

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft SES Implementing Rule on Airspace
Classification in the Lower Airspace
Enclosure 3



Please return this response sheet by **11 March 2005** to:

Jean-Luc Garnier,
Head of Regulatory Unit,
EUROCONTROL,
Rue de la Fusée, 96,
B – 1130 BRUSSELS,
Belgium

or by E-mail to: ru@eurocontrol.int

or by fax to +322 729 5190

NOTES FOR THE USE OF THE CONSULTATION RESPONSE SHEET

1. All comments on the associated Consultation material must be made using this response sheet. Comments submitted not using this sheet will be referred back to the originator.
2. As a minimum, Sections 1, 2, 4, 5 and 6 of the Response Sheet Main Page must be completed before returning the response.
3. Formal comments are invited on the contents of the Draft SES Implementing Rule on Airspace Classification in Lower Airspace (Enclosure 2). *Please do **not** submit comments on the explanatory material (Enclosure 1).*
4. Comments should be as specific as possible, including a reason/explanation for the comment and, where applicable, a proposed replacement text.
5. Each response return must be signed and dated by an appropriate person with the authority to authorise comments on behalf of the stated organisation.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft SES Implementing Rule on Airspace
Classification in the Lower Airspace
Enclosure 3



MAIN PAGE

1. ORGANISATION COMMENTING

Organisation Name:	European Gliding Union (EGU)	
Contact Name: ¹	Fransois van Haaff	
Contact Address:	Bornsestraat 59, 7556 BA Hengelo, The Netherlands	
Telephone/Fax:	+31-74-242.37.74	
E-mail Address:	fransois@interstroom.nl	

2. GENERAL RESPONSE²

Acceptable without amendment:

Acceptable but would be improved with amendments:

Not acceptable but would be acceptable with amendments:

Not acceptable under any circumstances:

<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input type="checkbox"/>

3. **SPECIFIC COMMENTS:** See pro forma over page.

4. COMPOSITION OF RESPONSE

This response consists of the following:

This Page **PLUS** (enter number) attached comments sheets.

5. **CONSENT TO PUBLISH NAME:** *I agree to my name/organisation being included in a list of those that responded to the Consultation:* **YES**

6. VALIDATION

Name: R. Stuck

Position: President EGU

Signature:

Date: 2005-03-07

¹ This is the person who is to be contacted directly to discuss or clarify the submitted comments. A single point of contact is requested.

² Show your overall acceptance position on Enclosure 2 by an 'X' in the appropriate response box.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft SES Implementing Rule on Airspace
Classification in the Lower Airspace
Enclosure 3



COMMENTS SHEET³

Organisation Name: European Gliding Union (EGU)

Form No. **of**

**Paragraph Reference
(Article/Recital etc):**

Comment:

1.a. The EGU is highly surprised to find FL 95 inserted for FL Z because of the serious consequences this has. In fact the EGU sees no reason for a FL Z at all. Without FL Z Class E airspace could be applied in all areas where a moderate density of IFR traffic allows this, obviating the use of airspace reservations, clearances, special arrangements or corridors.

1.b. The EGU should like to see proof of the reason why FL Z should be fixed at FL 95, if it has to be defined at all.

2. In Art. 2 the EGU misses an explanation of "another aviation authority".

3. In Art. 2 the EGU misses definitions of "Functional Airspace Blocks", "Flexible Use of Airspace" and "corridors". Until definitions of these notions are given, no proper comment can in fact be given.

4. Art. 4, section 4.2: what is meant with "a more restrictive airspace classification"?

5. The EGU misses the application of Transponder Mandatory Zones (TMZ)*, the good compromise between IFR and VFR in areas of moderate IFR traffic density.

* TMZ: an area in controlled airspace that can be entered without a clearance or radio contact, on condition that a working transponder is carried.

Reason(s) for Comment:

³ This pro forma may be copied as many times as necessary - ensure that each sheet is correctly numbered and that the main page shows the total number of pro formae you are submitting.

CONSULTATION RESPONSE SHEET

CONSULTATION TITLE: Draft SES Implementing Rule on Airspace
Classification in the Lower Airspace
Enclosure 3



FL 95 for FL Z is unacceptable for (VFR) gliding flight, especially over high ground like the Alps, the Apennines and the Pyrenees, because shallower operating areas mean less range and therefore less possibilities to reach suitable landing places.

Also the long distances flights practiced nowadays are only possible with reasonable altitude margins.

The EGU* is strongly opposed to unfounded restrictions to VFR flight, especially where IFR flight is not dense or rare, or where transponders are used by VFR flying aircraft (Transponder Mandatory Zones).

* The EGU: 70.000 glider pilots with 15.000 gliders, flying 550.000 km cross-country on a good day approximately.

Proposed Change/Text (where applicable):

1. Replace FL 95 by FL 135, at least over high ground.
2. After 4.3 add: "where the implementation of Class E is not possible".
3. Consequences of replies to questions above.