



*European Federation of Airline Dispatchers Associations*

---

---

Member of IFALDA

Mr. Roberto Salvarani  
DG Energy and Transport  
Rue de Mot 24 5/23

B-1049 Brussels/Belgium

Mr. Gernot Kessler  
European Commission  
Directorate General for Energy and Transport  
Head of Unit F3 - Environment and Air Safety

Dear Sirs,

It is my pleasure to comment on the idea of continuing a German way in the flight dispatch/operational control issue.

In March 2008, the Federal Ministry of Transport, Building and Urban Affairs hosted a discussion with Aircraft Operators in Germany (DLH, German Airforce, Air Berlin, DCA, Hapag Lloyd, Condor, Lufthansa Cargo, Lufthansa City Line and others). Together with the German Airline Dispatcher Association (Member of EUFALDA), the Airline representatives gave a clear picture of the future qualification and license requirements of Airline Dispatchers in Germany. In view of the missing qualification and license standards in Europe, the industry representatives asked Mr. Thomas Mickler, as the representative of the German Transport Ministry, to adjust the given German regulations to a more practicable and ICAO-based qualification and license standard.

It is the objective to change the given German regulations to be fully in line with the ICAO-standards, together with the given strict examination and license requirements of the German Aviation Authority.

To avoid possible conflicts with regulatory issues of the European Commission, I would like to ask for a comment from your side.

To provide a view to the situation of Airline Dispatch and Operations Control, I would like to explain the basic aspects of the situation in Europe and in view of the EASA/FAA-harmonisation, also of the conditions in the states.

Operational control/dispatch systems generally encompass two basic functions: A pre-flight planning and crew briefing function as well as a monitoring function to provide safety information and support to the crew while they are in-flight.

The operational control/dispatch systems in use at present in Europe generally fall into the following categories.

0. Not really a system. It basically simply generates flight plans. No in-flight monitoring of flights at all. No training for ground personnel required. Any operational functions may be spread over several non-certified functions. (EU-OPS system). (Many European states use this- i.e. UK, France, Spain, etc).
1. Centralizes dispatch functions in one person/or aircraft dispatcher/flight operations officer and assigns responsibilities to that individual. Requires ground personnel/dispatcher training but not state certification. Also has some in-flight monitoring, but not being followed in many countries. (ICAO-Annex 6).
2. Requires qualifications/training and tools/communications systems but not certification of ground personnel/aircraft dispatchers, and does have some in-flight monitoring. (IATA-IOSA System). All code share IATA member carriers are now going to this system if they do not have a higher level system. Industry agreement, not regulatory.
3. Requires state certification of ground personnel/aircraft dispatchers but has no requirement of in-flight monitoring. (Some European States i.e. Germany, Austria, Scandinavia, Iceland ).
4. Requires state certification of aircraft dispatchers and has in-flight monitoring. Does not have joint responsibility of the pilot and dispatcher. Usually has a training requirement. (Some other states-Asia, etc).
5. Requires state certification of aircraft dispatchers, comprehensive training and communications/support tools, has in-flight monitoring and joint responsibility between the dispatcher and the pilot. (US-FAA Part 121 style system- has also been adopted by a number of other states, i.e. Canada, People's Republic of China, Malaysia, United Arab Emirates).

All these systems are flying in European airspace. There are states issuing flight dispatch licences or recognizing other state licences (even from overseas) or doing nothing like this. Not really a regulated and controlled area in this sensitive environment of European Aviation.

Several accidents in Europe over the last years show the need of well trained ground personnel, especially for Flight Dispatchers / Operations controllers who support the crew in-flight and doing pre-flight planning functions.

We think it is essential to have Germany continuing their training program and also issuing state licences for their flight dispatchers and operations controllers.

Sincerely

Matthias Dürbeck  
President EUFALDA

04<sup>th</sup> of February 2009

1 copy to Mr. Thomas Mickler, Bundesministerium für Verkehr, Bau und Stadtentwicklung