in some instances, safety data has still not been provided. Despite RASMAG and the Regional Office informing the States that had not submitted the required data as described above and requesting them to submit as a matter of priority, MAAR was still not in receipt of sufficient data to undertake a

suitable safety analysis in support of changes proposed to the South China Sea FLOS arrangements, resulting in the postponement of the RVSM FLOS review meeting originally scheduled for April 2005 until February 2006.

2.3 The need for the transmission of a letter of this type was identified as a result of the non compliance by some States with requests from RMAs appointed by APANPIRG for safety data. The follow up actions that have had to be continually undertaken by the Regional Office and regional RMA's in an effort to ensure States provide suitable safety data in respect of their responsibilities under Annex 11 - *Air Traffic Services* provisions is excessive and cannot be sustained.

2.4 Amendments to Annex 11 with effective date November 2005 introduce an ICAO Standard that requires States to establish a monitoring programme for the monitoring of aircraft height keeping performance in RVSM airspace. Complementary provisions have been added to Annex 6 – *Operation of Aircraft* which specify the responsibility of the relevant State authority to take prompt and appropriate action if the monitoring results indicate that the height keeping performance of a particular aircraft or an aircraft type group exceeds prescribed limits.

2.5 The non provision by States of appropriate safety data in a timely manner in accordance with ICAO provisions and the requirements of RMAs appointed by APANPIRG means that the safety performance of the regional airspaces in which reduced separation has been implemented cannot be fully demonstrated.

### **3 ACTION BY THE MEETING**

3.1 The meeting is invited to:

- a) note the information contained in this paper, and
- b) identify methods to ensure the effective and efficient provision of appropriate data by States in accordance with ICAO provisions and the requirements of MAAR and PARMO as the authorized regional RMAs for the Asia and Pacific Region.

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**Generic Example of RASMAG/2 - Regional Office Safety Letter**

Dear Director General of Civil Aviation,

**Submission of RVSM safety monitoring data to the Regional Monitoring Agency**

I would like to bring to your attention and for urgent action the need to update the RVSM safety assessment for the airspaces of the West Pacific and South China Sea areas. As you will be aware, ICAO requires that the implementation and ongoing operation of RVSM is carried out in accordance with ICAO requirements as specified in the *Manual on Implementation of 300 m (1 000 ft) Vertical Separation Minimum between FL 290 and FL 410 Inclusive* (Doc 9574). Essential to this programme are the ongoing safety monitoring activities that provide safety oversight of RVSM operations through periodic updates of safety assessments and compilation and maintenance of the global approvals registry of aircraft and operators approved by States to conduct RVSM operations.

The Asia and Pacific Air Navigation Planning and Implementation Regional Group (APANPIRG) had assigned the RVSM Task Force with the responsibility for the planning, implementation and follow up of RVSM in the Asia and Pacific Region. Please also note that the Regional Airspace Safety Monitoring Agency (RASMAG) was established by APANPIRG/14 (August 2003) under Decision 14/48 to oversee and review airspace safety monitoring activities in the Asia and Pacific Region. To meet the RVSM safety monitoring requirements in the Asia Region, APANPIRG/14 appointed the Monitoring Agency for the Asia Region (MAAR) operated by AEROTHAI, Thailand as the Regional Monitoring Agency.

As an integral component of the RVSM implementation activities, the RVSM Task Force established requirements for the periodic update of the safety assessments for the Western Pacific and South China Sea RVSM operations, and it was agreed that the safety assessment would be updated in September 2004 using traffic sample data (TSD) for July 2004. Please note that to date, the TSD for the XXXXXX FIR has not been received by MAAR. Therefore, you are urged to submit this data on the template provided (see **Attachment A**) to MAAR as soon as possible by email or letter.

I would like to remind your Administration that subsequent to implementation, the continued operation of RVSM and other reduced separation minima require ongoing safety monitoring services to be provided. Accordingly, States and ATS providers are required under Annex 11 provisions to participate in and establish airspace safety management programmes. In regard to ongoing monitoring, MAAR requires up to date information on all aircraft registered by your State approved to operate in RVSM airspace and any changes to the approvals registry, to be submitted on MAAR form F2 (**Attachment B** refers). All MAAR forms and further information are available from the MAAR website at <http://www.aerothai.co.th/maar/>

We would appreciate the cooperation of your Administration to ensure that the ICAO safety requirements for continued RVSM operations in the region are being met.

Yours sincerely,

L. B. Shah  
Regional Director