

**NATS comments in response to CHIRP Report GA1319**  
**NOTAM and AIS information accessibility and promulgation.**

**GA1319 Report précis:** In summary, this report came to CHIRP in May 2022 and related to an airspace change involving the introduction of Class C airspace and changes to the vertical extent for the Daventry CTA and Clacton CTA. The reporter was from a flying school, and they had not been aware of the consultation for, or implementation of, the airspace changes (November 2021 and February 2022 respectively) due to the fact that they had not been flying over the period because of COVID/weather restrictions. By the time they had returned to flying in mid-March 2022, the associated NOTAM had been replaced by an AIC (AIC Y 006/2022) and the VFR chart had yet to be updated (the new Edition 48 Southern England and Wales 1/2mil map became available on 27<sup>th</sup> March).

The long and the short of it was that they got airborne unaware of the change, and it was only by good fortune that they did not infringe the new airspace. Setting aside the issue of personal and organisational responsibilities to check AICs etc when they returned to flying, with regard to airspace changes, the reporter opined that the introduction of the 'Luton Airspace' change wasn't very well communicated, and they suggest that any such changes should remain as active NOTAMs until after the publication of the associated revised VFR chart. More specifically, the reporter commented that, in their opinion:

*It is second nature to start the day looking through the Met Office website and reading through the NOTAMS on the AIS website. The UK AIP is far too large a document to be comprehensively read before each flight; that's why we have NOTAMS, or should have. When training in our local area, that's most of our flights, we look at NOTAMS by selecting the Point PIB, typically with a radius of 25nm from our home base.*

*I have not been a part of consultation on the new airspace and I would say that I look to my representative organisations, the British Microlight Aircraft Association (BMAA), the Aircraft Owners and Pilots Association (AOPA), the Light Aircraft Association (LAA) to comment on behalf of their members. Flying schools have little in the way of resources to comment on the numerous and lengthy consultation documents produced.*

*Whilst on the topic of NATS promulgation of airspace information, NATS Briefing Sheets exist to cover events where they will occur at notice too short to be included in the AIRAC cycle. But the existence of Briefing Sheets is unknown to many GA pilots. Should a pilot be searching for Briefing Sheets on the NATS website they are not to be found under the expected heading of Briefings or the next logical heading of NOTAMS but under Publications.*

Overall, the reporter said that the issue was one of communications and that their recommendations were:

- 1. To publish a document, for example, a yellow AIC on a website and not tell us about it when we need to know, that's on the day we do our flight planning, is not useful. The imposition of a new block of controlled airspace should be notified as a NOTAM from the date of inception until it has appeared in the new editions of the relevant maps for such time as is required for the GA community to know of its existence. If NATS are concerned about a proliferation of NOTAMs, I recommend they discontinue publishing those referring to Ethiopia, Ukraine etc; they appear for months on end and are of no relevance to a circle of 25nm radius around an airfield.*
- 2. The existence of Briefing Sheets and how to access them should be publicised throughout the GA community.*
- 3. The CAA should review their oversight of NATS communication of NOTAM information to GA.*
- 4. The CAA should consider engaging an advertising agency to define the methods and media and style to be used in communication; they are experts in putting a complicated concept into simple form appropriate to the target audiences.*

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## **CHIRP Questions to NATS**

Q1. Report GA1319 comments that Briefing Sheets and AICs are not easily found on the NATS website unless you know where to look. NATS already have buttons on their homepage for Publications, Charts, NOTAM and Briefing but we think there a case for similar 'AIC' and 'Briefing Sheets' that are currently only accessible in the 'Publications' tab or by selecting the 'Publications' button. Without suggesting that there's a plethora of 'buttons', perhaps there's a case for a single big red 'Airspace information' button that then corrals them all in a single area?

**NATS Response:** Our briefing system is designed to comply with ICAO requirements and the human machine interface ensures that relevant information is accessible in just two clicks. We group those things that contain effective data/information (AIP, AIP Supps, AICs, Briefing Sheets and Datasets) together as they need to have the same level of access priority.

Q2. Once you find the NOTAM, AIC etc sites, the information is largely presented in textual form as a series of documents. Pilots are visual people (a picture paints a thousand words) and we think that there should be a graphical interface that shows a chart with all airspace changes and NOTAMs etc highlighted. It would probably need to have selectable buttons to display which airspace information you wanted so as to avoid displaying everything at once and cluttering the display, but this could immediately show what airspace changes and NOTAMs were affecting your desired location/area. The chart would need to be zoomable and pan-able of course. There are already people who provide this facility by scraping the NATS data so why can't NATS do it themselves and cut out the middle-man (who make no guarantees that their data is accurate and therefore introduce risk into the system).

A graphical interface would take much of the misery out of the NOTAM/AIC/Briefing Note/Royal Flight process and could even provide a function to download/print the chart so that the risk of mistakes in flight could be further mitigated. NATS have a 'UAS Restrictions Map' so it shouldn't be beyond us to have a 'NOTAM', 'AIC' etc map? What would also help would be if the links in briefing material were also presented as QR codes on the page for the benefit of those who might be reading the material in hard copy rather than electronically.

**NATS Response:** This is also about ensuring we provide a service which complies with ICAO requirements, specifically: *"Automated pre-flight information systems shall be used to make aeronautical data and aeronautical information available to operations personnel including flight crew members for self-briefing, flight planning and flight information service purposes. The aeronautical data and aeronautical information made available shall comply with the provisions of Annex 15"*. We understand that the product formats specified by ICAO may not be operationally suitable for all users however it's all presented in a harmonised way and at a common access point. This has the advantage of enabling downstream commercial 3<sup>rd</sup>-parties to use the information to create specific products for which there are many varying use cases which are outside the scope of a State service provider. The UAS map you refer to is a CAA requirement and NOTAM are already displayed on a map as well as in text form.

Q3. A key issue was that although the airspace change was in the Luton vicinity it was not specifically titled 'Luton Airspace' but was titled in reference to the Daventry and Clacton CTAs. Those not familiar with the extent of airspace blocks might not associate such airspace changes with their local area and so would it not be preferable to include in their title some geographic information as to their relevance such as 'East Anglia' or 'Lincolnshire' for example?

**NATS Response:** With regards to the geographic naming of CTAs they are generally named after an airspace feature but are quite wide ranging in their scope. Worthing CTA, for example, goes to Dover and the Portsmouth CTA extends west of Bournemouth. Previous to the CTAs these bits of airspace were defined as airways which were likely less intuitive.

Q4. Why is the AIS website password protected? All of the information is safety-critical so why do we force people to create an account to access it? Having to register for an account and remember passwords etc is a hurdle to day-to-day safety activities, especially if you're using a computer that is not yours and won't know your password.

**NATS Response:** It is only the NOTAM request area of the AIS website that is password protected and the reason for asking people to create an account is to provide them with additional personalised functionality. The briefing handbook allows a logged in user to review all of their historic briefs; they can re-use the brief which populates a new brief with all the parameters (templating), create an update on an active brief which will return new/amended NOTAM for the active brief or simply review a historic brief. With an account a user can set personal routes, aerodrome lists and FIRs. All of this reduces the manual input of information which has a positive effect on safety day-to-day. Without an account, none of this functionality can be accessed – and the system only requires a one-off password and doesn't have onerous password rotation.

Q5. How can we improve the visibility to all aviators that airspace consultations and changes are in train? The reporter said that he relied on his professional association (BMAA) to look after his interests regarding consultations etc because he didn't have time to look at them all. It seems that people often find out about consultations 'by word of mouth'. The CAA SkyWise system is a step in the right direction but relies on people being subscribed and, as someone who is subscribed, the plethora of alerts can sometimes inure you to them. No doubt there are clever media agencies who could come up with a NATS Airspace Change Alerting App or similar whereby notification of consultations and changes (with graphical charts with any luck) could be pushed to people who subscribe. It would still require people to subscribe, but the more focused nature of such an application (and perhaps allowing people to enter an area of interest where only changes impacting that area would be notified) would mean fewer 'nuisance' notifications and might therefore get more attention.

**NATS Response:** The Airspace Change Process is owned by the CAA and involves many sponsoring agencies other than NATS. Changes to the Airspace Information products themselves are clearly identified in the AIP coversheet which is published every AIRAC and with 28 days' notice. Each page can be accessed directly in a browser following the links published on the charts themselves.

Q6. We all know how sub-optimal the current NOTAM system is, but people get increasingly frustrated when they enter Point PIBs and still get global NOTAMs (about Ukraine etc). We appreciate that the NOTAM system is international and out of NATS' control but it surely must be possible for the NATS site to filter out these global NOTAMs because the system is at risk of being discredited and losing the goodwill of the local GA user.

**NATS Response:** NOTAMs like the ones for Ukraine are sponsored by the CAA via DfT and they require them to be seen by all users. The existing NOTAM briefing system will return everything within the parameters specified for the NOTAM type requested. If the NOTAM type returns "Enroute NOTAM" then any global NOTAMs (within a 999NM radius) will be generated. The briefing system already has the functionality to exclude any NOTAM from the printed PIB. Once the NOTAM has been unselected for print, it won't be reproduced on the .pdf PIB. This option can be retained for all future returns meaning that whilst NOTAM still appears in the initial response it won't appear on the .pdf PIB.