



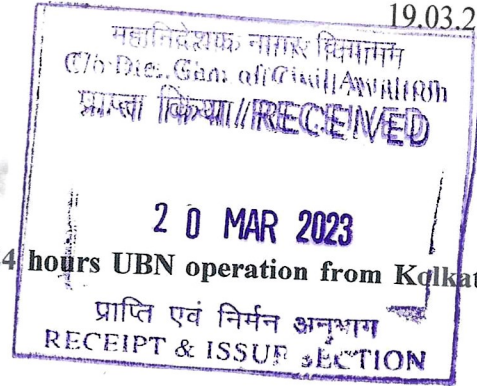
वायु यातायात नियंत्रक गिल्ड (भारत)
AIR TRAFFIC CONTROLLERS' GUILD (INDIA)

CC/ATCG/Ops/2023/02

The Chairman
Airports Authority of India
CHQ, Rajiv Gandhi Bhawan
New Delhi - 110003



19.03.2023



Sub: Preparedness for the implementation of 24 hours UBN operation from Kolkata - Reg

Sir,

ATC Guild (I) is thankful for the various initiatives and decisions taken by your good office for reducing the shortage of ATCOs, and we are sure that with upcoming 456 post creation and further creations of post in ATM Dte in upcoming years will definitely end up the shortage of ATC manpower in AAI. Under your able leadership we can achieve any organizational goal once the optimum trained manpower is available at the stations, but unfortunately the local management at Kolkata is unable to understand the importance of trained manpower and forcing working controllers to take a major safety risk for aircraft and its occupants.

ATC Guild (I), being a professional body would like to draw your kind attention towards this safety critical subject matter. This issue has already been taken up with Member (ANS) office vide letter no. CC/ATCG/Ops/2023/01 dt.30.01.2023 (Copy enclosed) wherein we have already apprised office about the safety critical shortage of radar controllers at Kolkata, limitations of VHF coverage, non-publication of Sector Capacity, AAIB recommendation for UBS sector etc. Apart from the various concerns raised by us in our previous letter, we would like to submit the following facts to your good office for a safe implementation of Kolkata UAH.

1. Presently, Kolkata is having around 300 licensed controllers among which 79 officers are Radar controllers (24 Terminal Radar Controllers and 55 Enroute Radar Controllers). Each shift is having 14 radar controllers (including WSO) and 9 radar controllers are deputed in general duty.

There are 7 sectors in day time and 6 sectors during night duties in Kolkata Area Control. After implementation of 24 hours UBN implementation Kolkata will be having 7 Surveillance sectors in the day and 5 surveillance sectors in night duties (two sectors are combined with other two sectors).

To run morning/afternoon shift duties, at least 3 ASR controllers and 11 RSR controllers in each shift excluding WSO are required. As all the WSOs are radar rated controllers, minimum radar rated controllers required in every shift is 15. If we consider 10% manpower (minimum) for leave reserve and temporary unfitness, the requirement for Radar rated controllers in each shift becomes 17 (15+2). So, Kolkata needs at least 15((17-14)*5) more surveillance radar rated controllers to run the UBN operation 24 hours.

The above calculation holds good until we have WDTL exemption, once the WDTL CAR is implemented the figure mentioned above will definitely go up especially in the night duties where we need to relieve the controller after two hours as per DGCA CAR section-9 series- L Part VII (11 January, 2023) point 7.2 .1 (a) as the sector capacity of the sectors are not declared.

[Signature]

2. Starting UBN operation on the verge of transfer season may be catastrophic if the controllers who are due for transfers got relieved after transfer and incoming controllers to be rated for surveillance units which normally takes almost 2 years after joining. Till such time managing all sectors of Kolkata UAH along with 24 hours UBN may result in compromise with safety.
3. During UBN trial operations we have faced instances when Lucknow radar was out of service or VHF was down for a reasonable time at some occasions. Even Varanasi radar was not available for almost two days in the recent past. **Provisions shall be made to handover UBN sector to LBN sector in case of contingencies like Chennai UAH.**
4. Kolkata has been operating UGT sectors since March 2021 in the hope that manpower rationalization will take place between Upper and Lower Area Control sectors but till date it has not been materialized. **Till Kolkata has the desired number of Enroute surveillance controllers, efforts shall be made to operate UGT sector from Guwahati itself so that these controllers can be deputed in other sectors.**
5. UBN sector being operated in a single sector where the peak traffic movement goes upto 45-47 per hour violates *ATMC 02 of 2018*. On a single frequency operating such a volume of traffic poses serious threat to the safety of an aircraft and its occupants where so many climb and descent are involved. **Like Varanasi area control sectors (2 bifurcated sectors) efforts shall be made to bifurcate the UBN sector before the 24 hour operation starts from Kolkata to ensure safe and efficient control of Air Traffic in UBN.**
6. **OPE duty allowance may please be approved by CHQ to all levels including Jt. GM/ DGM who all have to perform mandatory duties of UBN operation and in near future for shifting into the New ATS building which will be commissioned soon. OPE allowance may be a motivating factor to walk an extra mile for working controllers.**

Before 24 hours UBN operations implementation, a proper safety assessment may please be carried out. In this matter ATC Guild (I), would like to bring your attention to the following:

- a) A safety assessment was carried out on 16.03.2023. Again within 24 hours another safety assessment (re-assessment) was carried out on 17.03.2023. The reason for re-conducting the safety assessment is best known to local management at Kolkata, but, if everything was found within proper safety limit then why re-assessment was done the very next day. In Corporate Safety Management System manual by AAI nothing is mentioned as re-assessment with this timeframe by the same committee members. In view of safety of aircraft and its occupants, an investigation may please be done to arrest any manipulations done to reduce the safety risk from Major to Moderate.
- b) According to the "Guidelines for completing scars form" mentioned in C-SMS manual the provision of online meeting is nowhere written although both the safety assessments were conducted in online mode (please refer *Aviation Safety Advisory Circular No. 01/2014 "Guidelines for completing scars form" para 5.4 Arrangements: "Safety assessment meetings should be conducted in a room with basic conference facilities).*
- c) Whether any Risk assessment was done because of the changes in staffing arrangements (please refer *C-SMS manual Chapter- 7 para 7.4.5.2 ATS bullet point number 6).*



d) No frontline/working controller, not even instructors having UBN authorization who is an important stakeholder (except training in-charge) were invited in the safety assessment except executives in the capacity of WSOs and HODs. Among these, some of the HODs and the most importantly 3 out of 5 WSOs do not have UBN authorization. None of the ATCOs except WSOs and the HODs received any information with respect to the safety assessment by any means, not even official mail.

e) No representative of ATC Guild (I), ER was invited to attend the meeting, although ICAO DOC 9859 (Safety Management Manual) Chapter 5 Para 5.2 point c) depicts industry trade associations as stakeholders of safety assessments.

f) Reference may please be made to the Aviation Safety Advisory Circular No. 01/2014 "Guidelines for completing scars form" para 5.3.1, "The intimation should reach the stakeholders at least 15 days before the date of the meeting". At Kolkata; the intimation of the meeting was given just a few hours before the start of the meeting. ATC Guild (I), fails to understand the reason for the rush to execute the safety assessment that too without any circular.

Sir, in view of the above, ATC Guild (I), considers the safety assessment improper and requests for a safety assessment as per C-SMS manual.

We also request your good office to bring this to the notice of the DGCA so that if any untoward incident occurs due to poor preparedness for 24 hours UBN Operation, manipulations done in Safety Assessment by local management, then no penalty shall be imposed on the working controllers but the concerned officials at Kolkata who are forcing this situation on the controllers of Kolkata may be held accountable.

ATCOs are always committed to achieve all the organizational goals and we have always accepted the new challenges. In UBN 24 hours operations implementation also, we want to complete this project with minimal acceptable levels of safety risk for aircrafts and its occupants. For doing so, we request the minimum required trained manpower, bifurcated sectors with acceptable no. of aircrafts in each sector, availability of radar feeds and VHF coverage.

ATC Guild (I) submits the following suggestions for kind consideration for safe and smooth implementation of UBN operations on 24x7 hours basis.

- 1) To deploy at least 17 en-route surveillance controllers (preferably those who have been transferred from Kolkata may be brought back who can acquire rating within 7days) apart from our existing strength.
- 2) Bifurcate the UBN sector before the implementation of 24 Hours UBN in-line with the UBN operation from Varanasi.
- 3) OPE duty allowance shall be approved by CHQ to all levels right from Jt.GM to Junior Executive with one day basic + DA + OPE Allowance + Pro Rata Basis Rating Allowance, Stress Allowance and Instructor Allowance as admissible as per the earlier practices for other stations like Delhi and Mumbai.
- 4) Responsibility shall be given to the WSO for consolidation of sectors and for that sector capacity of all the sector needs to be ascertained along with the policy for consolidation.



Truly speaking sir, if any incident happens, the whole system blames the concerned controller but the least is talked about these contributing factors and local management actions.

ATC Guild and our entire member ATCOs are always with you to achieve the best in Indian Aviation.

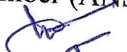
Regards



(Alok Yadav)

General Secretary

Copy to:

- Chm*
20/3/23
1. The Secretary, Ministry of Civil Aviation, AAI, CHQ, Rajiv Gandhi Bhawan, New Delhi – 110003.
 2. The Director General of Civil Aviation, Opposite Safdarjung Airport, Aurobindo Marg, New Delhi – 110003.
 3. The Member (ANS), AAI, CHQ, Rajiv Gandhi Bhawan, New Delhi – 110003.
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वायु यातायात नियंत्रक गिल्ड (भारत)
AIR TRAFFIC CONTROLLERS' GUILD (INDIA)

CC/ATCG/Ops/2023/01

30.01.2023

The Member(ANS)

Airports Authority of India

CHQ, Rajiv Gandhi Bhawan

New Delhi – 110003

Sub: Safety critical hazardous conditions arising due to UBN Operations at Kolkata.

Sir,

Your kind attention is drawn towards the difficulties and hazardous conditions faced by Air Traffic Controllers at Kolkata while discharging their duties due to implementation of 12- Hours UBN Operations at Kolkata in a safety critical shortage environment. In this regard, the following facts are submitted for your kind perusal:

1. Most of the sectors at Kolkata ACC are operating at traffic volume way above the optimum sector capacity (as per ATMC 2 OF 2018).
2. A report of AAIB recommended to bifurcate sector UBS because of traffic scenario and conflicts therein, which is yet to be implemented by higher management.
3. In annual transfers of 2022, the total number of Controllers at Kolkata reduced from 313 to 290, in which 16 rated en-route surveillance controllers had been transferred.
4. Presently, Kolkata airport has 290 ATCOs, with 50 rated en-route surveillance controllers, whereas as per approved DPR for Kolkata FIR Upper Airspace Harmonization, the required manpower is 330 (excluding URP and Arrival).
Here, it is crucial to mention the substantial increase in number of newly opened RCS airports in every sector and the new lower level routes implemented in association with these.
5. Since the implementation of UAH in 2015, all the Lower ACC sectors (e.g. LBS, LPT, LKW) are merged with one or the other Upper ACC sector.
6. Taking 07 ACC sectors and 09 En-route surveillance controllers into consideration, it does not allow any space for an emergency leave/ Temporary Unfitness/ Tour for a single RSR controller. In such scenarios, WSOs are left with no other option then to deny leaves. Even maintaining recency/currency of en-route surveillance controllers in procedural positions and the Oceanic sector are at stake.
7. The geographical boundary of Kolkata Area Control has increased beyond that of initial UAH as portions of Mumbai and Chennai airspace have been delegated to Kolkata for

- the provision of Area Control Services although those portions lie in Mumbai FIR or Chennai FIR.
8. As a trial for UBN operations from Kolkata ACC, training for En-route Controllers (both surveillance and procedural) commenced from October, 2021. During discussions it was committed that UBN operation will be done from Kolkata only if controllers' strength augments and reaches the number as depicted in the approved DPR for Kolkata FIR UAH.
 9. It is pertinent to mention the difference between rated/licensed (trained) manpower and untrained (newly joined) manpower, which our management is well aware of. It needs minimum 6-8 months for a fresh Radar-course completed controller to acquire ACC surveillance rating. In the name of manpower posting, Kolkata is being filled with JEs and AMS, who have ample time left till they go for their radar course. Thus this manpower is completely remaining un-utilized in current scenario of shortage. To bifurcate any sector or to operationalize a new sector definitely it needs a relook into the rated / licensed controllers along-with some other factors.
 10. Because of non-availability of Lower Area Control centers, controllers' traffic and VHF load increases to a great extent and controllers are left with no other option but to take control of flights even in very lower levels. Even after huge number of transfers in 2022 (16 en-route surveillance controllers along with others), there was an increase in UBN operations since March 2022.
 11. UBN is a single sector, having VHF (127.525 MHz) stations at Varanasi, Khajuraho, Jharsuguda and Raipur. It is necessary to have new VHF (127.525 MHz) stations at Lucknow and Gaya/Patna along-with relocation of Raipur transceiver (127.525 MHz) at Jabalpur.
 12. During UBN trial operations it was observed that the peak traffic had reached to the extent of more than 40 aircrafts (average) at a time, which includes multiple climbing and descending traffic in poor VHF coverage conditions. It is felt that bifurcation of sector is very much necessary for the safe conduct of flights during high volumes of traffic.
 13. It is note-worthy to mention that UBN operation from Varanasi has two sectors (128.15MHz and 118.95MHz) during high traffic volume scenarios, which are merged to one sector during lower traffic volume. The same practice can be implemented in Kolkata for UBN operations, but, again the question squares down to trained manpower availability in Kolkata to sustain these many sectors.

The management is vehemently forcing 12-hours UBN operations (from time 1330-0130 UTC) from Kolkata ACC from 31/01/2023, and subsequently 24-hours UBN operations from Kolkata ACC from 31/03/2023, with the present manpower only.

In the wake of 12-hours and latter 24-hours operation of UBN from Kolkata and the lack of proper trained manpower, the resulting extra duties and minimal rest/relief periods with high

level of stress due to high traffic volume, may not only damage health but also may result in immediate deterioration of one's ability to remain vigil and loss of situational awareness on part of the controller, this will fail the objective of the circular dated 26/12/2022 regarding advisory for "Brain Fog" while discharging ATC duties.

After working on busy sectors (where traffic volume sometimes reaches more than 40 aircrafts at a time) for two hours, controllers mostly gets 30 minutes relief before taking over channel again, which seems insufficient to get the stress levels down as 10-15mins time is consumed in traffic briefing in busy traffic environment. The present situation in Kolkata may have some huge repercussions on the health and stress level of Controllers only because of the demand of the duty.

The forceful attitude of management towards operation of UBN from Kolkata without sufficient manpower, proper VHF coverage, and proper rest/relief breaks for Controllers may have serious repercussions on air safety.

In view of the above, the following suggestions are submitted for your kind consideration:

1. The **sector capacities shall be defined** as soon as possible pan India for all ATC Units/Sectors, so that it is known to the controller and the management that the traffic is beyond the limits of resources and accordingly bifurcation of sectors and manpower provisions shall be made.
2. Before operationalizing any new sector, **proper VHF coverage shall be ensured** by installing new transceivers/RCAG or new frequency as per the demand of the airspace structure.
3. In case of non availability of trained manpower, **the operationalizing of such sectors may please be postponed in the interest of aviation safety till the optimum manpower as per approved DPR is not available at the station.**
4. We are alerting management time and again regarding shortage of ATCOs almost since a decade, again, we request your good office to expedite the process of post creation and apart from 456 posts pending with DPE, **the requirement for operationalizing new sectors, upcoming airports may please be assessed as per latest ATM Staffing plan approved by AAI Board and instructions may please be issued to officials for further post creation in ATM Dte** as it takes minimum 3 years to train and make use services of an ATCO.
5. The DGCA has promulgated rest and relief requirements for ATCOs vide WDTL CAR, most of the ATS in-charges are reading and implementing the maximum limits defined for duty periods without assessing the impact of heavy traffic density or fatigue caused due to longer duty periods. It is requested, that wherever, the traffic density is heavy i.e. more than the estimated sector capacity (if sector capacity is not defined), the

controllers may please be provided ample relief (45mins to 1 hour, not only the minimum quoted 30mins in CAR as almost 10-15mins out of 30mins are consumed in traffic briefing in busy traffic scenario) to get de-stressed, and also it may please be ensured that ATS in-charges shall not force controllers to perform longer duty periods of 12 hours (maximum permissible in WDTL CAR) or so at a stretch as it leads to fatigue and poor health conditions of ATCOs safety hazards like "Brain Fog".

It is requested to your good office to arrest the safety critical situation arising at Kolkata due to forceful operationalization of UBN by postponing it. Also, it is requested to kindly ensure that in case of any incident/accident or lapse found while exercising the privilege of license then the controller shall not be held responsible singularly, but the whole management involved in creating this stressful atmosphere in Kolkata shall also be held accountable.

Assuring you best cooperation.

Regards



(Alok Yadav)

General Secretary

Copy to :

1. The Chairman, AAI, CHQ, Rajiv Gandhi Bhawan, New Delhi – 110003.
2. Executive Director (ATM), AAI, CHQ, Rajiv Gandhi Bhawan, New Delhi – 110003.
3. Executive Director (ATFM), AAI, CHQ, Rajiv Gandhi Bhawan, New Delhi – 110003.