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Association of European Airlines

Emerg 8/IV

Secretary General

Mr. François Lamoureux
 Director General
 EUROPEAN COMMISSION
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ACTION:

ECHEANCE:

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DG	ASS	BBA	BBA	AAE		ANK

April 8, 2005

Dear Mr. Lamoureux,

Through the Commission's website, DG TREN Services have organised a public consultation on the "TEN Transport Policy and Projects in the future" and have invited interested stakeholders to send their contributions by the end of March 2005.

The AEA has noted that aviation does not figure at all in the long list of priority axes identified in the document presented by DG TREN in January 2005. We believe that aviation should be accorded its rightful place in the general framework of the TEN-T. Therefore we would like to use the public consultation process to submit four proposals - a brief description of each is attached herewith.

These proposals relate to the financing of

- Security measures for all modes of transport, including aviation,
- The second phase of the SESAME strategy,
- The interoperability of ATM systems and,
- The air/ground data link services.

These aviation projects fit perfectly into the category of 'Horizontal Measures' which the Commission has asked the High Level Group to develop, since they improve the efficiency of the existing transport networks.

We ask DG TREN and the High Level Group to consider our proposals and to include them in the 'TEN Transport Policy and Projects in the future'.

Should you need any further information please do not hesitate to contact me.

Yours sincerely,

Ulrich Schulte-Strathaus

Ulrich Schulte-Strathaus

Copy to: Mr. Ben Van Houtte (DG TREN); Mr. Eckard Seeböhm (DG TREN);
 Mr. Roberto Salvarani (DG TREN); Mr. E. Thielmans (DG TREN)
 Mr. George Paulson (Eurocontrol)

Adria Airways, Aer Lingus, Air France, Air Malta, Alitalia, Austrian, bmi, British Airways, Cargolux, Croatia Airlines, CSA, Cyprus Airways, Finnair, Iberia, Icelandair, Jat Airways, KLM, LOT, Lufthansa, Luxair, Malev, Olympic Airlines, SAS, SN Brussels Airlines, Spanair, SWISS, TAP Air Portugal, Tarom, Turkish Airlines, Virgin Atlantic Airways.



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SECURITY PROJECT

The protection against terrorist attacks is the duty of public authorities and should therefore be financed by public funds/budgets rather than by the sectors and their users.

The AEA believes that the TEN-T funds could validly contribute to financing security measures for all modes of transport, including aviation, so as to avoid discriminatory treatment and ultimately distortion of competition between modes across Europe.

SECOND PHASE OF IMPLEMENTATION OF SESAME

Given the projected air traffic growth over the next decades and in order to improve European Air Traffic Control Management, the EC created the Single European Sky programme, thus providing the political framework for the establishment of a Europe-wide harmonized structure for the air transport sector.

The initial framework needs to be complemented by clearly-defined industry programmes related to ground and airborne systems. Such programmes should not only be looked at from a purely European point of view, as air transport also has continental and global dimensions, affecting neighbouring States and even neighbouring continents.

In this respect, the EC supports the creation of a European Air Traffic Management programme called SESAME, which was set up through an industry initiative comprising all involved stakeholders (airspace users, airports, air navigation service providers and Eurocontrol).

SESAME comprises two phases:

- the development phase: to develop an ATM Master Plan (2005-2007)
- the deployment phase: to convert the Master Plan into reality (2007+)

While the development phase is already clearly defined and in the final stages of preparation, the second phase has not yet been defined.

The AEA believes that TEN-T funds could validly contribute to financing the SESAME deployment phase, thus ensuring the vital transition from today's ATC to the new harmonized Air Traffic Management System.

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ATC INTEROPERABILITY

The primary objective of the SESAME project is the development of a fully harmonized ATM system from 2020 onwards, including the transition-phase. However, in the short-term clear measures need to be taken to accommodate air traffic growth within the existing ATC systems.

Under the Single European Sky umbrella, the EC has therefore entrusted Eurocontrol with the task of drafting implementing rules to make today's fragmented European ATC systems "interoperable", allowing shorter-term benefits such as optimised aircraft operations based on a harmonized ATC, thus reducing delays and the environmental burden.

It is obvious that such a beneficial concept should not end at the borders of the European Community and that it would create benefits for all if neighbouring States were included into this concept.

The AEA believes that TEN-T funds could validly contribute to financing the creation of a trans-European, interoperable ATC system by helping EU and neighbouring States/Air Navigation Service Providers to invest in and to align the development of their ATC systems with the defined interoperability rules.

AIR/GROUND DATA LINK

Eurocontrol's LINK2000+ plans and coordinates the implementation of operational air/ground data link services (CPDLC) over ATN for Air Traffic Management (ATM) in the core area of Europe over the period 2000 - 2010.

The objective of the programme is to reduce the workload of controllers and consequently to increase sector capacity. Simulations show that 11 % more sector capacity could be gained if 75% of all aircraft in a given sector are equipped with adequate air/ground data link systems.

The programme consists of a three-step approach: 1) pioneer airlines, 2) incentives and 3) an eventual mandate.

In this context, Eurocontrol is currently working on a European Notice of Proposed Rulemaking (ENPRM) to require airlines to be equipped with data link systems (eg Link2000+ capable avionics). It is expected that in the near future the EC Single European Sky Committee will give Eurocontrol a mandate to develop such an Implementing Rule for Data link Services.

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The costs of equipping aircraft with Link2000+ capable avionics are very high, thereby preventing most airlines from proceeding. Therefore, in order to accelerate equipage and the associated benefits, financial incentives in the form of a direct financial grant should be offered to airlines that equip aircraft before the mandatory equipage date.

Within the current ATC charging framework and under the 100% cost recovery principle, any financial incentives given to airlines will be recovered from the airlines at a later stage through the ATC en-route charges, thus neutralizing the incentives.

The AEA believes that the TEN-T funds could validly contribute, through financial incentives, to stimulating and encouraging airlines to equip their aircraft with Link2000+ capable avionics.