
Amendment to CAP 1032 Chapter 1

Department for Transport – Civil Aviation Authority

RPC rating: validated

Description of the measure

The measure amends CAP (Civil Aviation Publication) 1032 Chapter 1 regarding the licensing of Aerodrome Flight Information Service Officers (FISOs). FISOs provide advice and information to aircraft in flight. The measure will require Aerodrome Flight Information Service (FIS) units to have a performance based mechanism for monitoring and continually inspecting the competence of FISOs. The Civil Aviation Authority (CAA) hopes that this measure will allow for quick identification of inadequate competence, which may have implications for the safety of the public. Presently, under the policy, FISOs are assessed every second year on their professional competency in order to revalidate their licence. The CAA and industry members believe this review process is insufficient.

The CAA also considered the option of enforcing a prescriptive, rules-based system but felt this would be inappropriate given the variation between FIS units in the industry. Thus units will be given autonomy in determining the form of their evaluation mechanism, although they will be required to provide justification for their chosen scheme via their Safety Management System, with CAA oversight.

Impacts of the measure

The proposal highlights that accurately assessing the direct cost to FIS units of fulfilling the requirement is difficult due to the variations in the monitoring systems between units. In addition, some units already have an informal system in place. The costs to business consist of a one-off familiarisation cost to units, ongoing costs related to management of the competency scheme and the cost of printing out documentation detailing requirements for the scheme. The CAA states that the measure will affect all 32 FIS units that are in operation in the UK at present. The costs identified are as follows:

- Based on evidence from the Association of UK FISOs, familiarisation and implementation of the scheme is estimated to be 2 hours per FISO, at a wage rate, including uplift, of £14.45 per hour (derived from internet research on FISO job vacancies). This gives a one-off familiarisation cost of £925 in total for all 32 FIS units.

- The CAA estimates the ongoing costs of managing the scheme to be £5,543 per annum. This is based on an assumption that all 32 units contain six FISOs, which the CAA states is typical. The CAA assumes that FISOs will spend 2 hours per annum on administrative tasks related to the monitoring system.
- The IA states that the expected one off printing cost for all units is £30 and the total ongoing printing cost £29 per annum.

The potential benefits of the measure include improved public safety and reduced probability of an accident.

The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of zero. This will be a qualifying regulatory provision that will score under the business impact target.

Quality of submission

The IA provides sufficient detail of the breakdown of costs to business. Some of the estimates are supported by evidence. However, some figures rely on assumptions made by the CAA. The CAA offers no evidence regarding how the ongoing costs of the scheme and number of pages were derived. Given that the ongoing costs form a substantial amount of the direct costs to business, this is concerning. Furthermore, it seems unlikely that FISOs would spend only 2 hours per annum on training related to the scheme. Evidence should have been provided. The RPC suggests that for future IAs, the CAA support all figures with evidence or explains clearly why it is unable to do so.

The CAA has provided a discussion of the potential benefits of the measure arising from the avoidance of accidents. It has costed the potential impact of a worst case credible accident outcome. The CAA has asked for advice on the feasibility of including these benefits in the BIT. In order to do so, the CAA would need to provide a best estimate from the range of benefits. This would be the most likely point in the range. It would also need to identify which of the benefits were direct benefits to business as a result of the change. The estimates would also need to be well-evidenced, with a much higher level of evidence than currently provided.

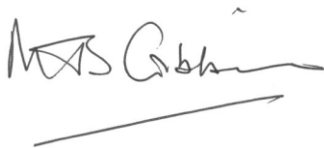
Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	£0.0 million

Business net present value	£0.0 million

RPC assessment

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated ¹	£0.0 million
Business Impact Target (BIT) Score ¹	£0.0 million



Michael Gibbons CBE, Chairman

¹ For reporting purposes, the RPC validates EANCB and BIT score figures to the nearest £100,000.