

GUIDANCE MATERIAL

FOR NON-AOC OPERATORS

ON ACHIEVING CONNECTIVITY OVER ATN/VDL MODE 2
TO SUPPORT ATC DATALINK SERVICES

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1. INTRODUCTION

The European Datalink Services Implementing Rule (DLSIR) [1] requires General Air Traffic (GAT) flights in accordance with Instrument Flight Rules (IFR) above FL285 in designated European airspace to be capable of operating Datalink Services (DLS), including Controller Pilot Datalink Communication (CPDLC), unless exempted.

The rule embraces both Air Transport operations and General Aviation. Most Air Transport operators will typically perform Aeronautical Operational Control (AOC) datalink communication by means of a commercial (contractual) arrangement with an Air-ground Communication Service Provider (ACSP), and access to DLS will be made available alongside their AOC service by their commercial ACSP.

However, some Air Transport Operators as well as most General Aviation operators do not perform AOC, so do not have an existing contractual relationship with an ACSP, and thus do not enjoy the same level of support and guidance in establishing connectivity to support DLS.

Today there are two ACSPs offering AOC services to Airlines (ARINC/Collins and SITA) and one ACSP offering only ATC services (ENAV).

The accommodation of such Non-AOC aircraft was foreseen at the outset of the technical and administrative design of the ATN/VDL network, under the principle that the transfer of any ATC datalink messages shall be covered by the ATC route charges (which fund ANSPs) and as such would not require additional charges from operators. Nevertheless, the absence of an existing relationship with an ACSP means that some additional steps (both technical and administrative) may be needed by Non-AOC operators to achieve the necessary connectivity to support DLS.

Following the first meeting of the Datalink Support Group (DSG1), a problem report was raised by EBAA (CRO-802, Connection to the DL networks & frequency tuning of users doing only ATS traffic) requesting support to clarify and resolve issues in relation to the connectivity of non AOC aircraft to the ATN/VDL network. These issues were further discussed in the DSG2 meeting. Some key concerns which have been expressed include:

- lack of clear documentation on how to connect a non AOC aircraft to the ANSPs
- difficulties for non AOC aircraft operators to configure their aircraft.

In the context of the follow up and support for the investigations under the Problem Report CRO-802, this document is aimed at operators of Non-AOC aircraft, to provide:

- relevant background on the design of the ATN/VDL network (Section 2)
- technical guidance on steps needed to achieve connectivity and access DLS (Section 3).

In addition, this document identifies potential issues that will require further discussion amongst stakeholders, including representatives of Non-AOC operators, ACSPs and ANSPs:

- non-technical issues to streamline connection to ATN/VDL networks and operation of DLS services by Non-AOC operators (Section 4)
- further steps proposed to address such outstanding issues (Section 5).

The scope of the document is limited to the use of the VDL subnetwork within the ATN infrastructure, since this is believed to be of greatest relevance to Non-AOC Operators, and the use of SATCOM is not addressed.

This version of the document is provided for the review of the relevant/interested stakeholders and will be used as the basis for exchanges and to request feedback for all sections and in particular for the potential issues that need to be addressed. Following consultation with and feedback from the stakeholders, a new version of this document will be developed focusing also in the analysis and evaluation of the options to address the identified issues.

2. BACKGROUND

2.1 ATN/VDL OPERATING PRINCIPLES

During early design of the ATN/VDL network, a number of principles were established to guide its development and evolution. These principles were stated initially in the Link 2000+ Network Planning Document (NPD) [2], and subsequently amplified with regard to Non-AOC operators by collaborative discussions with ACSPs and review by ANSPs.

The principles particularly applicable to Non-AOC operation, and reflected in the current deployment, are as follows:

A) ATC datalink services must be available to all airlines and operators, irrespective of whether or not they make use of AOC services (NPD-1).

Funding arrangements between ANSPs and ACSPs provide for ACSPs to carry ATN ATC messages without additional charge to both AOC and Non-AOC operators.

ACSPs will provide ATN/VDL service to support Non-AOC operators, but may do so only when certain requirements relating to qualification of avionics, agreements regarding liability, and other relevant matters have been satisfied. Specific technical requirements are listed in section 3.1 and contractual matters are discussed in section 4.1.

B) Dual coverage - the two existing commercial ACSPs (ARINC and SITA) provide a DLS-IR compliant ATN/VDL M2 datalink service throughout the entire DLS-IR application area, either directly or in cooperation with ANSPs for a given airspace (NPD-0).

This implies that an aircraft should not normally need to transfer between ACSPs in order to maintain ATN/VDL coverage while flying in the DLS-IR area. It cannot be ruled out that due to minor discrepancies in coverage, such transfers might occasionally arise, but they should be rare events.

It is technically undesirable for aircraft to transfer between ACSPs frequently, since this typically involves re-establishing a new IDRP Air-Ground Adjacency, which places a significant additional burden on the VDL link.

Note: ANSPs (e.g. ENAV) may also provide ATN/VDL M2 service, but this will be advertised on the VDL M2 link so as to appear as one or both of the existing commercial services.

- C) An ANSP shall connect directly with one or more ACSPs of its choice, and indirectly with all other ACSPs meeting the minimum Quality-of-Service requirements for the provision of ATC Datalink services in its airspace (NPD-2).**

This implies that all ACSPs offering coverage within an ANSP's airspace must provide a path to that ANSP, either directly (known as a Primary Provider), or indirectly via ground interconnections (known as an Alternate Provider). Conventionally, ACSPs advertise IDRP routes to 'All ATSC' (Air Traffic Service Communication) in recognition of this principle.

Accordingly the need should not arise for an aircraft to switch from one ACSP to another purely to achieve connectivity with any particular ANSP. As remarked earlier, it is undesirable for aircraft to switch between ACSPs due to the resulting exchanges and corresponding load imposed on the air-ground link.

There should be no need for a Non-AOC aircraft to be informed by technical means which ACSP is the Primary Provider in any given airspace. A Non-AOC aircraft should continue to receive ATN/VDL service supporting DLS from the ACSP to which it is already connected, even if it enters airspace in which that ACSP is no longer the Primary Provider.

If for any reason an ACSP is unable to provide service to a Non-AOC operator, the ACSP should either refuse a connection, or else disconnect the aircraft if a link already exists with that ACSP. In this circumstance, the Non-AOC aircraft should attempt to connect via another ACSP.

For this reason, and recognising that Non-AOC operators may fly a more diverse set of routes than scheduled Air Transport operators, Non-AOC operators are expected to configure their avionics to operate in a multiple provider configuration.

2.2 NETWORK ARCHITECTURE

The following figure is reproduced from the NPD [2] to illustrate the current ATN/VDL architecture supporting the principles described in the section above. It seeks to focus on the provision of end-to-end datalink services via interconnected ACSPs rather than ATN/VDL M2 coverage.

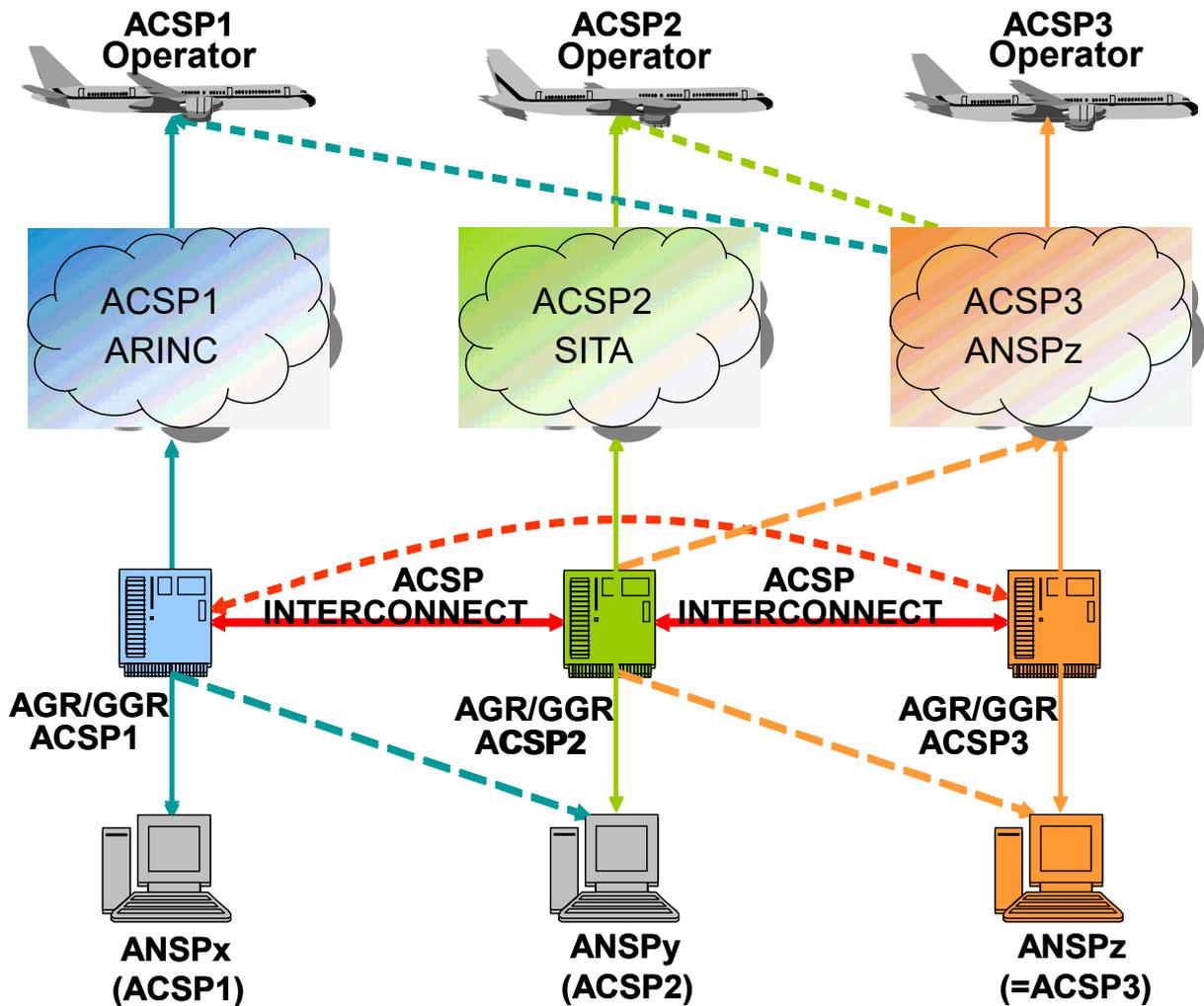


Figure 1: ATN/VDL Network Overview (ATC Datalink Provision)

In the above figure:

- ANSPx contracts with ACSP1 as its Primary Provider. ACSP2 offers coverage in the same airspace and thus acts as an Alternate Provider. Messages to/from aircraft connected to ACSP1 will be routed directly from/to ANSPx. Messages to/from aircraft connected to ACSP2 will be routed from/to ANSPx via the ACSP interconnection.
- ANSPy contracts with ACSP2 as its Primary Provider, with ACSP1 acting as an Alternate Provider. Message routing operates in an analogous fashion to that described above.
- ANSPz operates its own network, and hence operates as ACSP3. Subject to its contractual arrangements with the established commercial ACSPs (SITA and ARINC) its ground stations may advertise themselves as either SITA/ARINC or both (illustrated as dotted blue and green lines). Aircraft connected via ACSP3 will enjoy connectivity to all other ANSPs via the ACSP interconnections.

In some cases, an ANSP may elect to connect directly to two commercial ACSPs (e.g. the dashed blue line connecting ANSPy directly to ACSP1 as well as ACSP2), rather than a single Primary ACSP. In cases of direct connection to multiple ACSPs, the ANSP's own ATN Ground Router must determine which ACSP provides the most efficient communication path to the aircraft. Typically ACSPs do not advertise to ANSPs the ATN routes for individual aircraft, and so this latter decision is achieved based on the ADM field of the aircraft's NSAP address.

Note: For AOC airline operators, the ADM field identifies the operator, and hence can be associated with the operator's preferred provider in the relevant airspace. Some consideration may be necessary to determine how best to achieve the latter routing in the case of Non-AOC aircraft. This in turn would depend on the mechanism used to allocate the default provider to Non-AOC aircraft, as discussed in section 4.3.

3. TECHNICAL GUIDANCE

3.1 REQUIREMENTS FROM AIR-GROUND COMMUNICATION SERVICE PROVIDERS (ACSPs)

Both ARINC and SITA confirm that Non-AOC aircraft can currently connect to the ATN via their VDL Mode 2 networks.

As highlighted earlier, certain technical requirements must be satisfied by Non-AOC installations and operators in order for ACSPs to manage such connectivity effectively, including frequency transitions to/from the CSC. Specifically, ACSPs have advised that they will require

- the avionics to provide correct downlink XIDs in accordance with published standards

together with provision of the following information relating to each aircraft

- aircraft tail number
- aircraft ICAO address
- avionics configuration (VDR and CMU part numbers, and core software versions)
- preferred/default ACSP (further discussed in section 4.3)
- point of contact to alert operator in the event that ACSP detects an issue.

Note 1: This information is normally provided to the ACSP by AOC operators when establishing their contract for AOC service.

Note 2: Non-AOC aircraft often do not meet these requirements at present and in such cases ACSPs are unable to autotune them from the CSC, contributing to an increased load on the channel and potentially compromising the quality of service of the ATN connection.

Note 3: When the technical requirements above are satisfied, ACSPs are expected to manage frequency transitions for Non-AOC operators so as to maintain the quality of service at the required level.

3.2 CONFIGURATION OF AVIONICS

Configuration of avionics to support DLS by Non-AOC operators inevitably depends on the features of individual avionics, and so the guidance provided in this document is of a general nature.

In line with the ACSPs requirements covered in section 3.1, the avionics, and taking into account the ICAO EUR NSAP Address Registry [3] describing the structure and content of ATN NSAP addresses, avionic configuration is expected to embrace the following points, although individual avionics may not offer all options:

- **Aircraft's ICAO 24 bit technical address.**
- **Aircraft's Registration.**
- **The VER field of the ATN NSAP address.** In the absence of more specific instructions from the preferred ACSP, for General Aviation, this should be set to "C1" (hex), and for IATA registered airline operators, to "41" (hex), in accordance with [3].
- **The ADM field of the ATN NSAP address.** In the absence of more specific instructions from the preferred ACSP, for General Aviation, this should be set in accordance with [3] to reflect the State of registration of the aircraft. Typically the first octet should be set to ICAO Region Identifier, followed by the two character alphanumeric ISO 3166 (ALPHA-2) Country Code, represented as upper case characters. Airline operators using VER field "41" (hex), should set the ADM field to their three character identifier (typically the ICAO airline designator, as recommended by [4]) which should also be registered with IATA. If avionics require configuration of other fields of the NSAP address, these should also be set in accordance with the default values specified by [3].
- **The preferred provider.** Determination of the preferred ACSP is discussed in section 4.3. Certain avionics may nominate the preferred provider randomly at start-up for a Non-AOC flight.
- **Enable multiple providers.** AOC operators may elect to restrict connection only to the preferred ACSP to preserve AOC connectivity at all times, but it is more appropriate for Non-AOC operators to allow connectivity with other providers if the preferred provider is not available. Some avionics may require selection of specific 'Less Preferred' providers to enable this.
- **Establish initial VHF contact in VDL Mode 2 on the CSC (136.975 MHz).** AOC operators may elect to establish contact initially on the ACARS frequency of their preferred ACSP, and switch to VDL only if service is available. This is not appropriate for Non-AOC operators.

Additional configuration options relating to application level options may be offered by individual vendors.

The current version of this guidance covers only generic aspects as identified above. If specific information will be provided by vendors, operators or ACSPs, for avionics of interest for Non-AOC aircraft, it will be added in future versions.

4. NON-TECHNICAL ISSUES

Based on past discussions and information provided by the involved stakeholders, a number of non-technical issues have been identified which may impact the use of the ATC datalink by Non-AOC aircraft. Therefore this section discusses issues for which solutions are desirable to streamline the connection of Non-AOC aircraft to the ATN/VDL network, and interact with DLS.

4.1 CONTRACTUAL UNDERTAKINGS POTENTIALLY REQUIRED BY ACSPs

The principles guiding ATN design (section 2.1) highlighted that ACSPs may require certain contractual undertakings from Non-AOC operators in order to provide connectivity to support DLS. It is anticipated that such undertakings will embrace the following:

- Provision of information required by the ACSP, including details of the operator's airframes and avionics, as specified in section 3.1.
- Qualification of avionics to operate on ACSP networks. ACSPs place great emphasis on validating interoperability of avionics with their air-ground networks to protect the integrity and performance of the network for the benefit of all users. Generally, such qualification tests will be performed on avionics prior to certification, but where specific installation and/or configuration issues are perceived to impact interoperability, additional testing may be necessary. Operators will be required to confirm the AQP/VAQ qualification status of their avionics, as advised by the avionic vendor or integrator.
- Procedures to address any unexpected negative impact of an operator's avionics on the air-ground network.
- Legal liability for carriage of ATN messages.

ACSPs emphasize the desirability of centralized management of such agreements with Non-AOC Operators, so as to minimise the overhead on all stakeholders, as discussed further in section 4.2 below.

Note 1: At the time of writing, any such required contractual undertakings remain to be specified fully.

Note 2: ENAV have advised that they do not foresee any contractual undertakings being required from Non-AOC Operators to connect to their network.

4.2 PROVISION OF REQUIRED INFORMATION TO ACSPs

Section 3.1 highlights that Non-AOC operators will be expected to provide information to one or more ACSPs on their aircraft and the corresponding datalink avionics. Accordingly it is desirable to streamline the provision of this information, and avoid duplication of contact with multiple ACSPs, in order to ease the burden on Non-AOC operators and ACSPs alike.

One approach might be to establish a web based registration service by which individual operators register their aircraft and provide information on the corresponding avionic configurations, as well as confirming their agreement to any undertakings required by ACSPs. This might be combined with

an algorithmic allocation of the default preferred ACSP (as discussed in section 4.3) for the operator or aircraft. Information gathered by such a process could be shared automatically with all relevant ACSPs.

A further consideration is the provision of support to Non-AOC operators who may experience difficulties in achieving or maintaining ATN/VDL connectivity. Many operators will have little prior experience of datalink technology, and will not be able to access the level of expertise that many airlines enjoy. A potential role exists for a first-line support service that can offer advice in short timescales, and refer more complex queries to ACSPs and/or avionics vendors where warranted.

All the above issues merit further discussion with relevant stakeholders.

4.3 DETERMINATION OF DEFAULT SERVICE PROVIDER

It has been considered desirable for a Non-AOC aircraft to operate on the basis of a default or preferred ACSP to which it will normally attempt to connect whenever possible. Avionics generally are designed to operate in this way, since this is universally required in the AOC world.

Allocation of Non-AOC aircraft to a default provider allows for management of the distribution of the load on the network, with the aim of avoiding a disproportionate number of such aircraft being connected to a single provider, potentially leading to local network congestion.

Furthermore, the preferred provider of an aircraft/operator is taken into account in multi-frequency management, as well as in ATN routing at certain ANSPs (with direct connections to dual providers). Hence, absence of such an allocation in Non-AOC aircraft may compromise existing functionality.

This raises the question of how determination of the preferred provider might be performed for Non-AOC operators.

Certain Non-AOC operators may select a particular preferred provider for their own reasons, by mutual agreement with the ACSP, and there is no reason to interfere with any such arrangements.

However, it would be burdensome to expect all Non-AOC operators to select their own preferred provider, and hence an alternative mechanism is desirable to allocate a preferred ACSP to operators in the absence of any other considerations. Important characteristics of any such mechanism would be simplicity and ease of implementation.

One approach to do this might be to allocate the default provider on the basis of the country of registration of the aircraft. This would be straightforward to implement, and would offer the additional benefit of being consistent with current technical routing arrangements used by ANSPs with direct connections to two ACSPs. The EUROCONTROL DST team is currently seeking data on Non-AOC operation in the DLS implementation area, with the aim of exploring the feasibility of such an approach, to inform discussion with relevant stakeholders.

Such an approach would most likely not be suitable for operators of a large fleet of aircraft (e.g. commercial airlines), since it could distort the distribution of load between ACSPs, and in such cases mutual agreement with an ACSP may be more appropriate.

Other approaches may also be feasible and feedback and proposals are invited for consideration and analysis in a future version of this document.

4.4 AIRCREW TRAINING

It is not the aim of this document to give guidance on operational use of DLS and CPDLC to aircrew. Operational procedures are specified in EUROCAE ED-110B [5] and aircrew will be expected to be familiar with the concepts and procedures of ATC related DLS that are specified in that document.

In Europe, OPS rules give general provision on crew training on crew training, and Commission Regulation 965/2012 requires operators to ensure that their aircraft are equipped and crews are qualified for the type and area of operation, although these do not address CPDLC specifically. AMC1 FCL.725(a) specifically mentions knowledge of data-link communication in the syllabus for grant of a class or type rating. Class and type ratings courses are approved by National Competent Authorities or EASA, so may differ between European states.

FAA applies less stringent guidelines on training of General Aviation aircrew (AC 90-117 Part 91) compared to Air Transport, but this is not necessarily the case in Europe.

Commercial training courses on datalink operational procedures are available for General Aviation aircrew. However, training alone may not necessarily be sufficient. Proficiency is key, and GA aircrew are likely to fly more diverse routes so may be less familiar with practices in particular airspace. CPDLC simulators may be of value to supplement training courses.

Additional insight may be available from the DST's Operational Focus Group.

5. FURTHER STEPS

The issues identified in this document in relation to the access to the ATC datalink of Non-AOC aircraft are potentially important, not straightforward to address, and involve many stakeholders with different business objectives and interests. However a common objective should be the efficient use of DLS by all required stakeholders, whether they make use also of AOC or not.

In order to progress the resolution of the issues, it is important to engage and involve all relevant stakeholders and consider appropriately their needs. A dedicated working group has been established to discuss the issues and the way ahead and also identify committed stakeholders to help evaluate the potential solutions.

The output of such activities as described below will be important in preparing an updated version of this document with analysis and recommendations for the way ahead.

5.1 NON-AOC AIRCRAFT TASK FORCE

A Non-AOC Task Force has been established to address outstanding issues raised in this document, particularly those of a non-technical nature, considered in section 4. Ongoing participation of representatives of Non-AOC operators as well as the ACSPs will be vital, with additional input (*e.g.* from avionic vendors and ANSPs) being sought as necessary.

5.2 FAST TRACK NON-AOC OPERATOR INITIATIVE

In parallel with the work of the Task Force outlined above, it is also proposed that a small group of Non-AOC Operators be recruited, with the aim of troubleshooting the process of initial connection to ATN/VDL networks and becoming operational with DLS, as well as achieving more efficient connection using multi-frequency operation for those already connected. This is referred to as the 'Fast Track' initiative. Participating operators would be supported actively by guidance and intervention from appropriate technical and operational specialists to overcome any difficulties encountered, and lessons learnt would inform development of technical and administrative procedures for the benefit of larger numbers of Non-AOC operators seeking connectivity in the future.

EUROCONTROL will play a central coordinating role, forging links with technical contacts at participating operators, ACSPs, and avionics vendors, with the aim of facilitating flow of information, seeking technical solutions when necessary, and capturing lessons learnt.

Further information on this initiative can be found at <link to wiki to be added here>.

6. REFERENCES

- [1] Commission Regulation (EC) No. 29/2009, of 16 January 2009, laying down requirements on data link services for the single European sky (OJ L 13/3 17.1.2009), as amended by Regulation 2015/310 of 26 February 2015 (OJ 56, 27.2.2015).
- [2] Link 2000+ Network Planning Document. Edition 3.007 18th Nov 2013. Ref CFC/Datalink/NPD
- [3] ICAO EUR NSAP Address Registry. EUR Doc 028 Version 10.0 30th Apr 2020.
- [4] LINK2000+ ATN Naming and Addressing Plan. Edition 1.3 20th Aug 2012.
- [5] Interoperability Requirements Standard for Aeronautical Telecommunication Network Baseline 1 (ATN B1 Interop Standard). EUROCAE ED-110B Dec 2007, as modified by Change 1, March 2014.