



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 vigilant 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 get 30 minutes relief before taking over channel again, which seems insufficient to get the stress levels down as 10-15 mins 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.