# International Federation of Air Traffic Safety Electronics Associations

## Region Europe
## IFATSEA

*The Global Voice of Air Traffic Safety Electronics Personnel*

**Our ref:** Eur/06/22-12-2023

**To: Mr.** Christos Staikouras
Minister of Infrastructure & Transport
Greece

**CC:** as per table of distribution

**Subject: IFATSEA concerns regarding the Digital/Remote Towers Project in Greek Airports**

Dear Minister C. Staikouras

The International Federation of Air Traffic Safety Electronics Associations (IFATSEA) represents the global community of Air Traffic Safety Electronics Personnel (ATSEP) and their Associations (www.ifatsea.org). Our Greek affiliate (ΕΝΗΜΑΕΚ/ΥΠΑ) has informed us that the Greek Government plans to invest on Remote Tower (RT) technology in 12 controlled airports, with the aim of enhancing performance and increase capacity.

IFATSEA, as per its constitutional role in global aviation technology, does not oppose the implementation of new, proven technological solutions. For many years, we have been

closely following the progress of Remote Tower technology in SESAR and other global implementations **providing our input based on our Operational and technical experience**.

IFATSEA has been observing the interest in the deployment of Remote Towers in Greece and believes that under certain conditions, it could be useful, provided that they are **seamlessly integrated into Air Navigation Service Provider (ANSP) systems and operations in a stepped approach.** However, at this point, we understand that **this critical interoperability requirement has not been sufficiently addressed.**

As you know the successful implementation of projects, **of such safety critical nature**, regardless of their size, requires a comprehensive, de-risked and meticulous planning and design implementation and deployment process as they constitute a major Change in the ANS functional system.

ANSPs should consider the actual need for such solutions, base it on local operational requirements, technical specifications , in alignment with their business objectives, safety planning including a strong risk management. Besides that,  be  supported by an in depth feasibility study  and a fully justified Cost Benefit Analysis (CBA) and transition plan. However, we note that in the published Greek LSSIP until 2022, there was **no declared intention for HASP to implement any Remote Tower** installations and **the study done is at high level**.

Regarding the human element, it is imperative    to involve Air Traffic Electronic Professionals (ATSEP),from the outset of the project, to work closely with Air Traffic Controllers (ATCOs) and develop a sustainable project plan, while ensuring safety and avoiding any potential risks during all phases of the project. All these steps should be completed before seeking funding of any large-scale project.

It is crucial to note that **missing any step** of the above process **poses a significant risk** to the project's success **and potentially to air traffic safety,** notwithstanding the **impact on the economic side** with Tourism being a major driver to the Greek economy.

IFATSEA has identified several potential concerns associated with the intended implementation of Greece's remote tower project.
These include:

- o The absence of a comprehensive in depth **safety assessment**, which is crucial in ensuring safe and seamless operations that takes due account of human resources. This assessment should be based on the current European legislation on the ATM/ANS provision and the industry best  practices.
- o The absence of a **convincing Cybersecurity consideration and assessment** of  the digital RTs project which is of a networking distributed nature and scale.
- o The **magnitude and complexity of the project is challenging** as it involves transforming local towers into remote ones in 12 airports either sequentially or

simultaneously. We have not identified such extend and complexity of a RT project worldwide. This project would be the first of its extend globally, as states and ANSPs usually **implement a pilot project first.**

- o The **lack of a detailed interoperability assessment** of the remote tower infrastructure with existing and planned or under-procurement CNS/ATM systems of the HASP. Failure to ensure interoperability between these systems **constitutes a deployment risk** and can seriously impede and delay the operation/deployment of digital RTs in Greece.
- o the infrastructure at the airports of interest is old and **needs replacement** , in many cases and augmentation with modern facilities to enhance resilience, performance, and capacity must also be comprehensively planned. Please note that the i**ntended capacity improvement at airports is not only a function of the ATC tower but collectively** with Communication, Navigation and Surveillance facilities **operated, supported and maintained by our ATSEP colleagues in any airport.**
- o Addressing network **communication and connectivity difficulties, driving safety critical operations,** particularly due to Greece's unique geographical terrain and especially on the Greek islands.

Given the above identified risks and concerns, it is essential to approach the project with thoroughness and caution, especially to what is related to the human factors of the key roles in the ANS provider.

More specifically, it is stated by the European law that the technical support for all new systems should be provided by competent, trained and under the Greek Law licensed HASP ATSEP. However, the Greek Union ENHMAEK informed us, with regard to manpower planning , of your recent decision to **hire only 7 ATSEP** without taking into consideration that ATSEP numbers are projected to **be further reduced by about 25% in the next five years** due to retirement **neither taking into account the RTs project ATSEP requirements**.

IFATSEA strongly believes that the recent **manpower hiring decision for ATSEP must be seriously re-evaluated** considering this and other ongoing projects, by hiring substantially higher numbers of ATSEP to de-risk both physical and remote tower systems and services and ensure safety, availability and continuity of service. Failing to hire the necessary ATSEP will **constitute a risk and potentially a showstopper** for the success of the project.

It is also worth noting that although ATSEP experts of HASP are well experienced and fully capable of undertaking new tasks, as they are among the highest qualified professionals in Europe, they will require **further specialized training** on the new systems. This must be done **proactively in a commensurate way to the mentioned project plan complexity.**

Finally, on the social side, although it is not directly within our remit, **the mobility of people who will be required to leave the airport sites to serve in the centralized part of the RT facility, will be an important and crucial issue**, especially during ATSEP and ATCO training, as well as the shadow and systems test and acceptance operations.

IFATSEA welcomes any initiative that improves Air Navigation Services infrastructure, as long as it is done within the ICAO Total System approach. However, it is imperative to remember that **the human element of ATSEP, ATCO, and other personnel, is crucial to the success of this investment and ultimately serves safety, efficiency and the passenger**.

We express our sincere regard and concern of the above aspects of this project, and **we remain available to provide any further information you may require**.


Yours sincerely,
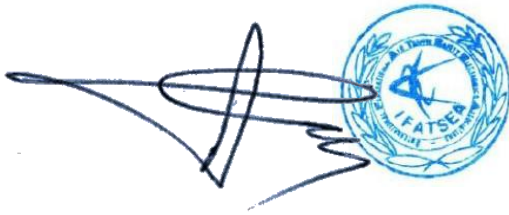



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