ATS Service framework improvements

1. Remove references to RPT from the framework, particularly with reference to aerodrome categories in schedule 1 and replace with IFR. There is no definition of RPT in framework or what constitutes RPT so not an easy process to determine. From a data collection point of view, airlines do not file a flight plan indicating they are (or aren't) RPT, they file a flight plan based on flight rules. The linkages from the service framework should be to the pricing framework and charges are based on flight rules (IFR/VFR) not RPT. Generally speaking IFR will equal RPT so I believe a worthy substitute and more in line with staffing/pricing for the services offered.

2. In the aerodrome categories in schedule 2 introduce a component around hours of service which links directly to staffing models. At the moment it is the movement numbers which appear to drive the specified shifts for service but it is the span of hours which can also drive the outcome. For example, an aerodrome can have low movements numbers indicating a sub-category of D, but if those movements occur outside of a span of 14.25 hours and given the current labour rules in place, would require sub-category C staffing levels which would have obvious staffing and cost implications.

3. In schedule 2 the table references continuous hours of 14.5 hours – this needs to be updated to 14.25 hours to align with labour ruleset but furthermore should have a more defined mechanism for what to do when operations are outside those hours – which is largely silent in framework – there is only a reference to paragraph in schedule 1 about what to when aerodromes do not fit into a category.

4. Have defined review mechanisms and variations to framework published. There are anomalies between the framework and current application where aerodromes are staffed at levels different to framework specified in schedules 1 & 2 – for example Queenstown. These may have been agreed at some point but with time and change of personnel these agreements may be lost – whereas publishing any variations to the framework will create a clear line of sight between traffic/price/staffing. This needs to include the mechanism which drives multi crew operations with respect to workload or other factors

5. Create a way to combine forecast and historic movement information to determine pricing. If we are only looking retrospectively at movements, all towers (except military contracted ones) would be solo watch (2 shifts per day) based on the last 12 months of data. The forecast is very different and if only retrospectively applied, Airways would be forever behind the 8 ball in workforce planning and also compromising safety staffing at a level not appropriate to the traffic at the time, but also not charging appropriately for the services offered.

6. Resolve the imbalance between airport opening hours and airline schedules and who pays. At present Airways staff to airline schedules, but airports have an expectation (at times) we will be there for all operating hours. Whilst more of a pricing framework item – having the airport contract the services from Airways (rather than airlines pay Airways for aerodrome service) would create alignment with staffing models and eliminate confusion.