

**State Letter Attachment A:
Amendment to Annex 6- Part I**

Agreement/Disagreement	Referenced Text	Comment
Agreement with comments	XXXXX	Tracking must be considered as a high-level principle of operations within an air operator function rather than a criterion for a technology solution or a prescriptive statement of such requirements. As a performance-based solution the requirements should be left to the air operator to demonstrate compliance in a technology-agnostic manner.
Agreement with comments	XXXXXX Tracking Definition	Required in clear and unambiguous terms. We propose: “a ground based function that records, updates and maintains at standardized intervals, the time-based geographic position and level flown of an aircraft”.
Agreement with comments	“...shall track the position of the aircraft at least every 15 minutes for the portion(s) of the inflight operation(s) that is planned in oceanic airspace where ATS surveillance systems are not used for the provision of air traffic control service”	This Standard requires every Air Operator to be aware of and monitor those areas where ATS surveillance systems are used for the provision of ATS. Further, Air Operator tracking systems are used for tracking their own assets and do not necessarily contain an overlay of ATS surveillance services. This aspect should therefore be considered in developing the impact statement – should changes in the current air operator tracking systems be required. ICAO should also prescribe the necessary Standards to States to declare and promulgate those portions of Oceanic (and procedural) airspace not under direct surveillance in their respective State AIPs.
Agreement with comments	“When tracking the position of an aeroplane, the operator shall establish procedures to notify the appropriate ATS	In order for Air Operators to meet this Standard, such contacts for ATS units should be established and

	unit when the position of the aeroplane cannot be determined and attempts to establish communication are unsuccessful.”	clearly promulgated in State AIPs. This is particularly so given the variability and diversity of airline international and long-haul operations.
Agreement with comments	“In portion(s) of the inflight operation(s) that is planned in areas where ATS surveillance systems are not used for the provision of air traffic control service....”.	Similarly, as detailed above and in order to ensure compliance to the Standard, States must publish in their AIPs such areas where <i>air traffic control obtains aeroplane position information at greater than 15 minutes intervals</i> ”
Agreement with comments	<i>ATS surveillance system.</i> A generic term meaning variously, ADS-B, PSR, SSR or any comparable ground-based system that enables the identification of aircraft.	We propose to add ... “that enables the identification and tracking of aircraft”.