5th November 2008

Tzvetomir Blajev
Coordinator Safety Improvement Initiatives
EUROCONTROL

Dear Mr. Blajev,

At a recent meeting of the IFALPA ATS Committee the members addressed a request from LVNL ATC Netherlands to comment on SID Deviations at Amsterdam Schipol airport.

The following comments were received from the Committee members and are listed below, additional responses are also attached.

- The Flight plan is not inputted until the clearance is received.
- Not all companies use readymade flight plans.
- The Committee disagree that the pre input of this information is the problem
- Often a change of runway is received whilst taxiing – there is too high a work load at this point and too much frequency congestion, it is possible to forget the change.
- A cross check of the SID is recommended prior to take off
- There are time constraints when a late clearance is received.

IFALPA greatly appreciates the opportunity to contribute to this discussion and values the good relationship forged between our two organizations.

Yours sincerely

Sacha Whitehead
IFALPA Technical Officer
ATS Committee

COMMENTS FROM THE IFALPA ATS COMMITTEE REGARDING THE RSM SID DEVIATIONS:

1) SIDs & STARs are named with a five letter name & alphanumerics but an aircraft FMC can only accept a 4 character code & alphanumerics. So each SID is named in the navigation database differently than used in an ATC Plan or on an OFP. I don't think ATC are aware of this FMS limitation.

2) SID's need to be designed better. I appreciate that are designed in accordance to the rules but it is high time that common points are used for transition onto the airway network that cover all runways not just one.

3) It is high time that common points are used for transition onto the airway network that cover all runways not just one.

4) Some insist on a standard SID being input into an OFP (ATC Plan) even if it cannot be planned independent of the runway in use. It must even be specified on an RPL! All because national ATC data processing systems cannot cope. If the runway in use is in doubt or cannot be predicted than the ATC Plan /RPL should not specify a particular SID.

5) I find it unfortunate that they use the same letter "S" for both right and left turn SID's. Stockholm/Arlanda had a similar problem, but they changed the coding of SID's, using different letters for right and left turn SID's. After the change, the number of misunderstandings and incidents have been reduced dramatically.

6) AMS AIS thinks the problem comes from pilots entering the departure from their flight plan and then failing to correct it when given another departure clearance.

7) A "Check SID" statement on a Company prepared flight plan strikes me as a method f absolving everyone else and sheeting the blame home to the flight crew.

8) I honestly believe this is rather an SOP adherence issue rather than a ready made flight plan problem. We normally get the clearance then check what we have been cleared to against paper flight plan and then against FMS. If no corrections have to be made to FMS we continue on with cockpit preparation as "inserted".

9) These issues have plagued us for some time. In many cases, pilots that receive PDC clearances have overlooked "amendments" and have departed on the wrong procedure. In other cases, companies will use "company routes" in the database. The company routes do not reflect the actual clearance received and pilots depart on their merry way.

10) Many airports that we operate from in Europe have multiple SID's for single departure runways with very similar names, some only differentiated by a single letter. This sets pilots up for a relatively high chance of selecting an incorrect departure.

11) A practice which is very effective at some large U.S. Airports is for the flight crew to announce the departure SID when calling for initial taxi clearance. This allows both the flight crew and the ground controller to verify that the crew is planning to fly what ATC is expecting and provide ample opportunity to discover and correct any indiscrepancies prior to flight.

12) In the near future we will be implementing Climb Via phraseology, which is very similar to Descend Via phraseology that has been in use for years in the US. Pilots will be required to state the name of the procedure they are departing on with their initial call to ATC - "Transtar 48, leaving three thousand, climbing via the HOBEE One departure."Realizing Climb Via is not a part of ICAO at this time, perhaps we could encourage the use of stating the SID with the initial call to ATC on departure.

13) If we do it on initial Taxi call the departure could still be changed during taxi or a departure delay, resulting in an untapped error. If it's on the initial call to departure (assuming that departure has the capacity available on frequency to handle the extra verbage), that would appear to trap all errors and be able to contain deviations fairly quickly (assuming a fairly timely call to departure).

14) The answer to this problem is having robust SOPs and sticking to them. I am happy that our SOPs cover the problem and see no need to change things significantly - certainly, the SID on the flightplan is a useful start to help programme the FMS, which is then checked against the received clearance and amended accordingly.

15) A SID is the only clearance that we expect to receive cause is on the FPL and we are induced to be confused. I believe it could be a good practice to readback the SID, reading directly the ROUTE (RTE) page on the FMS. That page could be kept open during taxiing on CM2 side or ,on PNF side, and be changed with the climb page or T.O ref page as soon as the SID has been read back to the controller