Agenda Item 3: SAT Collision Risk Assessments (CRA)

a) ARMA, CARSAMMA, SATMA Activities

POTENTIAL IMPACT OF RMACG/21-WP/12 ON PBCS MONITORING ACTIVITIES IN THE SOUTH ATLANTIC AREA

(Presented by CARSAMMA)

SUMMARY

This paper presents RMACG/21-WP/12 and provides preliminary information on its potential implications for PBCS monitoring activities in the South Atlantic area.

Strategic goals	A - Every Flight is Safe and Secure C - Aviation Delivers Seamless, Accessible, and Reliable Mobility for All
References	• ICAO Doc 9869 — Performance-based Communication and Surveillance (PBCS) Manual. • ICAO Doc 10063 — Manual on Monitoring the Application of Performance-based Horizontal Separation Minima, Second Edition, 2021. • RMACG/21-WP/12 — RMA Support to Regional PBCS Monitoring Programs, 2026. • RMACG/21 — Draft Summary of Discussions, Brussels, Belgium, 8–12 June 2026 (unpublished draft).

1. Introduction

1.1 Regional Monitoring Agencies (RMAs) support regional PBCS monitoring programs by receiving reports of non-compliance with RCP 240 and RSP 180, maintaining RCP/RSP authorization information, verifying compliance with State PBCS requirements, and exchanging authorization information among RMAs.

1.2 RMACG/21-WP/12 identified difficulties with some functions, particularly in collecting and maintaining RCP/RSP authorization information and using it to ensure compliance with State PBCS requirements.

1.3 The issue is also relevant to the South Atlantic (SAT) area, as PBCS monitoring arrangements for its oceanic operational environment continue to develop. This paper presents the main issues raised by

RMACG/21-WP/12 and considers their potential implications for CARSAMMA and for PBCS monitoring involving SAT-participating FIRs.

2. Discussion

RCP/RSP authorization information

2.1 RMACG/21-WP/12 notes that, unlike operations requiring specific approval, RCP and RSP operations do not require specific approval or authorization documented in a standardized format. Consequently, States use different methods to record RCP/RSP capabilities and authorizations.

2.2 According to RMACG/21-WP/12, some States provide specific RCP/RSP approval information, while others use different mechanisms, including fleet-based records. Extracting this information may require significant manual processing and may still result in incomplete RMA authorization databases.

2.3 This creates a particular concern when RMA authorization databases are used to verify whether aircraft filing PBCS capabilities comply with State authorization requirements. An aircraft not identified in an RMA database cannot necessarily be considered non-authorized if the underlying authorization information is incomplete.

Proposed change to RMA support

2.4 RMACG/21-WP/12 proposed removing from the relevant RMA terms of reference tasks related to following up on non-approved aircraft identified in PBCS airspace and verifying compliance with State PBCS requirements. It also proposed reviewing whether RMAs should continue to:

a) receive and maintain RCP and RSP approval/authorization information; and
b) exchange such information between RMAs for the purpose of verifying compliance.

2.5 It is important to note that WP/12 did not propose discontinuing the RMA role in receiving PBCS performance non-compliance reports. A distinction should be maintained between:

a) monitoring actual PBCS performance, including identification and reporting of RCP/RSP under-performance; and
b) verifying PBCS authorization status based on information maintained by RMAs.

Preliminary information from the RMACG/21 discussions

2.6 An unpublished draft Summary of Discussions indicates that RMACG/21 discussed the difficulties identified in WP/12 and records a recommendation for RMAs to consider amending their terms of reference to remove tasks related to verifying PBCS approvals. The draft also records endorsement of the proposal by NAT CMA and MAAR.

2.7 The draft indicates that, because specific RCP and RSP approvals are not required and State recording methods are not standardized, maintaining a comprehensive and accurate RCP/RSP authorization database at the RMA level may not be practicable.

2.8 NAARMO reported that maintaining such information was resource-intensive and likely to result in an incomplete representation of RCP/RSP authorization status.

2.9 Of particular relevance to both the CAR/SAM Regions and the SAT area, the draft records that CARSAMMA advised RMACG/21 of the forthcoming implementation of PBCS within its area of responsibility and requested RMA assistance to promote standardization. The matter may also affect monitoring arrangements applicable to the Atlantico FIR and SAT operations involving CARSAMMA.

2.10 Since the RMACG/21 Summary of Discussions has not yet been published, these observations should not be interpreted as a finalized amendment to RMA responsibilities or to existing CAR/SAM and SAT-related PBCS monitoring arrangements.

Potential impact on PBCS monitoring

2.11 Monitoring actual communication and surveillance performance remains necessary, including the analysis of operational data, identification of RCP/RSP under-performance, regional aggregation of results, and transmission of information to the appropriate authority.

2.12 The potential change concerns the use of an RMA-maintained authorization database to determine whether an aircraft or operator is authorized to file and use PBCS capabilities.

2.13 ICAO Doc 9869 states that the State of the Operator or State of Registry should establish a means to verify that operators filing PBCS capabilities are authorized. The State also has a role in addressing reported RCP/RSP non-compliance and ensuring corrective action.

2.14 This could result in greater emphasis on the following allocation of functions:

a) ANSP/local monitoring program: collect and analyze communication and surveillance performance data and identify RCP/RSP under performance;
b) regional PBCS monitoring/RMA: receive, collate, analyze and exchange under-performance information and transmit relevant information to the responsible State; and
c) State of the Operator/State of Registry: verify authorization status and undertake appropriate oversight and corrective action.

2.15 Such an arrangement would not eliminate PBCS compliance monitoring but would distinguish technical and operational performance compliance from regulatory authorization verification.

Potential implications for PBCS monitoring in the SAT area

2.16 The principal potential impact on the SAT area is not a reduction in PBCS performance monitoring, but a possible change in the functions performed by CARSAMMA and other RMAs in maintaining PBCS authorization information and verifying authorization status. This distinction is particularly relevant where flights operate across FIRs supported by different RMAs.

2.17 SAT-related procedures and coordination arrangements may therefore need to clearly identify responsibilities for:

a) monitoring actual RCP/RSP performance;
b) identifying and reporting PBCS under-performance;
c) regional coordination and exchange of under-performance information; and
d) verification by the responsible State of PBCS authorization status.

2.18 Where authorization information cannot be demonstrated to be complete, the absence of an aircraft or operator from an RMA database should not, by itself, be considered evidence that the operation is not authorized.

2.19 ICAO Doc 10063 describes RMA functions involving the maintenance of PBCS authorization information and the comparison of authorization data with PBCS capabilities filed in flight plans. Any finalized change in the RMA role may require corresponding clarification of applicable ICAO or regional guidance.

3. Action by the Meeting

3.1 The meeting is invited to:

a) note the information presented;

b) consider its potential implications for PBCS monitoring in the South Atlantic area; and

c) provide direction as deemed necessary.

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