

Aero Club Letterhead

To: The Chief Executive Officer
Air Traffic and Navigational Services Company

ATNS_AIC44-2_Transponders_25_04_05

Fax: 011 392 3968

Date: 25 April 2005

Dear Me. Stander

Mandatory fitment of transponders – AIC 44.2

Bad Faith Negotiation

We view with considerable disappointment and frustration ATNS's cavalier attitude to the initiative recommending the mandatory installation of transponders on recreation aircraft outside of controlled airspace.

We, the Aeroclub, were called to a meeting at ATNS on the 14th February 2005 to discuss the above issue and presented ourselves at the appointed time and place. At this meeting it was agreed that in view of the complexity of the issue, i.e. Technical, Practical, Cost and others that an A.I.C. be sent out and presented in such a way as to invite response from the affected parties and enable all parties to conduct the necessary research.

Among other things agreed;

- * Because of the complexity and far reaching consequences, the publication of the A.I.C. would not follow the usual childish ploy of requiring a response within a ridiculously short period as is often practiced by the CAA, particularly where price increases are concerned, with public holidays shortening the process.
- * It would require a period of some months for some response, probably three at least, since if this needless burden was to go ahead it could still be mandated to fall in this year.
- * It would be worded in such a way as to be a recommendation and inviting comment.
- * Further meetings would be held to review the situation when the relevant research had been completed.

WHAT REALLY HAPPENED?

- * A document appeared with a response time of 30 days with not one but two long weekends in-between.
- * This document was presented as a directive, i.e. **it would happen 2005.**
- * It contained a number of other parameters not discussed at the meeting on the 14th of February, that now requires more explanation, including reference to CTA's and mode A transponders. What is the use of this to ACAS which is one of the reasons supposedly put forward for this additional control that nobody has yet been able to give a plausible explanation for.
- * In spite of the above, Aero Club of South Africa and its voluntary organisations, please note voluntary, were ready in time, responded in writing with the limited information it was possible to obtain in the time available, and set a meeting date to enlarge on our response with the CAA. This date had to be changed as the CAA could not accommodate us before the response date as the Commissioner was engaged in some form of hearing which understandably had to take priority. In addition, your designated respondent was advised of the change of date and told to communicate this to the others involved, including the CEO and the others who were present at the original meeting.
- * Regrettably not one of the original cast from ATNS attended this meeting, and the individual who did attend attempted to convince the meeting that the document was worded purely to invite comment. It was pointed out that the actual wording conveyed a totally different message. This he could not defend.
- * The attitude as expressed in this document, far from inviting constructive comment, has created outpourings in writing and on the web site AVCOM, an avalanche of destructive invective which includes the threat that several aircraft will infringe the airspace on final approach to the active runway at JIA at the most inopportune time. Of course having been equipped as demanded we will all expect to have full use of all the major airfields.

GENERAL COMMENT.

Frequently, when in conversation with ATNS, the term Congested Airspace is mentioned as a defense against some of the additional controls to be imposed. To experience congested airspace and competence, it is suggested that a visit to O'Hare or Heathrow airports be undertaken. Does the constant threat of expanding controlled airspace in South Africa reflect a level of incompetence in our midst, and if so is this the fault of management, controllers or airline pilots? With reference to the Eastern Cape and even Cape Town by comparison with the above airports, each airliner arrival almost constitutes a local event. We would further point out that the DBN TMA is larger in extend than Heathrow TMA which includes the other major airports such as Gatwick, Stanstead, and Luton

We strongly urge you to take cognizance of the fact that the section of the aviation community which we represent has now reached the stage of total exasperation with the over regulation and dictatorial money grabbing destructive forces of the parastatals ATNS,CAA,SAWS and to a lesser extent ACSA. This is leading to rapid growth in the rogue element who now threatens total defiance have no hesitation in flying where they

like, when they like, maintaining complete radio silence, with themselves and in some cases their aircraft remaining unlicensed.

We trust by now you have appraised yourself of our response and we will be hearing from you at some future date.

Finally, on a different subject, ie the issue of en route fees et al which is also under discussion with ATNS, we have requested and were promised the breakdown of the statistic expressing the fact that GA contributes less than 1% of the revenue but 35% of the cost. Unfortunately this has not been forthcoming.

Stan Oliver

Chairman Aeroclub of S.A.