

## **Submission to the Senate Enquiry into the Performance of Airservices Australia**

I have recently retired from Airservices after thirty five years of employment as an air traffic controller including twenty years working in the Adelaide Terminal Control Unit (TCU).

There have been a number of decisions made by both Airservices and CASA management over recent years, that, as someone actively involved in the provision of Air Traffic Services in Australia, I have had difficulty comprehending.

The most recent example of this is in relation to the plan to remove TCUs from their parent tower location. From the knowledge and experience I have acquired over many years of working in a TCU environment, I am completely at a loss as to why Airservices management has such a desire to relocate Australian TCUs into the Melbourne and Brisbane Centres.

The relocation of Adelaide and Cairns TCUs has recently been approved by the Airservices Board and even though the logistics of relocating the Sydney TCU would be enormous, this is still on the agenda of the Airservices Executive.

The standout to me has been the ever changing array of reasons for TCU relocation. There has been efficiency, economics, controller employment progression opportunities, increasing traffic numbers, best practice and finally the fact that it is “strategic”.

I do not believe any of these arguments have been able to be backed up with any irrefutable evidence that a better or even equal Air Traffic Control service can be provided with the current Adelaide TCU relocated to Melbourne.

From my perspective, the disappointing thing is that it would seem very clear that the decision to relocate the TCUs was made years ago and ever since it has been a case to justify this decision.

There is no one on the Executive with TCU experience. This is certainly not unusual and thus the establishment of a working group to investigate the relocation of Sydney, Adelaide and Cairns TCUs would in theory be a valid way to progress. However the fact that again, on this working group, there were no TCU experienced members does make me wonder as to its validity.

Airservices will quite correctly state that controllers had the opportunity to input their questions on TCU relocation to a web page. However these were invariably responded to with motherhood statements that made it quite obvious that a decision had already been made. For a decision as important as this, any way of directly including the professional views of experienced TCU controllers from the affected locations and, having these views actively debated, would have been imperative in providing the most accurate outcome.

There have been a number of statements made by the Airservices Executive in relation to TCU relocation, that warrant questioning.

### **Comparison to previous Canberra and Gold Coast TCU relocations**

The constant comparison to the relocation of Canberra and Gold Coast TCUs to the currently proposed relocation of Adelaide TCU (and still possibly Sydney TCU), is far too simplistic.

Unlike Adelaide and Sydney, both Canberra and Gold Coast towers have always had control of a significant volume of airspace around the tower.

A fair percentage of aircraft that operate locally from these airports would never even enter TCU airspace. This reduces workload, complexity and the need for local knowledge significantly. The fact that Adelaide Tower is not normally responsible for any airspace volume and that the Adelaide TCU does control all airspace around Adelaide, is a major operational difference.

To give Adelaide Tower responsibility for airspace of similar proportions to Canberra and Gold Coast Towers would certainly go a long way to overcoming the need for local knowledge within the TCU. However, there are a number of reasons why Adelaide Tower does not have such airspace, namely the amount of added coordination that would be required with the closely located Parafield Airport and the fact that control of airspace would take away from the Tower controller's concentration on their prime role of separating landings and departures. As traffic numbers invariably increase in the future, this would become even more of an issue.

Neither Gold Coast nor Canberra TCU has a busy metropolitan Class D airport (such as Parafield in the case of the Adelaide TCU) embedded in their airspace.

Neither Gold Coast nor Canberra TCU has a military airport (such as Edinburgh in the case of the Adelaide TCU) embedded in their airspace.

The presence of the traffic to and from these other airports adds significantly to the complexity and coordination required for a TCU such as Adelaide.

There is no comparison in the controller training requirements that were needed for the relocation of the Canberra and Gold Coast TCUs as compared to the training numbers required for the Adelaide TCU relocation (and still possibly Sydney TCU).

The fact that members of the Airservices Executive (and I would imagine their appointed working group) even tries to compare the relocation of Adelaide and Sydney TCUs in a practical sense, to Canberra and the Gold Coast, is very much a concern.

### **Consolidation of TCUs in the United States**

I think it is fair to suggest that as Australian air traffic numbers grow a comparison between what is currently considered best practice in the American Air Traffic Control system and what should be most suitable in the Australian environment, is a logical path to follow.

The United States FAA has for many years been progressing consolidation of some of their TRACONS (the USA equivalent of Australian TCUs).

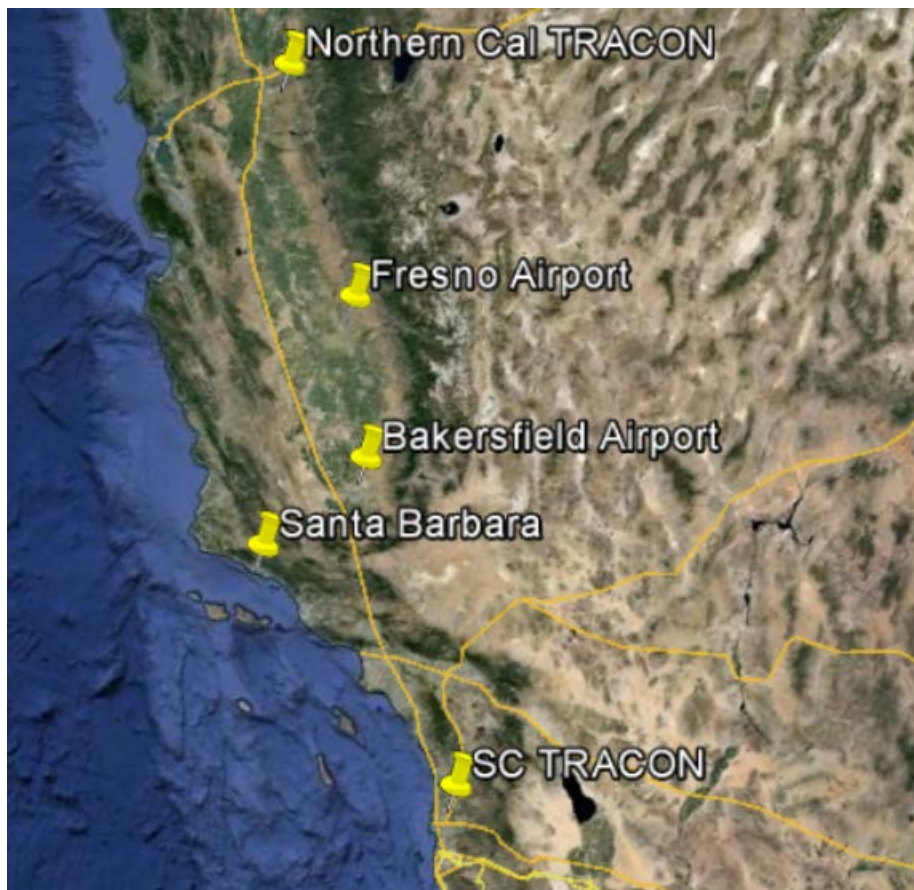
However this "consolidation" has to be put in context with what Airservices is planning in regard to the Adelaide TCU.

The USA perspective on consolidation is that where there are TRACONS whose airspace are in close proximity or actually adjoin, they are progressively combining these TRACONS into one larger entity.

For example the consolidated Boston TRACON combined the previous Boston and Manchester TRACONS into one TRACON situated basically half way between the two airports. **These airports are forty nautical miles apart not four hundred and fifty as in the case of the proposed relocation/consolidation of Adelaide TCU.**

The majority of USA airports (some 130 plus) of similar size, complexity and geographic disposition in relation to other TRACONS, to Adelaide, have the TRACON collocated with the parent tower. **There is no where that a TRACON (TCU) would be responsible for airspace some four hundred and fifty nautical miles away from its parent tower.**

The map below shows the location of TRACONS in California. The Northern and Southern California TRACONS are what the FAA refers to as “CONSOLIDATED TRACONS” and involve consolidating the terminal control services to a number of airports around these TRACONS into one TRACON. The thing to note is that the FAA has not consolidated Fresno TRACON (135nm from the Northern California TRACON), Bakersfield TRACON (220nm from the Northern California TRACON) or Santa Barbara TRACON (170nm from the Southern California TRACON)



Texas has TRACONS at Houston and Dallas with another ten TRACONS associated with smaller airports (similar movements to Adelaide) distributed across the state. The same goes for every other state across the United States.

There are no plans in the USA that I am aware of, to do anything other than close proximity consolidation of TRACONS.

One would assume that there are very valid reasons, redundancy in case of the failure of one location for example, for the FAA keeping the control of their Terminal Airspace either at or very close to the airports. Why Airservices management is so adamant that they know better and that controlling Terminal Airspace hundreds of miles away is a better way to go, should concern everyone.

One of the things that I have recognised on a number of visits to TRACONS in the USA that are a similar size and complexity to Adelaide TCU, is the importance the United States places on the link between the Tower and the surrounding Terminal Airspace. In a number of locations they go so far as to co-rate controllers on both Tower and TRACON functions and a controller works half their shift in the Tower and half in the TRACON.

The USA has their “Enroute” control centres as completely separate entities to any TRACONS; again Airservices management seems to know better.

### **Need to train extra staff as a result of TCU Relocation**

Airservices is regularly recruiting controllers from overseas. It is plausible to think that this is because they are short of controllers.

Airservices is continually training new controllers.

Airservices is supposedly preparing for the introduction of the next generation of Air Traffic Control infrastructure. The cut over to new equipment invariably requires extra Air Traffic Control staff.

Why would any company put themselves in a position where they have to train many extra Air Traffic Controllers and thus put more strain on their training system or, recruit even more controllers from overseas, purely to relocate TCUs, without a very obvious and clear reason for so doing?

The fact that very few Adelaide controllers are prepared to transfer to Melbourne with the TCU function, means there is a requirement to basically train a completely new complement of staff in order that the TCU relocation can occur. This is totally uncharted waters. If trainees fail to reach the required rating standard (this is far from uncommon), the pressure increases even more and there would not seem to be an escape mechanism other than to reduce the services currently provided by the Adelaide TCU.

### **What to do with Adelaide (Sydney/ Cairns) staff post relocation of the TCUs**

Airservices Executives have stated that no presently rated Adelaide controller will be forced to leave Adelaide. Those that wish to avail themselves of a redundancy package can, and those that don't will be kept as excess staff in Adelaide or Parafield Towers. One could cynically ask whether this is a move by Airservices management to bring Adelaide TCU controllers on side with the planned TCU relocation move.

**I would question why any business would proceed with a project that involves redundancies to staff or holding extra staff for an unknown period of time while at the same time they are training new controllers internally, to presumably capacity, and still requiring to recruit from overseas to meet their controller workforce demands.**

### **Removal of many hundreds of years of combined Adelaide TCU experience**

Again because of the almost total lack of current Adelaide TCU controllers expressing any wish to relocate permanently to Melbourne, if the planned relocation goes ahead, it will be staffed by an almost totally inexperienced Adelaide TCU workforce.

I don't believe this has ever been attempted on this scale, certainly in Australia and probably in the world. Again one has to ask, for what valid reason.

### **Conclusion**

The TCU consolidation project would seem to be a prime example of Airservices Management proceeding with something that is very difficult to justify, has a number of components to it that have no guarantee of going to plan, involves considerable payouts for redundancies or payment of staff to hold supernumerary positions for an indeterminable length of time while still training new controllers at maximum capacity and when it is impossible to see how it can provide a better service to the aviation community than present.

Combine this with the need to staff a Melbourne located Adelaide TCU with pretty much no Adelaide TCU experienced controllers and I would urge the committee to challenge Airservices and the Minister on this move.

Scott Bennett