UK Civil Aviation Authority

Unmanned Aircraft Systems (UAS) Traffic Management Certification Consultation

CAP3271 | First Edition

Published by the Civil Aviation Authority, 2026

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This document uses the term “Unmanned” throughout rather than “uncrewed”. Unmanned is the terminology currently used within legislation and regulation; given this, the term has continued to be used for these documents. There is work ongoing at the CAA to review the correct use of these terms, and this will be reflected in any further iterations of this document.

First published 2026

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The latest version of this document is available in electronic format at: www.caa.co.uk

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Executive Summary

Unmanned aircraft system traffic management (UTM) is critical to the safe and scalable integration of unmanned aircraft systems (UAS) into UK airspace, serving as the equivalent of traditional air traffic management (ATM) for unmanned aviation. UTM provides the infrastructure and services needed to manage these operations in real time, ensuring flight authorisation, geo-awareness and conflict management.

Current ATM regulations under UK Regulation (EU) 2017/373 do not account for UTM service providers (UTMSPs) and UAS data service providers (UDSPs) (more information on these types of providers is contained within Chapter 2), given that they were not considered when the regulation was written. Certification aims to provide a structured assurance framework requiring service providers to comply with safety requirements, mitigating the risk of unregulated actions which could otherwise compromise safety, including leading to a mid-air collision (MAC). The CAA (Civil Aviation Authority) proposes introducing certification requirements for UTMSPs, ensuring they meet equivalent and proportionate safety standards to air navigation service providers (ANSPs). This approach aligns with the strategic objectives in the Airspace Modernisation Strategy (AMS)[1] and BVLOS Roadmap[2], enabling routine Beyond Visual Line of Sight (BVLOS) operations by 2028.

This consultation includes a wide range of proposals that could support the certification of UTM services, and the wider UAS sector. We have therefore developed our proposals to maintain existing regulatory structures, and to address targeted safety, security or user concerns. To help align UTM with traditional ATM and the operations at scale of UAS, we are proposing changes to the current version of UK Regulation (EU) 2017/373. These recommendations address what we propose should, or should not be, applied to UTM service provision, and what annexes may need amending. This may result in the amendment of UK Regulation (EU) 2017/373. This consultation may be utilised to determine if this is the best way forward and inform the drafting of amendments.

This consultation has been released alongside the UTM Policy concept and UTM concept of operations (ConOps) to provide context and the CAA's view of the future of UTM. We are also asking for feedback on these documents to inform future development.

[1] Airspace Modernisation Strategy | UK Civil Aviation Authority

[2] CAP3182: Future of Flight BVLOS Roadmap | UK Civil Aviation Authority

Table 1: Summary of UK Regulation (EU) 2017/373 Proposals By Annex

Annex	Part	Subpart. Section	Proposal for UTMSPs	Proposal for UDSPs
III	ATM/ANS.OR	A	Applicable	Applicable
		B	Applicable	Applicable
		C	Not Applicable	Applicable
		D	Applicable	Applicable
IV	ATS	A.1	Applicable	Not Applicable
		A.2	Amend	Not Applicable
		A.3	Amend	Not Applicable
		B.1	Applicable	Not Applicable
V	MET	A.1	Not Applicable	Amend
		A.2	Not Applicable	Amend
VI	AIS	1	Not Applicable	Not Applicable
		2	Not Applicable	Not Applicable
		3	Not Applicable	Not Applicable
VII	DAT	A.1	Not Applicable	Amend
		A.2	Not Applicable	Amend
		B.1	Not Applicable	Amend
VIII	CNS	A.1	Applicable	Applicable
		B.1	Amend	Amend
IX	ATFM	1	Not Applicable	Not Applicable
		2	Amend	Not Applicable
X	ASM	1	Not Applicable	Not Applicable
XIII	PERS[3]	A.1	Applicable	Applicable
		A.2	Applicable	Applicable

[3] Note that whilst this annex and its subparts are applicable, they have not been addressed in this consultation, as explained in 2.23.

Annex	Part	Subpart. Section	Proposal for UTMSPs	Proposal for UDSPs
		A.3	Applicable	Applicable
		A.4	Applicable	Applicable

These proposals build upon current ATM/ANS regulatory principles, including safety, efficiency and an understanding of the role of innovation. These proposed changes aim to simplify and strengthen regulations, leading to a world-leading safe and effective air traffic control system, which enables both manned and unmanned aviation technology to co-exist in the same airspace.

A consultation reply document, including a summary of feedback and our final recommendations, will be published in due course after responses have been reviewed. The proposals set out in this consultation constitute the CAA's current view on possible changes to the relevant regulatory framework. If legislative change is required to deliver these proposals, we will submit our final opinion and instructions to the Department for Transport (DfT), who will consider whether to implement our proposals in a statutory instrument, or the extent to which, depending on the passage of the Civil Aviation Bill through Parliament, the CAA may take forward measures under powers conferred on them by that Bill

Chapter 1

Introduction

This chapter sets out the context and objectives of the CAA's proposals for developing certification for UTMSPs. It summarises the benefits we are aiming to enable and the range of existing regulation that we consider needs to be adhered to or potentially revised. It sets out our high-level regulatory objectives and the logic behind our proposed regulatory solution. Finally, it highlights the importance of consultation feedback and provides a summary of how to respond.

Context

1.1 The use of UAS to conduct a wide range of operations across the commercial, public and recreational sectors continues to rise, presenting new and exciting opportunities. In particular, the question of how to manage the expected volume of traffic within UK airspace, not only between unmanned systems but also between manned and unmanned systems, is unprecedented and requires innovative and future-proof solutions from regulators and industry experts.

1.2 Over the coming years, we expect the UAS sector to grow as even more individuals and businesses harness its benefits. This will support our economy to grow and create new jobs, benefitting us all. Analysis commissioned by the UK government predicts that UAS revenue between 2025 and 2050 could be between £20.3bn and £66.2bn[4].

1.3 However, the challenge remains as to how UAS can safely and efficiently integrate into the existing operational environment. In Baringa's *New Horizons: the case for public sector drone investment* report[5], nearly 700,000 civil UAS are projected to be flying in UK skies by 2035. Evidently, UK airspace will become more complex across time and so concerns surrounding safety and efficient airspace coordination are growing.

1.4 Traditional ATM frameworks were not designed to handle the complexity of high-density, often automated UAS operations. Therefore, the addition of a UAS traffic management (UTM) system, an ATM/ANS (Air Navigation Services) capability, that addresses the specific requirements of UAS service provision, is required to support the safe, efficient, and scalable integration of UAS into UK airspace.

[4] Future of Flight Scenarios Futures Research Report

[5] New horizons: The case for public sector drone investment | Baringa

1.5 As defined in UK Air Traffic Management Vocabulary CAP 1430[6], UTM is "a specific aspect of air traffic management which manages UAS operations safely, economically and efficiently through the provision of facilities and a seamless set of services in collaboration with all parties and involving airborne and ground-based functions".

1.6 Part of this engagement will require us to explore options in drafting new policy to ensure that the UK remains as a pioneer of innovative aviation and is on track to fulfil the UK's Future of Fight (FoF) programme.

1.7 Alongside this consultation, we are publishing our UTM policy concept and UTM ConOps.

1.8 The UTM policy concept lays out a proposed regulatory framework that enables the safe, secure, efficient and scalable integration of UAS into UK airspace, in simple, high-level terms for a wide range of stakeholders involved in UAS services.

1.9 The UTM ConOps provides a foundational reference point for the detailed implementation and development of UTM services throughout the UK, including its operational, regulatory and technical requirements. Developed from the perspective of intended users, it sets out both qualitative and quantitative system attributes. It is expected to evolve as part of the iterative, operational testing and evaluation process, as well as in response to future operational experience and technological advancements.

1.10 Both the UTM policy concept and UTM ConOps are intended to guide and assist service providers and UAS operators to understand the scope and proposed requirements of UTM service and data provision and its applicability to risk-mitigated, safe air operations. They inform the proposals presented in this consultation and will be updated following consideration of the responses.

1.11 As published in our UTM policy concept and UTM ConOps, we propose creating the requirements for the certification of UTMSP's, which will provide the set of airspace management services that are intended to ensure safe and efficient operations of UAS.

1.12 Their intended role will be the utilisation of assured data to provide services that support real-time or near-real-time organisation, coordination, and management of UAS operations. UTMSPs shall identify communication systems and performance-based navigation capabilities required for safe and interoperable operations.

[6] CAP1430: UK Air Traffic Management Vocabulary | UK Civil Aviation Authority

1.13 It is proposed that UTMSPs shall require certification to provide mandatory[7] services for UAS such as flight authorisation, geo-consciousness and conflict management services. UTMSPs and/or Unmanned aircraft systems data service providers (UDSPs) may require certification or approval to provide other services, including UAS registration and validation and meteorological services.

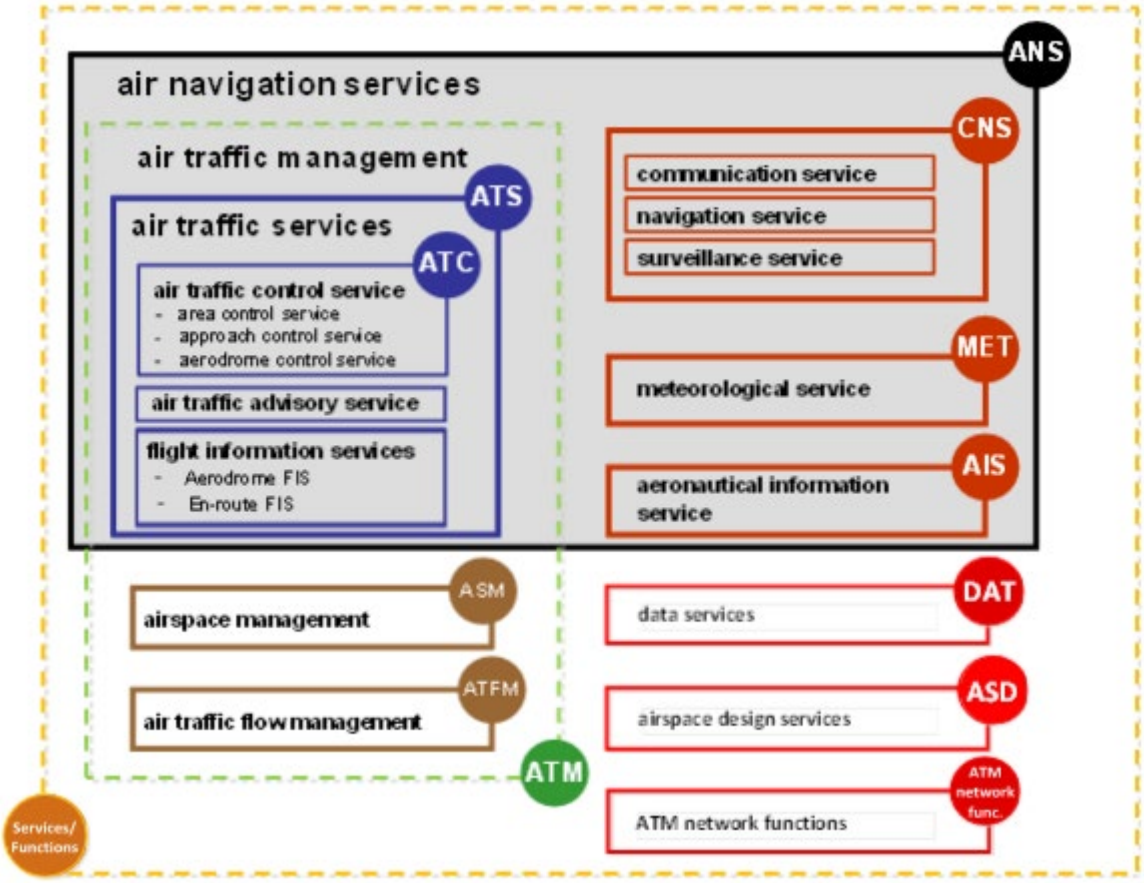
1.14 UK Regulation (EU) 2017/373 establishes the detailed technical and operational legal framework governing the provision of ATM, ANS, associated communications, navigation and surveillance (CNS) and aeronautical meteorological services (MET). It sets out harmonised requirements for the certification, organisation, management and oversight of service providers, including mandatory safety management systems, quality management arrangements, security controls, and personnel competency and training requirements. The Regulation operates alongside other legislation, as listed below in 1.20, and UK CAA acceptable means of compliance (AMC) and guidance material (GM), which together form part of a wider, performance-based safety framework.

1.15 As per the CAA's AMS and the International Civil Aviation Organization's (ICAO) guidance[8], UTM is considered a subset of ATM/ANS. However, the current regulatory framework for air traffic management service providers (ATMSPs) and ANSPs in UK Regulation (EU) 2017/373 does not make specific provision for the role of UTMSPs, nor does it set out the additional requirements with which a UTMSP may need to comply.

[7] If an entity provides any one (but not necessarily all) of the mandatory UTM services, they are automatically classified as a UTMSP. Under an established UTM system, this renders them in need of certification in order to ensure that providers of traffic management for UAS are reliable and competent.

[8] UTM Framework Edition 4.pdf

Figure 1: Scope of Services in UK Regulation (EU) 2017/373



1.16 Certification aims to provide a structured assurance framework requiring service providers to comply with safety requirements, mitigating the risk of unregulated actions which could otherwise compromise safety, including leading to a mid-air collision (MAC). Rulemaking is proposed to incorporate the role of UTMSPs in regulation and establish a framework for the certification of UTMSPs that clearly defines the regulatory requirements with which they must comply.

1.17 Delivery of UTMSP Certification is a necessary building block for the delivery of the CAA's commitments, namely:

a) **Airspace Modernisation Strategy (CAP1711)** – delivery of this is aligned with the ICAO's Global Air Navigation Plan (GANP)[9].

b) **FoF BVLOS Roadmap (CAP 3182) –** this is crucial for scaling innovation and transforming how UAS contribute to public and commercial services.

[9] Global Air Navigation Plan (GANP)

Regulatory Options

1.18 In determining the need for an appropriate methodology to address the lack of a regulatory framework for the certification of UTMSPs, we considered the following options:

a) **Option 1 - Rulemaking**

(1) **Option 1a.** Create a new regulation for the certification of UTMSPs, cross referencing to existing requirements in UK Regulation (EU) 2017/373 as applicable. If an existing certified ANSP is providing services to UAS operators, they would be required to demonstrate compliance with the applicable requirements within the new regulation, in addition to their existing UK Regulation (EU) 2017/373 ANSP certificate.

(2) **Option 1b - Amend UK Regulation (EU) 2017/373** for the certification of UTMSPs and for UDSPs. ANSPs providing additional services to UAS operators would also be required to demonstrate compliance with an additional annex before those services could be included within their existing ANSP certificate. This option would ensure that all services are under a UK Regulation (EU) 2017/373 certificate, regardless of the type of service provision.

b) **Option 2 - Amend AMC/GM to UK Regulation (EU) 2017/373** to deliver a UTMSP certification framework. Expand existing ANSP requirements to include those services that will be provided by a UTMSP. An ANSP that can provide these additional services to UAS operators would also need to demonstrate compliance with the additional requirements before those services could be included within their existing ANSP certificate.

c) **Option 3 – Do Nothing**. There would be no regulatory pathway to certify a UTMSP.

1.19 The CAA's proposal is that Option 1 (Rulemaking) should be pursued as it is the only viable option that can accommodate the delivery of UTM services by UTMSPs at the scale required (i.e. outside of trial environments or Temporary Reserved Areas).

a) Option 1b is the proposed preferred over Option 1a, to ensure the certification of UTMSP is held to an equivalent and proportionate safety standard as ATM/ANS providers, reflecting the decision of the Airspace Modernisation Strategy for UTM to be a subset of ATM.

b) Option 2 was discounted, as analysis concluded that updating AMC/GM without changing corresponding regulatory requirements for the certification of UTMSPs would not be possible.

c) Option 3 was discounted, as it would not enable certification of UTMSPs to the safety standard required.

d) Other international examples of certification of UTMSPs were also discounted, due to the ambition of integration in UK airspace and the lack of available detail on such processes.

1.20 We are considering whether there are other regulations or legislation that may be applicable or may require amendment (more detail can be found on these in Chapter 4). These may include:

a) UK Regulation (EU) 550/2004 - The Service Provision Regulation (Designation)

b) UK Regulation (EU) 1206/2011 – Aircraft Identification for Surveillance for the Single European Sky

c) UK Regulation (EU) 1207/2011 – Performance and the Interoperability of Surveillance Regulation

d) Air Navigation Order 2016

e) Railways and Transport Safety Act 2003

f) UK Regulation (EU) 923/2012 Rules of the Air (SERA)

1.21 This consultation sets out our proposed approach to include sufficient regulatory measures for UTM. These proposals have been informed by industry engagement with identified potential UTMSPs, alongside the CAA's wider technical knowledge and regulatory vision.

1.22 All current annexes contained within UK Regulation (EU) 2017/373 and their regulatory requirements have been reviewed for their potential applicability to UTM service provision. The UK Regulation (EU) 2017/373 regulations for certifying ATM and ANS have been used as the framework to develop proposals for the certification of UTMSPs. This identified that there are requirements contained in the annexes that the CAA considers are relevant and applicable to UTMSPs.

1.23 Some annexes contain elements the CAA considers are applicable to the way UTM delivers services and data, however these annexes are only applicable to a single provider (part MET and part AIS). Other annexes contain relevant requirements that address how UTMSP's would provide some services but are located in annexes that are not applicable to UTM (part ASM and part ATFM). Other annexes contain requirements, that whilst considered applicable, are not drafted in a way that the CAA considers appropriate for UTM service provision.

1.24 In both these cases, the CAA proposes that the requirements, drawn from annexes considered relevant but inapplicable, and the requirements that would

require redrafting, should form the basis of additional general and/or specific requirements for the proposed amendments to certify UTMSP's and UDSP's.

1.25 This consultation only refers to possible changes to the legislation itself. Further details on each regulatory element and its application would be included within updates to the AMC and GM, which themselves would be consulted on at a later stage of our regulatory process.

1.26 Our view is that the coming years are the critical juncture to create the regulatory framework for UTM, enabling the sector to benefit from increased regulatory stability and operational safety in the future. Without UTMSP certification, UTMSPs would not be certifiable and so would not be able to operate outside of tests and trials due to safety concerns. This would significantly hinder UAS operations, due to the absence of a safe and efficiently managed airspace. Therefore, the CAA considers changes are required to enable scale and business-as-usual for industry. The need to act now is driven by the expectation that UTMSP's will wish to operate without SUA (Special Use Airspace) in integrated environments and a regulatory pathway to certification will need to be in place when that occurs.

1.27 Our proposals and approach are aligned to the proposals and recommendations of the Law Commission's Aviation Autonomy project[10].

1.28 The existing ANSP certification framework has an associated scheme of charges. If our proposals in the consultation are implemented, proposed changes to the scheme of charges will be consulted on to include new providers.

1.29 Through these proposed changes, we aim to create a globally leading, future-proofed regulatory framework that enables the UAS sector to deliver transformational benefits to businesses and lives.

Our Regulatory Objectives

1.30 The proposals in this consultation aim to deliver 8 high-level regulatory objectives:

a) Require UTMSPs to obtain a certificate from the CAA to provide UTM services.

b) Define the scope of services provided by a UTMSP that require certification.

c) Establish the applicability of general ATM/ANS requirements to UTMSPs.

d) Establish any additional requirements needed for UTMSPs.

e) Define the requirements placed on software/systems used by UTMSPs and personnel involved in provision of UTM services.

f) Define the responsibilities of the CAA and Secretary of State with regard to UTMSPs.

[10] Aviation autonomy – Law Commission

g) Define enforcement, civil liability and criminal liabilities with regard to UTMSPs.

h) Require certification for the provision of data. This could take the form of a UDSP (see chapter 2 for more detail) or if deemed necessary, the concept of a Common Information Service Provider (CISP), for example.

1.31 UTM advances the CAA's core objectives by ensuring the safe, secure, and efficient integration of unmanned aircraft into UK airspace – part of the wider FoF Vision. It provides a risk-based regulatory framework that supports scalable operations, including BVLOS, while maintaining high safety standards and interoperability with existing domestic and international air traffic systems.

1.32 As a result of maintaining a safer and more efficient airspace, UTM contributes to government priorities by driving economic growth through commercial drone applications in sectors like logistics, agriculture and emergency response. UTM also enhances public safety and emergency response capabilities and supports environmental sustainability through scalable low-emission operations. Furthermore, UTM underpins the UK's global competitiveness strategy in advanced aviation technologies and fosters innovation by promoting digital real-time data exchange.

Document Summary

1.33 This consultation takes the following structure:

- **Chapter 1** sets out the context of the CAA's review of UK ATM/ANS and UTM regulation. It provides an overview of our strategic objectives and the structure of this document.
- **Chapter 2** presents a high-level view of the role and services provided by UTMSPs and UDSPs, and how the CAA proposes certification requirements for these services could be embedded into UK Regulation(EU) 2017/373. It also contains some additional cross-cutting questions which are aimed at providing the CAA with more information about how industry currently operates, which can be used to develop more informed proposals.
- **Chapter 3** lays out our regulatory proposals, first for UTMSPs, and then for UDSPs or other data service providers, within UK Regulation(EU) 2017/373. The chapters break down UK Regulation(EU) 2017/373 by its applicable annexes, with each proposal including our rationale and logic behind it, demonstrating how the proposals fulfil the regulatory objectives mentioned in 1.30. To help ensure this Regulation is correct and applicable for UTMSPs, we may propose that changes be made to the articles within the Regulation, alongside the annexes whose descriptions are listed in the table below.

Table 2: UK Regulation (EU) 2017/373 Annex Description By Annex

Annex	Part	Description
I	DEFINITIONS	Definitions of terms used in Annexes II to XIII
II	ATM/ANS.AR	Requirements for competent authorities – oversight of services and other ATM network functions
III	ATM/ANS.OR	Requirements for ATM/ANS service providers
IV	ATS	Requirements for providers of air traffic services
V	MET	Requirements for providers of meteorological services
VI	AIS	Requirements for providers of aeronautical information services
VII	DAT	Requirements for providers of data services
VIII	CNS	Requirements for providers of communication, navigation, or surveillance services
IX	ATFM	Requirements for providers of air traffic flow management
X	ASM	Requirements for providers of airspace management
XIII[11]	PERS	Requirements for service providers concerning personnel training and competence assessment

- **Chapter 4** details our regulatory proposals in other supplementary regulatory legislation which may either require change or be applied to UTM.

Responding to this Consultation

1.34 The consultation process is an integral part of CAA and government's policy development approach, allowing us to understand the impact of possible policy changes on stakeholders. We welcome responses to the consultation from any stakeholder potentially impacted by these proposals, including recreational and commercial UAS remote pilots/operators, potential UTMSPs, external data providers, and UAS service providers, amongst others.

1.35 The consultation is open until 23:59 28th August 2026. Responses can be provided via Citizen Space.

[11] Annexes XI and XII have been repealed.

1.36 Our strong preference is that you complete the online consultation. We understand that some stakeholders prefer not to be constrained by the questions alone and will want to send a self-contained response. While we will accept these submissions, we ask that they are structured around our questions. Otherwise, we will not be able to analyse the submissions in the same way that we analyse the online responses.

1.37 We will assume that all responses can be published on our website. When you complete the online consultation, there will be an option for you to hide your identity or refuse publication. (In any event, your email address will not be published.) In the interests of transparency, we hope people will not refuse publication. If you do send us a submission and it includes any material that you do not want us to publish, please also send us a redacted version that we can publish. You should be aware that information sent to and therefore held by the CAA is subject to legislation that may require us to disclose it, even if you have asked us not to (such as the Freedom of Information Act and Environmental Information Regulations). Therefore, if you do decide to send information to the CAA but ask that this be withheld from publication via redacted material, please explain why, as this will help us to consider our obligations to disclose or withhold this information should the need arise.

1.38 If you would like to discuss anything about how to respond to the consultation, please email airspacemodernisationdelivery@caa.co.uk.

1.39 Once the consultation has closed and we have considered feedback, we will publish our consultation reply document. This will summarise the feedback and set out our final proposed policy positions. If legislative change is required to deliver these proposals, we will submit our final opinion and instructions to the Department for Transport (DfT), who will consider whether to implement our proposals in a statutory instrument, or the extent to which, depending on the passage of the Civil Aviation Bill through Parliament, the CAA may take forward measures under powers conferred on them by that Bill.

Chapter 2

Overview of Proposals

This chapter provides a technical overview of the proposed roles of UTMSPs and UDSPs, including their proposed descriptors and the proposed services they would provide to support the overall air traffic management space. References to UTMSPs and UDSPs in this consultation are to these proposals. This informs the certification requirements that this consultation seeks to address. It also provides a high-level summary of the proposals made for each relevant annex of UK Regulation (EU) 2017/373. A more detailed set of proposals, rationale, and questions for industry can be found in the following chapter which goes through the regulation annex by annex for both UTMSPs and UDSPs.

UTMSPs

2.1 Through engagement with industry, we have identified that UTM would be applicable to two types of UTMSPs, and have proposed descriptors below to provide clarity:

a) **Type A1**: UTMSP providing a fully automated ATM services, which includes an Air Traffic Service (ATS) with no Human in the Loop (HITL), but where there may be a Human over the Loop (HoVL) in a safety critical or safety related function. A service provider that uses a fully automated system that manages UAS operations through the provision of facilities and a seamless set of services in collaboration with all parties and involving airborne and ground-based functions.

b) **Type A2**: UTMSP providing ATM services, which includes an Air Traffic Service (ATS), using appropriately licensed and trained individuals such as ATCOs (Air Traffic Control Officers) or FISOs (Flight Information Service Officers) to provide those ATM services as Humans in the Loop (HIL). A service provider that manages UAS operations through the provision of facilities and a seamless set of services in collaboration with all parties and involving airborne and ground-based functions.

2.2 The CAA proposes that the provision of any of the services identified in the UTM Policy concept shall be provided by a certified UTMSP or ANSP. The explanation of

these services can also be found in the UTM Policy concept which should be read in conjunction with this section[12]. The proposed services are summarised below:

2.3 **Flight Authorisation Service:** Set of services that provides airspace authorisation from the delegated State authority to the UAS operator to enact airspace restrictions for UA. This can function as a necessary requirement to enable strategic deconfliction capability for UAS interactions in the same area of conflicting pre planned flight paths. There would be two elements to this:

a) **Airspace Authorisation:** A capability that provides airspace authorisation from the delegated State authority to the UTMSP to establish and promulgate airspace restrictions for UAS to restrict access to geofenced areas (geofencing) or restricting the UAS to a geographically defined area (geo caging). This can function as a strategic deconfliction service for UAS interactions in the same area of conflicting flight paths.

b) **Flight Planning**: A process that, prior to the flight of a UAS, arranges and optimises intended operational volumes, routes and trajectories utilising the information provided by the operator as part of a UAS flight plan. This element of airspace management and planning will be trajectory centric and will form an important part of Strategic Deconfliction (see the UTM Policy Concept for further information). Shared information will enable optimised operations for multiple UAS operating in the same airspace. The provision and exchange of real-time digital flight plan data will be used in compliance monitoring and will allow much better tactical management by service providers.

2.4 **Geo-Consciousness[13]:** A service where the UTMSP monitors the flight path of any UAS that has filed a flight plan and provides information and/or advice to ensure the UAS (or the operator) is advised of the proximity, of the UAS, to the boundary of airspace volumes it cannot enter or leave. This is done by restricting access to geofenced areas (geofencing) or restricting the UAS to a geographically defined area (geo caging) when the UAS is not adhering to the flight planned route, and/or leaving the airspace volume provided by the operator for that flight. Further details relating to this proposal are set out below:

a) The requirement to monitor the flight of the UA to confirm it is in compliance with its notified flight intent will be undertaken by a Compliance Monitoring function (see the UTM Policy Concept for further information), which provides real-time monitoring and alerting of non-conformance to intended operational volumes,

[12] Please provide any comments on the services within your response to the UTM Policy Concept

[13] Where this data is created by a UDSP and shared, unmodified, by the UTMSP with the UAS operator the UTMSP will not need to become a UDSP. Where this data is taken from a source that is not a UDSP, or the data is combined with other data or modified, the UTMSP may need to meet additional regulatory requirements under UK Regulation (EU) 2017/373.

routes, or trajectories to the UAS operator or remote pilot. It shall alert, in real time, the non-compliance of a UAS with the flight authorisation issued and alert the operator and other service users when deviations from the volume of approved airspace occur. This may be combined with a Traffic Separation capability (see the UTM Policy Concept for further information) to allow traffic information and or separation instructions to be passed to the UAS to avoid conflictions with other aircraft because of non-conformance with the notified flight intent.

b) The service provider will need to access information and data that provides terrain and obstacle data (information) appropriate and necessary for meeting the SORA requirements of individual UAS operations or for supporting the UTM systems needs for the provision of deconfliction or flight planning services and Aeronautical Information Services/Aeronautical Information Management (AIS/AIM) data necessary for the safety, expeditious and orderly operation of aircraft using the service. Where this data is created by a UAS Data Service provider (UDSP) and shared, unmodified, with the UAS operator the UTMSP will not need to become a UDSP. Where this data is taken from a source that is not a UDSP, or the data is combined with other data or modified the UTMSP may be required to meet additional regulatory requirements under UK Regulation(EU) 2017/373.

2.5 **Conflict Management Services:** Any UTM service will need to safely demonstrate a conflict management capability to tactical separate aircraft through the provision of appropriate ATS comparable services. This will provide real-time information about other aircraft so that UAS can apply the relevant requirements of SERA when interacting with them. The separate components of this are comprised of:

a) **Traffic Information Service:** A surveillance-based service where information is provided to the UAS regarding other air traffic which may be in proximity to the position or intended route of flight and to help the UAS avoid a collision by making the UAS situationally aware of known traffic through a Recognised Air Traffic Environment (RATE).

b) **Traffic Separation Service:** A surveillance-based service which provides specific surveillance derived traffic information and issues instructions to the UAS to achieve planned deconfliction minima against all known aircraft. This may form one component of a Traffic Management Service.

UDSPs

2.6 Through engagement with industry, we have identified that there are two potential types of entities that may provide data to UTM stakeholders. As it is anticipated that these entities will provide data and information that is critical to the safe operation of

the UAS, it is the CAA's view that these UDSPs will require certification. This is in line with the certification of entities that provide safety-critical navigation data to manned aircraft, for example. The proposed descriptors of these two types are:

a) **Type B1**: A service provider that supplies CNS/aeronautical/meteorological data required to conduct UAS operations directly to UAS operators' or UTMSPs' system(s).

b) **Type B2**: A service provider that supplies CNS/aeronautical/meteorological data required to conduct UAS operations directly to a Remote Pilot or UTMSP Type A2 ATCO/FISO.

2.7 For both type B1 and B2, if the service provider makes operational decisions relating to the UAS's flight, then it would also become a UTMSP type A1 or A2.

2.8 As the scope of data products that could potentially be provided to UTM stakeholders is vast and likely to increase in future, this consultation focuses on data that contributes to the safe operation of aircraft, and/or which is used to provide a SORA safety mitigation.

2.9 In relation to common information service (CIS), the CAA considers that the certification pathway set down for UDSP certification may apply to the certification of a CISP. As such, the function of a CISP may also be required to undergo certification under the UK Regulation (EU) 2017/373 framework.

2.10 We consider a discovery synchronisation service (DSS) to be a necessity for UTM-to-UTM and UTM-to-ATM functions, but that it is not a subset of UDSPs. Proposed certification requirements around a DSS can be found in section 3.44.

List of Proposals

2.11 The following annexes contained in UK Regulation (EU) 2017/373 are currently the ones used to certify ATM/ANS providers. Therefore, these annexes were identified as potentially applicable to a UTMSP's or UDSP's certification and form the basis of the recommendations made in this consultation.

Table 3: UK Regulation (EU) 2017/373 Proposed Requirements

Annex[14]	Part	Subpart. Section	Proposal for UTMSPs	Proposal for UDSPs
III	ATM/ANS.OR	A	Applicable	Applicable

[14] Annexes I and II have not been considered here in full detail given their role as supplementary annexes. However, they will require update depending on the changes made to other annexes.

Annex[14]	Part	Subpart. Section	Proposal for UTMSPs	Proposal for UDSPs
		B	Applicable	Applicable
		C	Not Applicable	Applicable
		D	Applicable	Applicable
IV	ATS	A.1	Applicable	Not Applicable
		A.2	Amend	Not Applicable
		A.3	Amend	Not Applicable
		B.1	Applicable	Not Applicable
V	MET	A.1	Not Applicable	Amend
		A.2	Not Applicable	Amend
VI	AIS	1	Not Applicable	Not Applicable
		2	Not Applicable	Not Applicable
		3	Not Applicable	Not Applicable
VII	DAT	A.1	Not Applicable	Amend
		A.2	Not Applicable	Amend
		B.1	Not Applicable	Amend
VIII	CNS	A.1	Applicable	Applicable
		B.1	Amend	Amend
IX	ATFM	1	Not Applicable	Not Applicable
		2	Amend	Not Applicable
X	ASM	1	Not Applicable	Not Applicable
XIII	PERS[15]	A.1	Applicable	Applicable
		A.2	Applicable	Applicable
		A.3	Applicable	Applicable
		A.4	Applicable	Applicable

[15] Note that whilst this annex and its subparts are applicable, they have not been addressed in this consultation, as explained in 2.23.

Question 1: *Do you agree with the proposed roles and descriptors for UTMSPs and UDSPs? Are they clear and workable in practice?*

Chapter 3

Proposed Requirements for UTMSPs and UDSPs in UK Regulation (EU) 2017/373

This chapter explores each relevant annex of UK Regulation (EU) 2017/373, providing proposals and rationale for how it could be applied or amended to accommodate for the UTM architecture and system, proposed in the UTM ConOps. Addressing each subpart/ section of the relevant annexes, it suggests how UK Regulation (EU) 2017/373 could apply or be changed for both UTMSPs and UDSPs (as proposed in the previous chapter). Most of the consultation questions can be found in this chapter, asking for industry's opinions on the CAA's proposals. Each section begins with a high-level summary of the relevant annex/subpart of the annex which is intended as a general overview of the legal framework provided for context only to assist understanding of the CAA's proposals. The summaries do not constitute legal advice, nor should they be taken as an authoritative interpretation of applicable law or regulation.

UK Regulation (EU) 2017/373 - Annex III Part ATM/ANS.OR

Subpart A – General Requirements

Context

3.1 This subpart covers compliance processes for findings, safety directives, occurrence reporting, contingency planning, transparency, aeronautical data provision, and data quality management. ATM/ANS providers must demonstrate robust data governance and open service provision.

3.2 It requires ATM/ANS providers to apply for a service provider certificate (or a limited certificate where applicable) in the form and manner prescribed by the competent authority and specifies that certificates and any declarations remain valid only while the provider continues to comply with applicable requirements and has not surrendered or had its certificate revoked.

3.3 It requires that ATM/ANS providers supply all information and documentation necessary to demonstrate compliance at the time of application, and to notify the competent authority of proposed changes that may affect the certificate scope or the safe provision of services.

3.4 It requires ATM/ANS providers to coordinate with other providers and stakeholders where proposed changes will affect other services, to submit proposed alternative

Means of Compliance for approval where such alternatives are to be used, and to allow the competent authority to carry out inspections, audits and oversight activities in accordance with the Regulation.

Proposals for UTMSPs

3.5 We consider all elements of Subpart A, relating to general requirements, to be necessary, applicable and proportionate requirements for UTM service provision, depending on services provided, as shown in Table 4. It is proposed these remain unchanged for the UK concept of UTMSPs. The only proposed general amendment, found for A.020, relates to an issue in wording.

3.6 We consider all elements of Subpart A, relating to change management, to be necessary, applicable and proportionate requirements for UTM service provision. It is proposed these remain unchanged for the UK concept of UTMSPs.

Table 4: Annex III Part ATM/ANS.OR Subpart A UTM Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
A.001[16] Scope	Applicable	Applicable	Applicable
A.005 Application for a service provider certificate	Applicable	Applicable	Applicable
A.010 Application for a limited certificate	Applicable (through Options (a) and (b))	Applicable (through Options (a) and (b))	Applicable (through Options (a) and (b))
A.015 Declaration by flight information service providers	Not Applicable	Not Applicable	Not Applicable
A.020 Means of compliance	Amend	Amend	Amend
A.025 Continued validity of a certificate	Applicable	Applicable	Applicable
A.030	Not Applicable	Not Applicable	Not Applicable

[16] All organisations wishing to provide an ATS or one of the UTM mandatory services are in scope for this requirement

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
Continued validity of a declaration of a flight information services provider			
A.035 Demonstration of compliance	Applicable	Applicable	Applicable
A.040 Changes – general	Applicable	Applicable	Applicable
A.045 Changes to a functional system	Applicable	Applicable	Applicable
A.050 Facilitation and cooperation	Applicable	Applicable	Applicable
A.055 Findings and corrective actions	Applicable	Applicable	Applicable
A.060 Immediate reaction to a safety problem	Applicable	Applicable	Applicable
A.065 Occurrence reporting	Applicable	Applicable	Applicable
A.070 Contingency plans	Applicable	Applicable	Applicable
A.075 Open and transparent provision of services	Applicable	Applicable	Applicable
A.080 Provision of aeronautical data	Applicable	Applicable	Applicable
A.085 Aeronautical data quality management	Applicable	Applicable	Applicable
A.090 Common reference systems for air navigation	Applicable	Applicable	Applicable

Rationale for UTMSPs

3.7 Subpart A addresses the general requirements applicable to any ATM/ANS provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities when providing UTM services. The CAA considers that they should therefore be applied to UTMSPs.

Proposals for UDSPs

3.8 We consider all elements of Subpart A, relating to general requirements, to be necessary, applicable and proportionate requirements for unmanned aircraft services data provision. It is proposed these remain unchanged for the UK concept of UDSPs.

3.9 We consider all elements of Subpart A, relating to change management, to be necessary, applicable and proportionate requirements for unmanned aircraft services data provision. It is proposed these remain unchanged for the UK concept of UDSPs.

Rationale for UDSPs

3.10 Subpart A addresses the general requirements applicable to any ATM/ANS provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities when providing unmanned aircraft services data provision. The CAA considers that they should therefore be applied to UDSPs.

Subpart B - Management

Context

3.11 This subpart requires a documented management system with clear accountability, safety and quality policies, compliance monitoring, change identification, training, communication, and formal interfaces with other ATM/ANS providers. The system must be proportionate to service provider size and the complexity of its activities.

3.12 This includes requiring ATM/ANS providers to designate an accountable manager with authority for resources and for ensuring compliance, to define and document an organisational structure allocating responsibilities and accountabilities (including safety and quality roles), to maintain adequate premises and facilities, and to keep records and operations manuals.

3.13 It requires that records be retained for specified periods sufficient to demonstrate compliance, that operations manuals be available to relevant personnel and kept up to date, and that ATM/ANS SPs operate an occurrence-reporting system and a process for identifying, correcting and preventing recurrence of non-conformities, including implementation of corrective action plans subject to oversight. Providers

must submit procedures and any modifications for competent authority approval before use. Deviations from approved procedures must be formally requested and justified.

3.14 A service provider should:

a) Determine the necessary competence for personnel performing activities supporting services provision;

b) Where applicable, provide training or take other actions to achieve the necessary competence;

c) Evaluate the effectiveness of the actions taken;

d) Ensure that personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the objectives; and

e) Maintain appropriate records of education, training, skills and experience.

Proposals for UTMSPs

3.15 We propose that all of Subpart B, relating to general requirements, to be necessary, applicable, and proportionate to UTM service provision, as shown in Table 5.

3.16 We propose that all elements of Subpart B, relating to change management, to be necessary, applicable and proportionate requirements for UTM service provision.

Table 5: Annex III Part ATM/ANS.OR Subpart B Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
B.001 Technical and operational competence and capability	Applicable	Applicable	Applicable
B.005 Management system	Applicable	Applicable	Applicable
B.010 Change management procedure	Applicable	Applicable	Applicable
B.015 Contracted activities	Applicable	Applicable	Applicable
B.020 Personnel requirements	Applicable	Applicable	Applicable
B.025 Facilities requirements	Applicable	Applicable	Applicable

Rationale for UTMSPs

3.17 Subpart B addresses the organisation's management requirements applicable to any ATM/ANS provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities when providing UTM services. This entails that they should be applied to UTMSPs.

Proposals for UDSPs

3.18 We consider all of Subpart B, relating to general requirements, to be necessary, applicable, and proportionate to unmanned aircraft systems data service provision. It is proposed these will remain unchanged for the UK concept of UDSPs.

3.19 We deem all elements of Subpart B, relating to change management, to be necessary, applicable and proportionate requirements for unmanned aircraft

systems data service provision. It is proposed these will remain unchanged for the UK concept of UDSPs.

Rationale for UDSPs

3.20 Subpart B addresses the management requirements applicable to any ATM/ANS provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities when providing unmanned aircraft systems data service. The CAA therefore considers that they should be applied to UDSPs.

Subpart C – Specific Requirements – Non-ATS

Context

3.21 This subpart requires providers that do not provide air traffic services (ATS), for example MET, aeronautical information services (AIS), data services (DAT), CNS providers, to perform a safety-support assessment when they plan changes to functional systems, and to produce and retain a documented safety argument and supporting evidence demonstrating that the changed system will meet applicable requirements

3.22 It specifies that the safety-support assessment shall address the scope of the change, interfaces, system lifecycle, degraded modes, verification and validation, and monitoring criteria that will be used to ensure continued compliance in operational service.

Proposals for UTMSPs

3.23 We propose to not apply the elements in this subpart to UTM service provision.

Table 6: Annex III Part ATM/ANS.OR Subpart C Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
C.001 Scope	Not Applicable	Not Applicable	Not Applicable
C.005 Safety support assessment and assurance of changes to the functional system	Not Applicable	Not Applicable	Not Applicable

Rationale for UTMSPs

3.24 Our rationale for this proposal is that this subpart addresses the specific organisational requirements applicable for service providers other than ATM/ANS.

However, the requirements for UTMSPs are covered in Annex IV Part ATS, and so the CAAA considers this subpart is not relevant for UTMSPs.

Proposals for UDSPs

3.25 We consider all elements of Subpart C to be necessary, applicable and proportionate requirements for UDSPs, as they will be tasked with carrying out a Safety Support Assessment.

Rationale for UDSPs

3.26 Our rationale for our proposal is that we do not consider that Annex IV Part ATS should to apply for UDSPs, and so we consider this subpart relevant and appropriate to be applied to UDSPs.

Subpart D – Specific Organisational Requirements for ANS and ATFM Providers and the Network Manager

Context

3.27 This subpart includes business and annual planning, financial strength, liability, insurance, as well as additional physical and cyber security management requirements.

3.28 It requires ANSPs to prepare documented business planning and performance arrangements, including multi-year business plans and annual plans (covering safety, capacity, environment and cost-efficiency where applicable), and to maintain evidence of planning, resource allocation and performance monitoring consistent with the Regulation’s requirements.

3.29 ANSPs are required to establish a security management system to prevent unlawful interference with service provision and to restrict access to private data. This system shall define the procedures relating to:

a) security risk assessment and mitigation

b) security monitoring

c) security breach detection and alerting

d) security breach mitigation and recovery

e) protecting systems and data against information and cyber security threats.

3.30 ANSPs should be able to meet their financial obligations, using an appropriate cost-accounting system as demonstrated in their annual plan. They must undergo regular independent financial audits and have in place liability and insurance cover arrangements that are relevant to their activities.

Proposals for UTMSPs

3.31 We deem all elements of Subpart D to be necessary, applicable and proportionate requirements for UTMSPs, as shown in Table 7. This subpart applies only to ANS and ATFM providers and the Network Manager.

3.32 We propose amending OR.D.005 (b)(2()(ii) to widen its applicability to all ANSPs and UTMSPs.

Table 7: Annex III Part ATM/ANS.OR Subpart D Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
D.001 Scope	Applicable	Applicable	Applicable
D.005 Business, annual, and performance plans[17]	Applicable	Applicable	Applicable
D.010 Security management	Applicable	Applicable	Applicable
D.015 Financial strength – economic and financial capacity	Applicable	Applicable	Applicable
D.020 Liability and insurance cover	Applicable	Applicable	Applicable
D.025 Reporting requirements	Applicable	Applicable	Applicable

Rationale for UTMSPs

3.33 Subpart D addresses the specific organisational requirements applicable to any ATM/ANS or ATFM provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities to adequately ensure the provision of business planning, security and liability insurance. The CAA considers that they should therefore be applied to UTMSPs.

[17] This element is only applicable to UTMSPs applying for a full certificate

Proposals for UDSPs

3.34 We consider all elements of Subpart D to be necessary, applicable and proportionate requirements for UDSPs. This subpart applies only to ANS and ATFM providers and the Network Manager.

Rationale for UDSPs

3.35 Subpart D addresses the specific organisational requirements applicable to any ATM/ANS or ATFM provider, as they are reasonable and essential requirements of any organisation involved in flight safety or safety critical activities to adequately ensure the provision of business planning, security and liability insurance. The CAA considers that they should therefore be applied to UDSPs.

UK Regulation (EU) 2017/373 - Annex IV Part ATS

Subpart A – Section 1 – General Requirements

Context

3.36 This subpart establishes governance and transparency obligations for Air Traffic Service (ATS) Providers. It requires disclosure of legal status, ownership structure, and significant business links, alongside measures to prevent conflicts of interest and anti-competitive behaviour. Coordination with aerodrome operators and aeronautical information services is emphasised to ensure seamless data exchange and operational alignment.

3.37 It requires ATS providers to notify competent authorities of legal details and links with third-party organisations, to prevent conflicts of interest.

3.38 It sets out the processes that ATS providers must have when providing aeronautical information to other Aeronautical Information Services Providers (AISPs), including considerations to take note of when introducing changes to the systems for air navigation under its responsibility, and abiding by internationally agreed aeronautical information regulation and control (AIRAC).

Proposals for UTMSPs

3.39 We consider all elements of Subpart A – Section 1 to be necessary, applicable and proportionate requirements for UTMSPs, as shown in Table 8. It is proposed these remain unchanged for the UK concept of UTMSPs.

3.40 We propose that ATS.OR.105 should be an additional requirement to Annex III Part ATM/ANS.OR for UTMSPs.

3.41 We propose that ATS.OR.110 should only be applicable if a UTMSP is providing ATS at an aerodrome or a ‘traditional’ ANSP is providing, in addition to ATS, UTM service provision to UAS at an aerodrome.

3.42 We propose that ATS.OR.125 should only be applicable if the UTMSP has information in the Aeronautical Information Publication (AIP).

3.43 We propose creating an additional requirement to ensure UTMSPs demonstrate that they have a DSS function to allow UTMSPs to develop a 'working together' capability.

Table 8: Annex IV Part ATS Subpart A Section 1 Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
OR.100 Ownership	Applicable	Applicable	Applicable
OR.105 Open and transparent provision of service	Applicable	Applicable	Applicable
OR.110 Coordination between aerodrome operators and air traffic services providers	Applicable (see 3.42)	Applicable (see 3.42)	Applicable (see 3.42)
OR.125 Coordination between aeronautical information services and air traffic services providers	Applicable	Applicable	Applicable

Rationale for UTMSPs

3.44 Our rationale for this proposal is to ensure that the provision of UTM conflict management services meet the same requirements as existing ATS provision. That this is a reasonable and essential expectation of any organisation involved in flight safety or safety-critical activities of providing ATS's.

3.45 Our rationale for our proposal in 3.40 is that this requirement is applicable and appropriate to all UTM services and not just the UTM conflict management services. As such we propose that for UTM service provision this requirement be included in Annex III.

3.46 We consider our proposal in 3.41 is a proportionate requirement that will only be applied where a UTMSP (predominately type A2) is providing services at an aerodrome and would not, therefore, apply to all UTMSP's

3.47 Our rationale for our proposal in 3.42 is that UTMSP's, like ATS providers would need to share pertinent information to the relevant aeronautical information services provider, the aeronautical information to be published as necessary to permit the utilisation of such UTM services. The application of ATS.OR.125 would be predominantly applicable to type A2 providers, as proposed in this consultation, some elements of ATS.OR.125 are applicable to type A1 providers.

3.48 Our rationale for creating a new requirement, as stated in 3.43, is that this will address the vital necessity for multiple UTMSPs and ANSPs to digitally discover and synchronise with each other and exchange appropriate information and data to address the MAC risk between UAS.

Proposal for UDSPs

3.49 We consider that this annex does not apply for UDSPs.

Rationale for UDSPs

3.50 This is because UDSPs, as proposed do not provide ATS (Air Traffic Services) and so we consider this annex would not be relevant for them.

Subpart A – Section 2 – Additional Organisational Requirements for Providers of ATS – Safety of Services

Context

3.51 This subpart focuses on the implementation of a safety management system (SMS) integrated with the ATS provider’s management system. It requires a documented safety policy, risk management processes, assurance mechanisms, and safety promotion activities.

3.52 ATS providers must demonstrate hazard identification, risk analysis, and mitigation strategies. Safety criteria must be explicit, justified, and verifiable, ensuring that changes do not introduce unacceptable risks and support continuous safety improvement. Training and communication programs are also required to ensure personnel competence and awareness of safety responsibilities.

3.53 ATS providers must also ensure that air traffic controllers are properly licensed and hold a valid medical certificate, as stated in UK Regulation (EU) 2015/340.

Proposals for UTMSPs

3.54 As shown in Table 9, we consider most elements of Subpart A – Section 2 to be necessary, applicable and proportionate requirements for type A1 UTMSPs. We

also consider all elements to be necessary, applicable and proportionate requirements for type A2 UTMSPs. It is proposed these will remain unchanged for the UK concept of UTMSPs.

3.55 In relation to UTMSPs, we propose that OR.215 of this annex only applies to type A2 UTMSPs.

Table 9: Annex IV Part ATS Subpart A Section 2 Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
OR.200 Safety management system[18]	Applicable	Applicable	Applicable
OR.205 Safety assessment and assurance of changes to the functional system	Applicable	Applicable	Applicable
OR.210 Safety criteria	Applicable	Applicable	Applicable
OR.215 Licensing and medical certification requirements for air traffic controllers	Applicable (Only for Type A2 UTMSPs)	Applicable (Only for Type A2 UTMSPs)	Applicable (Only for Type A2 UTMSPs)

Rationale for UTMSPs

3.56 Our rationale for our proposal is that we consider that the conflict management services provided by UTMSPs should be aligned with the existing ATS, and so we consider this is a reasonable and essential expectation of any organisation involved in flight safety or safety-critical activities as a requirement of ATS provision.

3.57 Our rationale for our proposal in 3.56 is that type A1 providers would not be utilising ATCOs or FISOs to provide services, and so ATS.OR.215 would not be relevant for them. An amendment may be required to acknowledge this.

[18] Proportionality is addressed through the ability for an application to be made under the limited certificate application identified in Annex III Part ATM/ANS.OR.A.010 Application for a limited certificate

Proposal for UDSPs

3.58 We propose that this annex does not apply for UDSPs.

Rationale for UDSPs

3.59 This is because UDSPs, as proposed, would not provide ATS (Air Traffic Services) and so we consider this annex would not be relevant for them.

Subpart A – Section 3 – Specific Human Factors Requirements for Air Traffic Control Service providers

Context

3.60 This subpart addresses human factors affecting ATCO personnel. It mandates policies to detect and prevent problematic use of psychoactive substances, manage stress and fatigue, and implement rostering systems that balance duty and rest periods.

3.61 It mandates developing policies for the management of air traffic controllers' stress and fatigue, complemented by education programs on the prevention of stress and fatigue, including during critical incidents.

Proposals for UTMSPs

3.62 We consider all elements of Subpart A – Section 3 to be necessary, applicable and proportionate requirements only for the proposed type A2 UTMSPs, using ATCOs to provide ATS, as part of UTM service provision, as shown in Table 10. It is proposed these will remain unchanged for the UK concept of UTMSPs.

3.63 We also propose the following alternative options:

a) Applying all elements of this section to FISOs providing FIS. This would require amendment of elements of OR.305 and OR.320, to reflect the role of FISOs.

b) Amending the applicability of Subpart A – Section 3 to address the human factors or humans undertaking a safety role in service provision. This entails reviewing the applicability of requirements to be applicable to both type A1 and type A2 providers. We propose that any roles that exercise a safety function in support of service provision should be addressed under this section.

Table 10: Annex IV Part ATS Subpart A Section 3 Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
OR.300 Scope	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)
OR.305 Responsibilities of air traffic control service providers with regard to the problematic use of psychoactive substances by air traffic controllers	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)
OR.310 Stress	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)
OR.315 Fatigue	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)
OR.320 Air traffic controllers' rostering system(s)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)	Applicable (Only to type A2 UTMSPs)

Rationale for UTMSPs

3.64 This section addresses the specific human factors required for Air Traffic Control Service providers using an ATCO to provide an ATC service. Given that these requirements are applied to existing ANSPs providing ATS using ATCOs, we consider these can proportionately be applied to type A2 UTMSPs.

3.65 Our rationale for our proposal in 3.63 is that while the wider subpart is only applicable to ATCOs, these elements could and should also be applied to FISOs, if the role in question is considered to be exercising a safety function in support of the service provision. The possibility for this needs to be facilitated within the regulation.

3.66 Our rationale for our proposal in 3.64 is that this regulation should not just be contained to ATCOs and FISOs. For example, the proposal for type A1 UTMSPs describe the involvement of a HoVL, which fits outside the classifications of ATCOs or FISOs, but may still require regulatory licensing.

Proposal for UDSPs

3.67 We identified that this annex does not apply for UDSPs.

Rationale for UDSPs

3.68 This is because UDSPs, as proposed, would not provide ATS (Air Traffic Services) and so we consider this annex would not be relevant for them.

Subpart B – Section 1 – Technical Requirements

Context

3.69 This subpart sets technical compliance obligations for ATS providers, requiring alignment of working methods and operating procedures, with technical requirements based on ICAO annexes applied proportionately and UK Implementing Rules. It includes adherence to communication protocols, air traffic service standards, and coordination requirements for flight testing.

3.70 Under ATM, ATS providers must be able to demonstrate the compliance of their working methods with the following pieces of regulation, as far as they relate to the provision of air traffic services in UK airspace.

a) UK (EU) Regulation 923/2012

b) Chicago Convention - Annex 10 on aeronautical telecommunications, Volume II on communication procedures including those with PANS Status in its 6th edition of October 2001, including all amendments up to and including No 89.

c) Chicago Convention - Annex 11 on air traffic services in its 13th edition of July 2001, including all amendments up to and including No 49.

The CAA possesses the ability to specify further conditions, requirements and procedures for air traffic services units providing services for flight testing.

Proposals for UTMSPs

3.71 We deem Subpart B – Section 1 to be necessary, applicable and proportionate requirements for UTM service provision. It is proposed these will remain unchanged for the UK concept of UTMSPs.

Rationale for UTMSPs

3.72 Our rationale for our proposal is that the technical requirements mandated in this section are based on requirements previously identified as applicable to the extent indicated in Subpart A of this annex. This entails that these technical requirements should also apply.

Proposal for UDSPs

3.73 We identified that this annex does not apply for UDSPs.

Rationale for UDSPs

3.74 This is because UDSPs, as proposed, would not provide ATS (Air Traffic Services) and so we consider this annex would not be relevant for them.

UK Regulation (EU) 2017/373 - Annex V Part MET

Context

3.75 This annex[19] establishes the full scope of responsibilities for meteorological service providers (MET providers) designated by a contracting state to support international air navigation. It requires all MET providers to deliver accurate, timely, and operationally relevant meteorological information to aviation stakeholders, including other MET providers, and to maintain formalised agreements governing these exchanges. MET providers must also retain all related meteorological records for a minimum of 30 days to support traceability and post event review.

3.76 It mandates that regional MET providers disseminate meteorological bulletins to all relevant users through fixed telecommunications systems or internet-based channels. It also places significant emphasis on safety-critical reporting: MET providers must issue immediate discrepancy notifications to the world area forecast centre (WAFC) when encountering meteorological phenomena that may adversely affect aviation operations. These include operational hazards such as icing, turbulence, cumulonimbus clouds, squalls, sandstorms, dust storms, as well as volcanic eruptions or any release of radioactive material into the atmosphere that may pose risks to aircraft operations.

3.77 It details the structure and responsibilities of various specialised meteorological units that form the global aviation meteorology system. These include aeronautical meteorological stations, aerodrome meteorological offices, meteorological watch offices, Volcanic Ash Advisory Centres (VAACs), Tropical Cyclone Advisory Centres (TCACs), and World Area Forecast Centres (WAFCs). Each unit plays a specific role in generating, monitoring, or disseminating information essential for flight safety, such as volcanic ash advisories, cyclone warnings, and global forecast products.

3.78 It also specifies the types of meteorological information that must be made available to flight crews and operational personnel. This includes significant weather warnings, flight briefings, flight documentation packages, climatological summaries,

[19] We have not broken this annex into its general and technical requirements due to the nature of cross-cutting proposals we are making. This subchapter and the proposals cover both subparts of Part MET

and any available information on volcanic ash or radioactive releases relevant to the planned flight. Furthermore, MET providers must ensure that aerodrome control towers, Aerodrome Flight Information Service (AFIS) units, and approach control units receive METARs (Meteorological Aerodrome Reports), TAFs (Terminal Aerodrome Forecasts), SIGMETs (Significant Meteorological Information), AIRMETs (Airmen's Meteorological Information), and any amendments or additional meteorological information agreed upon locally.

3.79 It outlines the requirements placed on aeronautical meteorological stations. These stations must compile and disseminate local routine reports, local special reports, and METARs, while maintaining coordination with ATS providers and AISPs, and meteorological watch offices. They must observe and report on a wide range of meteorological elements essential for safe aircraft operations, including surface wind, visibility, runway visual range, present weather, cloud conditions, air temperature, dew point, atmospheric pressure, and any supplementary information relevant to aerodrome safety.

Proposals for UTMSPs

3.80 We propose to not apply the elements in this part to UTM service provision.

Rationale for UTMSPs

3.81 Our rationale for the proposal is that we consider UTMSPs will be the consumers of MET data sourced from the certified MET providers or UDSPs, and will not be required to become certified Met service providers. This means that we consider requirements related to the creation of MET data are not relevant for UTMSPs and so should not be applied.

3.82 Should a UTMSP wish to provide METARs or other ICAO Annex 3 Meteorological products and services then this part would apply and such UTMSP would need to become a certified Met service provider.

3.83 Existing provisions applicable to MET may need to change and/or new UTM-specific information services providers may be required to meet UTM information and information exchange needs.

Proposals for UDSPs

3.84 We propose applying selected elements of Part MET to UDSPs when they process MET information within UTM/UTM-related services.

Rationale for UDSPs

3.85 Applying selected elements of Part MET to UDSPs aims to ensure that meteorological information used within UTM systems is handled consistently and reliably. If UDSPs increasingly act as intermediaries between MET sources and UTM users, their processing, formatting, or fusion of data could influence the accuracy and usability of that information. We consider that introducing

proportionate Part MET based expectations would help safeguard data integrity, supports interoperability across UTM services, and reduce the risk of misinterpretation, while avoiding unnecessary obligations on UDSPs who are not certified MET service providers.

Prospective Policy Options

3.86 We provide below a list of prospective policy options that may address the issues raised for UTMSPs and UDSPs in UK Regulation (EU) 2017/373 Annex V Part MET:

a) Specifying which aspects of Annex III apply to UTMSPs in relation to meteorological data handling. Whilst a UTMSP is not expected to be certified as a meteorological service provider, provisions within Annex III Part ATM/ANS.OR may apply where the UTMSP provides, processes, or redistributes meteorological information. This may include UTMSPs establishing formal arrangements covering contracted meteorological data related activities, including supplemental data acquisition from non-authoritative sources, data transformation, and contingency arrangements. Such agreements would align with relevant Part ATM/ANS.OR obligations regarding quality management, service continuity, and performance oversight. This option would only impact UTMSPs.

b) Maintaining the scope of Part MET while strengthening requirements around machine-to-machine access (API-first), providing finer spatial/vertical resolution and products tailored to low-level urban operations and micro-climates. This option would impact both UTMSPs and UDSPs.

c) Reviewing Part MET to ensure that meteorological services relevant to UTM are fully and appropriately captured within Part-MET. The review would consider roles, responsibilities, and service expectations for providers delivering MET information into UTM systems, including both authoritative and non-authoritative information sources. Recommendations would be incorporated into updated regulatory or guidance material, ensuring clear accountability and consistent performance expectations across the ecosystem. This option would impact both UTMSPs and UDSPs.

d) Clarifying and updating product frequency and amendment thresholds applicable to UTM meteorological information, ensuring consistency with existing UK MET arrangements where appropriate. This option would impact both UTMSPs and UDSPs.

e) Ensuring that UTMSPs and other stakeholders may request new or modified meteorological product types through established channels with the MET Authority. These requests would be evaluated based on operational relevance, data availability, and system impact. Updated frequency and amendment criteria

would be incorporated into the national MET governance framework and made publicly available to UTM stakeholders. This option would only impact UTMSPs.

f) Amending MET.TR.215 of UK Regulation (EU) 2017/373 to specify that all UTMSPs and operators are provided with, and make operational use of, ICAO Space Weather Advisories. This option would impact both UTMSPs and UDSPs.

g) Formalising the use of non-authoritative meteorological sources under documented reliability/validation criteria, pending authoritative availability. Assurance expectations should be published for intermediaries. This would include the need for formal arrangements between UTMSPs, UDSPs and meteorological information sources. This option would impact both UTMSPs and UDSPs.

h) Where on-site automated meteorological equipment is deployed without the intention of producing METAR, SPECIs (Special Meteorological Reports), or local formal aviation reports—UTMSPs should adhere to defined requirements concerning:

(1) Siting and location criteria, including environmental representativeness and avoidance of local interference.

(2) Measurement accuracy specifications, aligned with UTM operational needs and referenced standards.

(3) Maintenance and calibration regimes, including evidence records, schedules, and tolerances.

(4) Fault notification and service continuity arrangements.

The MET Authority should publish technical standards and guidance for equipment types, associated accuracy, and calibration intervals applicable to UTM use cases. This option would only impact UTMSPs.

i) Applying selected elements of Part MET to UDSPs when they process MET information within UTM/UTM related services. This option would only impact UDSPs.

3.87 Our preference would be to implement all the proposed policy options outlined above.

Rationale for Policy Options

3.88 Our rationale for our proposal in 3.86 is that specifying which elements of Annex III apply to UTMSPs aims to ensure that organisations handling meteorological data within the UTM ecosystem would meet appropriate standards without being required to become certified MET service providers. Applying relevant Part ATM/ANS.OR provisions where UTMSPs process, redistribute, or augment MET information helps safeguard data quality, continuity, and oversight. We consider that

requiring formal arrangements for contracted MET related activities—such as supplemental data acquisition, data transformation, or contingency procedures—creates accountability and alignment with established aviation governance practices.

3.89 Our rationale for our proposal in 3.86b) aims to ensure that Part MET continues to provide authoritative meteorological information while evolving to meet the requirements of low-level, high-density, and urban UTM operations.

3.90 Our rationale for our proposal in 3.86c) aims to ensure that the regulatory framework governing meteorological services appropriately reflects the needs and characteristics of UTM operations.

3.91 Our rationale for our proposal in 3.86d) aims to ensure meteorological products supporting UTM reflect operational needs and align with current UK aviation practice, through defining appropriate update and amendment criteria.

3.92 Our rationale for our proposal in 3.86e) is that we consider allowing UTMSPs and other stakeholders to request new or modified MET products would enable meteorological services to stay aligned with evolving UTM operational needs. Evaluating requests against operational relevance, data availability, and system impact would create a transparent, evidence-based process that prioritises feasible and high-value improvements.

3.93 Our rationale for our proposal in 3.86f) is that unmanned aircraft operations rely on GNSS and digital communications, both of which are vulnerable to disruption from space weather events. Ensuring UTMSPs receive these advisories is intended to strengthen situational awareness, support proactive mitigation of navigation or communication degradation, and align unmanned aviation with established aviation safety practices.

3.94 Our rationale for our proposal in 3.86g) aims to ensure that any supplemental MET information used within UTM environment is appropriately validated until authoritative sources are available.

3.95 Our rationale for our proposal in 3.86h) is to establish proportionate requirements for UTMSPs that deploy automated meteorological equipment for UTM operational use, ensuring that the weather data they collect is reliable, representative, and maintained to a consistent standard. Although these sensors are not used to produce formal aviation reports such as METARs or SPECIs, minimum expectations for siting, measurement accuracy, maintenance, calibration, and fault reporting are needed to support safe and effective UTM decision-making. We consider that requiring the MET Authority to publish technical standards and guidance would enable it to, provide a consistent national framework without imposing unnecessary regulatory burden, and the impact would be limited solely to UTMSPs that choose to install their own meteorological equipment.

3.96 Our rationale for our proposal in 3.86i) is that applying selected elements of Part MET to UDSPs aims to ensure that meteorological information used within UTM systems is handled consistently and reliably, even when processed by non-MET service providers. If UDSPs increasingly act as intermediaries between MET sources and UTM users, their processing, formatting, or fusion of data can influence the accuracy and usability of that information. We consider that introducing proportionate Part-MET-based expectations helps safeguard data integrity, supports interoperability across UTM services, and reduces the risk of misinterpretation, while avoiding unnecessary obligations on UDSPs which are not certified MET service providers.

Question 2: *Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex V Part MET, from the list provided in 3.87? Please explain your answer alongside any other thoughts or recommendations you may have.*

Question 3: *Are there any of the proposed policy options for MET that you do not support? Please explain why.*

UK Regulation (EU) 2017/373 - Annex VI Part AIS

Context

3.97 This annex[20] sets out the responsibilities of AISPs in ensuring the integrity, reliability, and timely availability of aeronautical data across the ATM system. AISPs are required to establish procedures that guarantee the effective collection, storage, processing, exchange, and publication of aeronautical information. All data provided must support the safety, regularity, and efficiency of air navigation and must be available to all relevant stakeholders, including flight personnel, ATS providers, and other AISPs. To support operational continuity, AISPs must maintain 24-hour services for the origination and issuance of Notice to Airmen (NOTAMs) as well as the provision of pre-flight information. They must also ensure that any safety risks arising from errors in aeronautical information are monitored and mitigated, and that all aeronautical data originating from the United Kingdom clearly reflects its UK jurisdiction.

3.98 It describes additional requirements related to data quality management. AISPs must implement processes that maintain accuracy, resolution, and integrity throughout the entire data lifecycle, applying quality requirements consistently before any information is released to users. Automation is required for the processing of large volumes of digital aeronautical data, supported by verification methods such as validation techniques, error-detection processes, data

[20] We have not broken this annex into its subparts due to the nature of cross-cutting proposals we are making. This subchapter and the proposals cover all three subparts of Part AIS

transmission authorisation, and mechanisms for error reporting and corrective action. AISPs must also establish formal, documented arrangements with data originators and other stakeholders. These arrangements must allocate responsibilities for data provision, verification, and correction, ensure that quality requirements are upheld across organisational boundaries, and maintain data in globally interoperable formats. Metadata must also be collected and preserved to ensure traceability.

3.99 It outlines the aeronautical data AISPs must provide, including metadata, terrain and obstacle data, aerodrome mapping data, and instrument flight procedure data. Procedures must be in place to ensure consistency between information held or issued in different formats. AISPs are also responsible for publishing an up-to-date, amended permanently at regular intervals or supplemented temporarily where necessary. They must additionally issue NOTAMs and Aeronautical Information Circulars (AICs) to communicate technical, legislative, safety-related, or administrative information essential for the aviation community.

Proposals for UTMSPs

3.100 We propose to not apply the elements in this part to UTM service provision.

3.101 The State-provided AIS will remain the authoritative source for aeronautical information in the UK. UTM stakeholders may access and consume AIS data directly from AIS or via intermediaries (e.g. UDSPs).

Rationale for UTMSPs

3.102 Our rationale for this proposal is that UTMSPs, as proposed in this consultation, will be the consumers of aeronautical information provided by UK AIS, and will not become certified AIS service providers.

3.103 However, existing provisions applicable to AIS may need to change and/or new UTM-specific information services providers may be required to meet UTM information and information exchange needs.

Proposals for UDSPs

3.104 We propose to not apply the elements in this part to UDSPs.

Rationale for UDSPs

3.105 Our rationale for this proposal is that UDSPs, as proposed in this consultation, will be the consumers of aeronautical information made available by UK AIS, and will not become certified AIS service providers.

3.106 However, existing provisions applicable to AIS may need to change and/or new UTM-specific information services providers may be required to meet UTM information and information exchange needs.

Prospective Policy Options

3.107 We provide below a list of prospective policy options that may address the issues raised for UTMSPs and UDSPs in UK Regulation (EU) 2017/373 Annex VI Part AIS:

a) Targeted enhancements to the AIS data catalogue as needed for UTM, including new layers, higher refresh rates, expanded spatial/vertical coverage. This option would impact both UTMSPs and UDSPs;

b) Extend the AIS mandate to enable machine to machine communication (API-first) and a central access point to aeronautical information. This option would impact both UTMSPs and UDSP;.

c) Recognising/ enabling UDSPs as intermediaries to process and provide aeronautical information with appropriate assurance mechanisms. This option would only impact UDSPs;

d) UTM-specific digital NOTAM specifications and workflows (e.g. temporary UAS corridors, geo-fences, launch/recovery site, tactical constraints) are established and UTM events that are safety-relevant to all airspace users are defined. This option would impact both UTMSPs and UDSPs.

Rationale for Policy Options

3.108 Our rationale for our proposal in 3.107a) is intended to ensure appropriate data is available for UTM as the current scope of AIS products do not include all data required by UTMSPs and/or UAS Operators. In some cases, the data may be provided but not in the required format or to the required level of assurance, this proposal attempts to rectify and deficiencies in data and assurance.

3.109 Our rationale for our proposal in 3.107b) is that it is expected that the automated aspect of UTM will require that AIS data is provided in a more digital, machine-readable format than is currently the case.

3.110 Our rationale for our proposal in 3.107c) is that it is expected that UTMSPs and/or UAS Operators may wish to obtain aeronautical information from a third party who provides a product specific to their needs (and who potentially also provides other types of data), rather than needing to obtain it directly from the AIS.

3.111 Our rationale for our proposal in 3.107d) is that it is expected that UTMSPs and UAS Operators may require information by NOTAM that is not in the current scope of digital NOTAM scenarios. In addition, it is expected that increased integration between UAS and manned aviation may require different or additional NOTAMs about UAS activity than those published currently.

Question 4: *Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex VI Part AIS, from the list provided in 3.108? Please explain your answer alongside any other thoughts or recommendations you may have.*

Question 5: *Are there any of the proposed policy options for AIS that you do not support? Please explain why.*

UK Regulation (EU) 2017/373 - Annex VII Part DAT

Context

3.112 This annex[21] sets out the organisational framework that must be established by DAT providers, including the allocation of responsibilities, establishment of documented procedures, management of data origin, and validation and verification arrangements. It lays out the responsibilities of the DAT provider, namely: performing functions on the aeronautical data and information that is released by aeronautical data source provider(s) into aeronautical databases, and issuing statements of conformity between its databases and regulation/ applicable industry standards.

3.113 DAT providers are defined as being an organisation, which is:

a) Type 1 DAT provider that processes aeronautical data for use on aircraft and provides an aeronautical database meeting the DQRs, under controlled conditions, for which no corresponding airborne application/equipment compatibility has been determined.

b) Type 2 DAT provider that processes aeronautical data and provides an aeronautical database for use on certified aircraft application/equipment meeting the DQRs for which compatibility with that application/equipment has been determined.

3.114 It requires the DAT provider to maintain a management system that included control procedures for a variety of compliance and data handling measures. They should include these in its record-keeping system.

3.115 It summarises reporting requirements for DAT providers in reporting instances of deficiencies/ errors in its databases, to customers, competent authorities, other DAT providers and aeronautical data source providers. The DAT provider must maintain an internal reporting system to enable collection and evaluation of these error reports as part of a wider plan to tackle these deficiencies and ensure more reliable aeronautical databases. This system can be integrated into the ATMSP management system as required in ATM/ANS.OR.B.005.

3.116 It contains the technical and procedural framework for the provision of data services, including the establishment of working methods and operating procedures, requirements for data quality, compatibility with intended avionics and aircraft

[21] We have not broken this annex into its subparts due to the nature of cross-cutting proposals we are making. This subchapter and the proposals cover both subparts of Part DAT.

applications, configuration and version control of data sets, validation and testing arrangements, continuity of service provisions, and the handling, correction and reporting of data errors and system deficiencies.

Proposal for UTMSPs

3.117 We propose to not apply the elements in this part to UTM service provision.

Rationale for UTMSPs

3.118 Our rationale for the proposal is that UTMSPs, as proposed in this consultation, will be the consumers of aeronautical information sourced from certified DAT service providers, AIS service providers or UDSPs, and will not be required to become certified DAT service providers.

3.119 Should a UTMSP wish to provide any of the products and services in the scope of the DAT certification then this part would apply and such UTMSP would need to become a certified DAT service provider.

Proposals for UDSPs

3.120 We propose applying some elements of this annex to UDSPs, either transferred into a new UDSP Annex or by adding UDSPs as a new type of DAT provider.

Rationale for UDSPs

3.121 Our rationale for our proposal is that there are entities that are capable of processing and providing data and information into the UTM ecosystem and which do not intend to develop any traffic-management functions (i.e. do not intend to become UTMSPs). These organisations may supply aeronautical, meteorological or other information that is essential for UAS operations and for UTMSPs to deliver their services. However, under the current UK Regulation (EU) 2017/373, there is no certification mechanism that appropriately covers this role.

3.122 Part DAT was designed with a specific and relatively narrow scope, focused on data services supporting conventional ATM and AIS. Its definitions and requirements are linked to manned aviation arrangements, and so we consider the existing DAT Provider category is too specific to be applied directly to these new UTM-oriented data service actors.

3.123 As a result, providers who wish to support UAS operations through provision of information do not currently fall under a suitable regulatory framework, leaving a gap in oversight and assurance. At the same time, UDSPs share material characteristics with traditional DAT providers:

a) They provide data and information rather than traffic management services.

b) They are expected to rely on authoritative sources of information (unlike AIM or MET SPs who are the authoritative sources of information).

c) Their outputs will directly affect the safety and reliability of UTM services.

d) They must ensure the quality (including integrity, timeliness, and traceability) of the information they distribute.

3.124 For these reasons, we consider that Part DAT is the closest conceptual match for UDSPs within the structure of UK Regulation (EU) 2017/373. In our view, its assurance principles, safety expectations and governance model align well with our proposed UDSP function, even though its current scope does not explicitly encompass them.

3.125 Accordingly, we propose applying selected and relevant elements of the existing Part DAT annex to UDSPs. This could be achieved either by transferring adapted requirements into a new UDSP-specific annex, or by adding UDSPs as a new class of DAT Provider, with tailored applicability to ensure the requirements remain proportionate and fit for purpose. We consider that either approach would establish an appropriate certification and oversight route for UDSPs without introducing unnecessary complexity or duplicating regulatory frameworks elsewhere in 2017/373.

3.126 The overarching objective is intended to ensure a proportionate, future-proof regulatory mechanism that supports high-quality data provision into the UTM ecosystem while maintaining consistency with the principles already established in the wider regulatory framework.

Prospective Policy Options

3.127 We provide below a list of prospective policy options that may address the issues raised for UDSPs in UK Regulation (EU) 2017/373 Annex VII Part DAT:

a) Amending UK Regulation (EU) 2017/373 to expressly include UDSPs with proportionate DQR, provenance, traceability and validation obligations for both machine-readable and human-readable services. This can be done through one of the following approaches:

(1) Creating a new Annex under UK Regulation (EU) 2017/373 for UTM Data Service providers (and a dedicated ‘UTM DAT’ certificate), open to currently certificated ANSPs wishing to extend into UTM data services and to new entrants.

(2) Instead of a new Annex, expanding Part-DAT provider types/classes (e.g., additional DAT categories) that explicitly cover UTM data services with tailored obligations, maintaining a single DAT certification framework.

(3) As part of a hybrid or transition approach, introducing an interim recognition route (e.g., declaration and oversight) for UTM data services with a planned migration to either an expanded/new DAT type certificate or a dedicated UDSP certificate by a defined date.

b) Defining interface expectations, for example Aeronautical Information Exchange Model (AIXM), ICAO Meteorological Information Exchange Model (IWXXM), Flight Information Exchange Model (FIXM) and JavaScript Object Notation (JSON) profiles, versioning, latency/availability Service Level Agreements (SLAs) and conformance assessment for automated ingestion by UTMSPs/UAS operators.

c) Similar to DAT providers, UDSPs should be expected to consume/process authoritative AIS/MET/CNS data, with interim origination and validation acceptable only until authoritative sources are available.

Rationale for Policy Options

3.128 Our rationale for suggesting option 3.127a) is that we consider that this option would allow UDSPs to be certified and have a new Annex within which to describe the requirements for them, without amending the definition of a DAT Provider and the requirements in Annex VII. Some requirements from Part-DAT would likely be copied in the new Annex, alongside any new requirements for UDSPs.

3.129 Our rationale for suggesting option 3.127a)(2) is that we consider that this option would allow UDSPs to be certified but not require a new Annex. The definition of a DAT Provider would be required to be updated, and Part-DAT amended to add clarification as to which requirements are applicable to existing DAT Providers, which are applicable to new UDSPs, and which are applicable to both. New requirements for UDSPs are expected to be added to Part-DAT if this option is chosen. Our current preference is Option 3.127a) over this option, as the format of the requirements in Annex VII may make it difficult to insert UTM data requirements and exceptions without compromising clarity.

3.130 Our rationale for suggesting option 3.127a)(3) is that this option would allow UDSPs to be recognised in a shorter time frame, but provide additional time to define the requirements which would be applicable to them, following the responses to consultation questions. However, as noted above our current preference is 3.127a) because this option would mean that UDSPs need to comply with a regulatory process which would only be temporary in nature, and then comply with a new regulatory process at a later date.

3.131 Our rationale for our proposal in 3.127b) is that it is expected that the data needs of UTSMPs and UAS Operators, and the needs for interoperability between UTM and ATM, will not be the same as the data and information exchange mechanisms currently in place. However, we acknowledge that more information is needed through consultation before requirements regarding this data and information exchange can be defined.

3.132 Our rationale for our proposal in 3.127c) is that where UTMSPs and UAS Operators are receiving data and information from UDSPs, we consider that the UDSP should be providing data and information obtained from authoritative sources. It is possible

that not all of the data UDSPs may need is currently available from AIS/MET/CNS providers, and therefore our intention with this proposal would be to formalise the use of non-authoritative aeronautical and meteorological sources with sufficient assurance pending authoritative availability. This would include the need for a formal arrangement between UTMSP, UDSP and non-authoritative sources. Our rationale is intended to ensure that any AIM and MET information used within UTM environment is appropriately validated until authoritative sources are available.

Question 6: *Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex VII Part DAT, from the list provided in 3.128? Please explain your answer alongside any other thoughts or recommendations you may have.*

Question 7: *Are there any of the proposed policy options for DAT that you do not support? Please explain why.*

UK Regulation (EU) 2017/373 - Annex VIII Part CNS

Subpart A – Section 1 – General Requirements

Context

3.133 This subpart mandates that CNS providers must ensure the availability, continuity, and integrity of services and confirm service quality. This should be done by demonstrating regular maintenance and calibration of equipment.

Proposals for UTMSPs

3.134 We consider all elements of Subpart A – Section 1 to be necessary, applicable and proportionate requirements for UTM service provision. It is proposed these will remain unchanged for the UK concept of UTMSPs.

Rationale for UTMSPs

3.135 Subpart A – Section 1 addresses all service providers utilising a CNS capability as a reasonable and essential requirement of any organisation involved in safety or safety-critical activities to address an organisation's engineering management system. Ensuring the availability, continuity, accuracy and integrity of their communication, navigation or surveillance services, as applicable. This entails that they should be applied to UTMSPs.

3.136 We note that the ANO is the primary route in assessing the capability of the CNS equipment and the application of an Article 205 and 206 approval, along with CAP670 containing the relevant GM.

Proposals for UDSPs

3.137 We consider all elements of Subpart A – Section 1 to be necessary, applicable and proportionate requirements for UD service provision. It is proposed these will remain unchanged for the UK concept of UDSPs.

Rationale for UDSPs

3.138 Subpart A – Section 1 addresses all service providers utilising a CNS capability as a reasonable and essential requirement of any organisation involved in safety or safety-critical activities to address an organisation's engineering management system. Ensuring the availability, continuity, accuracy and integrity of their communication, navigation or surveillance services, as applicable. This entails that they should be applied to UDSPs.

3.139 We note that the ANO is the primary route in assessing the capability of the CNS equipment and the application of an Article 205 and 206 approval, along with CAP670 containing the relevant GM.

Subpart B – Section 1 – General Requirements

Context

3.140 This subpart requires CNS providers to comply with Chicago Convention Annex 10 standards for CNS systems. This includes adherence to working methods and operating procedures, covering radio navigation aids, communication procedures, communications systems, surveillance systems, and aeronautical radio frequency spectrum utilisation.

Proposals for UTMSPs

3.141 We propose that this section should be applied where CNSS capabilities used align with the current contents of ICAO Annex 10, for example in relation to:

a) GNSS

b) Communication procedures

c) Digital data communications data links

d) Surveillance radar and collision avoidance systems

e) Aeronautical radio frequency spectrum utilisation

3.142 However, if the capability falls under a generic CNS capability not covered by Annex 10, then we propose that operators must demonstrate the availability, continuity, accuracy, quality and integrity of that capability, and shall demonstrate that their equipment is regularly maintained and, where required, calibrated.

Rationale for UTMSPs

3.143 Our rationale for our proposal is that currently any new equipment, hardware or software that a UTMSP will be required to use, that is not already contained in ICAO Annex 10, will not be able to be approved or audited under Article 205. This hinders the implementation of UTM, and renders it in need of change.

Proposals for UDSPs

3.144 We propose that this section should be applied where CNSS capabilities used align with the current contents of ICAO Annex 10, for example in relation to:

a) GNSS

b) Communication procedures

c) Digital data communications data links

d) Surveillance radar and collision avoidance systems

e) Aeronautical radio frequency spectrum utilisation

3.145 However, if the capability falls under a generic CNS capability not covered by Annex 10, then we propose that operators must demonstrate the availability, continuity, accuracy, quality and integrity of that capability, and shall demonstrate that their equipment is regularly maintained and, where required, calibrated.

Rationale for UDSPs

3.146 Our rationale for our proposal is that currently any new equipment, hardware or software that a UTMSP will be required to use, that is not already contained in ICAO Annex 10, will not be able to be approved or audited under Article 205. This hinders the implementation of UTM, and renders it in need of change.

UK Regulation (EU) 2017/373 - Annex IX Part ATFM

Section 1 – General Requirements

Context

3.147 This section focusses on coordination between ATS units and the central ATFM unit to optimise airspace use and manage traffic demand. ATMSPs must establish processes for data sharing, adherence to departure slots, and contingency planning for critical events, ensuring timely communication with all stakeholders.

3.148 It mandates the 24-hour availability of the ATFM function to relevant parties, with whom there should be consistent procedures established. ATMSPs should ensure that ATFM procedures during critical events are established and published by the central ATFM unit.

3.149 The definition and implementation of ATFM should be compatible with Secretary of State security and defence requirements, and it should provide the central ATFM unit with data in a timely and quality-assured manner.

3.150 It requires ATMSPs to establish a comprehensive safety assessment process, including hazard identification, risk assessment and mitigation, is conducted, before any major changes to ATFM are introduced. Personnel should be made aware of ATFM regulation and adequately competent to execute it.

Proposals for UTMSPs

3.151 We propose to not apply the elements in this subpart to UTM service provision.

Table 11: Annex IX Part ATFM Section 1 Services Breakdown

Element	Flight Authorisation	Strategic Deconfliction
TR.100 Working methods and operating procedures for providers of air traffic flow management	Not Applicable	Not Applicable

Rationale for UTMSPs

3.152 Our rationale for this proposal is that this section largely refers to obligations of member states, which will not apply to individual UTMSPs in the UK that are outside of the additional context.

Proposal for UDSPs

3.153 We identified that this annex does not apply for UDSPs.

Rationale for UDSPs

3.154 This is because UDSPs, as proposed, do not provide ATFM and so we consider this annex would not be relevant for them.

Section 2 – Regulatory Requirements

Context

3.155 This section contains the Regulatory requirements drawn from UK Regulation (EU) No 255/2010 and UK Regulation (EU) No 677/2011 for ATFM provision, including the planning and implementation of traffic flow measures, capacity management, slot or sequence management where applicable, information exchange requirements, performance monitoring, and contingency planning for degraded service or system disruptions.

3.156 It states that ATS units must coordinate ATFM measures with the central unit through local ATFM units and enable pilot/operator information exchange when needed. They must notify the central unit of events impacting ATC (Air Traffic Control) capacity and share operational data such as airspace availability, taxi times, and sector configurations. ATFM slots must be integrated into ATC clearances, and flights must comply with slot times; non-compliant flights or those with rejected plans cannot receive take-off clearance.

3.157 It requires that ATFM measures applied to airports must be coordinated with airport managing body itself, including contingency procedures with operators affected by critical events.

Proposals for UTMSPs

3.158 We deem most elements of Section 2 to be necessary, applicable and proportionate requirements for UTM service provision, as shown in Table 12. However, the requirements will not be based in the two regulations quoted in 3.156 and should be amended to promote proportionality. It is proposed these will remain unchanged for the UK concept of UTMSPs

3.159 We propose amending Articles 6.1, 6.4, and 6.5 to acknowledge that they are only applicable to UTMSPs if the UK is to introduce the function of a CISP.

3.160 We propose amending Article 6.2 to remove any mention of a central ATFM unit.

3.161 We propose to not apply Article 6.6(c) to UTM service provision unless they are operating from an aerodrome with ATS

3.162 We propose extracting Articles 6.2, 6.3, 6.6(a), and 6.6(b), to create distinct general requirements surrounding them for UTMSPs, to enable their application to Strategic Deconfliction.

Table 12: Annex IX Part ATFM Section 2 Services Breakdown

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
Article 6.1 General obligation of ATS units	Not Applicable	Not Applicable	Not Applicable
Article 6.2 General obligation of ATS units	Amend	Amend	Not Applicable

Element	Flight Authorisation	Geo-Consciousness	Conflict Management Services
Article 6.3 General obligation of ATS units	Applicable (Only Type A2 UTMSPs)	Applicable	Not Applicable
Article 6.4 General obligation of ATS units	Amend	Not Applicable	Not Applicable
Article 6.5 General obligation of ATS units	Amend	Not Applicable	Not Applicable
Article 6.6(a) General obligation of ATS units	Applicable	Applicable	Not Applicable
Article 6.6(b) General obligation of ATS units	Applicable	Applicable	Not Applicable
Article 6.6(c) General obligation of ATS units	Not Applicable	Not Applicable	Not Applicable
Article 10.2 (first part) Monitoring of compliance to ATFM measures	Applicable	Applicable	Not Applicable
Article 10.2 (second part) Monitoring of compliance to ATFM measures	Applicable	Applicable	Not Applicable

Rationale for UTMSPs

3.163 Our rationale for our proposal in 3.158 is that the intent of this section is applicable to UTMSPs who intend to use the filing of a flight plan or flight intent to enable the service provider to apply strategic deconfliction.

3.164 We justify our proposals in 3.159 and 3.160 by pointing out that the current regulation reflects the state structure for ATFM established under Section 1. To ensure Section 2 is relevant and proportionate to the needs of UTMSPs and UAS operators applying strategic deconfliction on a federated volume of airspace, amendment will be required:

a) Articles 6.1, 6.4 and 6.5 would only be applicable if the UK were to adopt a concept of a CISP. This needs to be acknowledged within the regulation if applied to UTM since the CAA has not yet made a formal decision on a CISP.

b) Article 6.2 would not apply to UTMSPs as they may operate without a central ATFM unit.

3.165 Our rationale for our proposal in 3.161 is that UAS are not issued with a take-off clearance as they have their own procedures to ensure they confirm to any departure time. Hence, this requirement is not applicable unless the mentioned condition is met.

3.166 Our rationale for our proposal in 3.162 is that redrafting these Articles into specific requirements that are applicable to Flight Authorisation and Strategic Deconfliction services, would aim to ensure they are applicable and proportionate to the provision of UTM services.

Proposal for UDSPs

3.167 We identified that this annex does not apply for UDSPs.

Rationale for UDSPs

3.168 This is because UDSPs, as proposed, would not provide ATFM and so we consider this annex would not be relevant for them.

UK Regulation (EU) 2017/373 - Annex X Part ASM

Section 1 – General Requirements

Context

3.169 This section says that ASM providers must ensure flexible use of airspace through strategic, pre-tactical, and tactical processes. This includes allocating airspace based on user requirements, approving activities requiring reservations, and developing cross-border coordination mechanisms.

3.170 It states that the Secretary of State is responsible for establishing an airspace management cell to allocate airspace in accordance with a range of conditions, with a range of support systems managing airspace allocation and communicating with all relevant stakeholders and operators.

3.171 It establishes the need for real-time activation and deactivation of airspace to be supported by civil-military coordination systems in a timely manner, and for this to be communicated to all affected users. Direct communication will be enabled to resolve traffic situations between them and any cross-border activities must be based upon common procedures between the relevant civil and military units.

3.172 A safety management process is also required before introducing changes to the operations of the flexible use of airspace.

Proposals for UTMSPs

3.173 We are proposing to not apply this annex to UTM service provision. However this, there may be individual elements which we consider should be used as the basis for new general requirements for ASM, as shown in Table 13.

3.174 We propose that from Commission Regulation (EC) 2150/2005, all elements under Article 5, as well as the second part of Article 7, are not to be applied to UTM service provision.

3.175 We propose that Articles 6.1, 6.2, 6.3 and 6.4 require amendment in order to be able to be applied to UTMSPs.

Table 13: Annex X Part ASM Section 1 Services Breakdown

Element	Flight Authorisation	Geo-consciousness
TR.100 Working methods and operating procedures for providers of airspace management	Applicable	Applicable
Article 5.1 [Article 4.1 (a)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (b)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (c)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (d)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (e)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (f)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (g)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (h)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (i)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (j)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable

Element	Flight Authorisation	Geo-consciousness
Article 5.1 [Article 4.1 (k)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (l)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (m)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.1 [Article 4.1 (n)] Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 5.3 Pre-tactical airspace management level 2	Not Applicable	Not Applicable
Article 6.1 Tactical airspace management (level 3)	Amend	Amend
Article 6.2 Tactical airspace management (level 3)	Amend	Amend
Article 6.3 Tactical airspace management (level 3)	Amend	Amend
Article 6.4 Tactical airspace management (level 3)	Amend	Amend
Article 6.5 Tactical airspace management (level 3)	Applicable	Applicable
Article 7 (First part) Safety assessment	Applicable	Applicable
Article 7 (Second part) Safety assessment	Not Applicable	Not Applicable

Rationale for UTMSPs

3.176 We consider that applying TR.100 of this annex would not be appropriate nor proportionate, given it stipulates applying Commission Regulation (EC) 2150/2005 in its entirety, which would require amendment.

3.177 Our rationale for our proposal in 3.174 is that pre tactical airspace management is under the remit of the state provider Airspace Management Cell UK, and so not to be applied for UTM service provision.

3.178 Our rationale for our proposal in 3.175 is that the current tactical airspace management requirements are not generic enough to incorporate UTMSPs, and do not currently facilitate the data and communication requirements.

Proposal for UDSPs

3.179 We propose that this annex does not apply for UDSPs.

Rationale for UDSPs

3.180 This is because UDSPs, as proposed, would not provide Airspace Management (ASM) and so we consider this annex would not be relevant for them.

Annex XIII Part PERS

Context

3.181 This annex requires service providers to implement an ATSEP training and competence framework covering basic, qualification, and system/equipment rating training, including theoretical, practical, and on-the-job components tailored to operational needs. Providers must ensure all ATSEP—employed or contracted—meet required standards, maintain training and competence records, and demonstrate language proficiency. Training must cover key technical domains such as communication, navigation, surveillance, data processing, system monitoring, and maintenance. Providers must also ensure continuation training for system updates and emergency readiness. Competence assessments must evaluate technical, behavioural, and knowledge criteria, with documented procedures for failures, appeals, and supervision of personnel not yet competent. Instructors and assessors must themselves be trained, experienced, and formally qualified, including specific requirements for on-the-job training instructors and technical skills assessors.

3.182 We propose that this annex should be applicable to both UTMSPs and UDSPs However we do not consider that it requires amendment at this time, for both UTMSPs and UDSPs.

3.183 The CAA will consider reviewing Air Traffic Safety Electronics Personnel Training & Competence Requirements CAP 1649, after understanding proposed systems and equipment for ATSEPs, as part of the wider test and trial programme. This will determine which parts of Part PERS are applicable dependent on the type of service being provided.

Question 8: *Do you agree with the CAA's proposed approach to applying elements of existing ATM/ANS regulation to UTM and UDSP services?*

Question 9: *Are there specific areas of the existing regulatory framework that you consider not applicable, not proportionate, or requiring amendment for UTM?*

Additional Cross-Cutting Questions

3.184 These cross-area questions are designed to explore the foundational policy, technical and governance choices that will shape how aeronautical, meteorological and UTM information is delivered, accessed and assured in the UK. As UTM operations scale, information flows will become increasingly machine-to-machine, time-critical and interdependent across multiple actors. Decisions made now about roles, interfaces, data standards, and regulatory expectations will have long-term implications for safety assurance, system resilience, interoperability, market structure, and the pace of innovation.

3.185 These questions therefore seek to identify:

a) Where centralisation or federation is most effective, including whether new roles (e.g., CISPs) are required or whether existing AIS/MET/DAT models can be extended.

b) How many interfaces stakeholders can realistically integrate with, and what this means for operational risk, fallback strategies and information consistency.

c) What minimum data quality, provenance and publication expectations are necessary to maintain trust, enable automation, and ensure seamless coordination between all airspace users.

d) How to ensure interoperability at scale, particularly for flight intent and authorisation data needed for deconfliction and situational awareness.

e) What barriers industry faces today and where targeted regulatory, technical or guidance interventions could unlock progress.

3.186 Taken together, the questions aim to build a shared understanding of the target end-state, identify the dependencies that must be addressed in the near term, and ensure that the resulting framework is proportionate, future-proof, and aligned with safety and performance objectives. This holistic input will support a coherent, evidence-based approach to evolving the UK's aeronautical, meteorological and UTM information ecosystem.

Question 10: *Should a Common Information Service provider (CISP) role be introduced, or is it sufficient to rely on existing service providers? What are the benefits and risks of each approach?*

Question 11: *What are the operational and safety implications of relying on multiple information sources compared to a single access point?*

Question 12: *What UTM-related information or events should be shared with other airspace users, and how should this be communicated?*

Question 13: *What are the biggest challenges you face in information exchange and data consumption for UTM operations?*

Question 14: *In which situations do you rely on authoritative versus non-authoritative data sources, and what risks or mitigations are associated with this?*

Question 15: *What would an effective aeronautical and meteorological information environment for UTM look like?*

Question 16: *What data quality, assurance, and provenance requirements are necessary to support safe UTM operations?*

Question 17: *What information about UTMSPs (e.g. services, availability, airspace coverage) should be made available to airspace users, and how should it be presented?*

Question 18: *What standards and requirements should support flight authorisation and intent sharing between UTM stakeholders?*

Question 19: *Do you consider the proposed framework to be proportionate and workable in practice? Are there elements that may be overly burdensome or incompatible with existing or emerging service models?*

Question 20: *Should existing certificated ANSPs be eligible to provide UTMSP or UDSP services? What safeguards would be required?*

Question 21: *What risks or unintended consequences should the CAA consider in developing the UTM regulatory framework?*

Chapter 4

Proposed Requirements from Other Legislation

This chapter provides an overview of applicable requirements for UTM that can be found in other legislation. The CAA proposes that they should either be applied to UTMSPs/ UTM stakeholders or require amendment to deal with specific incompatible with UTM proposals. Below is an indication of the of potential changes that would be required to embed UTM beyond UK Regulation (EU) 2017/373. Each section begins with a high-level summary of the relevant legislation which is intended as a general overview of the legal framework provided for context only to assist understanding of the CAA's proposals. The summaries do not constitute legal advice, nor should they be taken as an authoritative interpretation of applicable law or regulation.

UK Regulation (EU) No 550/2004 - The Service Provision Regulation (Designation)

Context

4.1 UK Regulation (EU) No 550/2004 establishes common requirements and certification for ANSPs, empowering national supervisory authorities (NSAs) to designate providers for specific services/airspace and to inspect, survey, and enforce compliance. Such certification covers competence, safety and quality systems, reporting systems, liability/insurance, and human resources, with obligations to provide non-discriminatory access and preserve service continuity if certificates are withdrawn.

4.2 It also provides for functional airspace blocks (FABs) and the integration with the Single European Sky (SES) framework, ensuring that service provision is safe, efficient, continuous, and interoperable at EU level.

Proposals

4.3 We propose that Article 8 should be applied proportionality and where necessary for UTMSPs.

Rationale

4.4 We consider that UTMSPs may operate in airspace blocks without the need for exclusivity and therefore it may not be appropriate for Article 8 to be applicable for UTMSPs in all instances.

Railways and Transport Safety Act 2003

Part 5 Aviation: Alcohol and Drugs

Context

4.5 Part 5 of the Railways and Transport Safety Act 2003 creates a specific criminal framework governing alcohol and drug use by aviation personnel. It makes it an offence for anyone performing an "aviation function" — such as pilots, flight engineers, cabin crew, air traffic controllers, or licensed aircraft maintenance engineers — to do so while impaired by drink or drugs.

4.6 The impairment offence does not require a specific alcohol level: any impairment due to alcohol or drugs (including non-alcohol intoxicants) is enough to constitute an offence.

Proposals

4.7 We propose amending section 94 of this legislation which defines the aviation functions within scope of the legislation. The extent of the amendment will be subject to further consultation.

Rationale

4.8 For safety reasons, we consider that this provision should include all personnel who may be considered to be exercising a safety function in support of service provision, such as ATSEPs and FISOs.

Other Applicable Legislation

4.9 The CAA considers the following legislation to be applicable to UTMSPs:

a) UK Regulation (EU) No 1206/2011 (Aircraft Identification for Surveillance for the Single European Sky)

b) UK Regulation (EU) No 1207/2011 (Performance and the Interoperability of Surveillance Regulation)

c) Air Navigation Order 2016 (SI 2016/765)

d) UK Regulation (EU) 923/2012 - Rules of the Air (SERA)

Question 221: *Are there any risks or unintended consequences in applying, and where proposed, amending the legislation referenced in this chapter to UTM?*

Question 23: *Are there specific legislative frameworks that should not apply, or require amendment, to support UTM?*

Question 24: *Is there anything else you would like to tell us that we have not covered in this consultation?*

APPENDIX A

Summary of Questions

1. Do you agree with the proposed roles and descriptors for UTMSPs and UDSPs? Are they clear and workable in practice?

2. Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex V Part MET, from the list provided in 3.87? Please explain your answer alongside any other thoughts or recommendations you may have.

3. Are there any of the proposed policy options for MET that you do not support? Please explain why.

4. Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex VI Part AIS, from the list provided in 3.108? Please explain your answer alongside any other thoughts or recommendations you may have.

5. Are there any of the proposed policy options for AIS that you do not support? Please explain why.

6. Do you have a preferred policy option to address UK Regulation (EU) 2017/373 Annex VII Part DAT, from the list provided in 3.128? Please explain your answer alongside any other thoughts or recommendations you may have.

7. Are there any of the proposed policy options for DAT that you do not support? Please explain why.

8. Do you agree with the CAA's proposed approach to applying elements of existing ATM/ANS regulation to UTM and UDSP services?

9. Are there specific areas of the existing regulatory framework that you consider not applicable, not proportionate, or requiring amendment for UTM?

10. Should a Common Information Service provider (CISP) role be introduced, or is it sufficient to rely on existing service providers? What are the benefits and risks of each approach?

11. What are the operational and safety implications of relying on multiple information sources compared to a single access point?

12. What UTM-related information or events should be shared with other airspace users, and how should this be communicated?

13. What are the biggest challenges you currently face in information exchange and data consumption for UTM operations?

14. In which situations do you rely on authoritative versus non-authoritative data sources, and what risks or mitigations are associated with this?

15. What would an effective aeronautical and meteorological information environment for UTM look like?

16. What data quality, assurance, and provenance requirements are necessary to support safe UTM operations?

17. What information about UTMSPs (e.g. services, availability, airspace coverage) should be made available to airspace users, and how should it be presented?

18. What standards and requirements should support flight authorisation and intent sharing between UTM stakeholders?

19. Do you consider the proposed framework to be proportionate and workable in practice? Are there elements that may be overly burdensome or incompatible with existing or emerging service models?

20. Should existing certificated ANSPs be eligible to provide UTMSP or UDSP services? What safeguards would be required?

21. What risks or unintended consequences should the CAA consider in developing the UTM regulatory framework?

22. Are there any risks or unintended consequences in applying, and where proposed, amending the legislation referenced in this chapter to UTM?

23. Are there specific legislative frameworks that should not apply, or require amendment, to support UTM?

24. Is there anything else you would like to tell us that we have not covered in this consultation?

APPENDIX B

List of Abbreviations

Abbreviations	
AFIS	Aerodrome Flight Information Services
AIC	Aeronautical Information Circular
AIM	Aeronautical Information Management
AIP	Aeronautical Information Publication
AIRAC	Aeronautical Information Regulation and Control
AIRMET	Airmen's Meteorological Information
AIS	Aeronautical Information Services
AISP	Aeronautical Information Service provider
AIXM	Aeronautical Information Exchange Model
AMC	Acceptable Means of Compliance
AMS	Airspace Modernisation Strategy
ANS	Air Navigation Services
ANSP	Air Navigation Services Provider
API	Application Programming Interface
ASM	Airspace Management
ASMP	Airspace Management Provider
ATC	Air Traffic Control
ATCO	Air Traffic Control Officer
ATFM	Air Traffic Flow Management
ATM	Air Traffic Management
ATMSP	Air Traffic Management Service provider
ATS	Air Traffic Services
ATSEP	Air Traffic Safety Electronics Personnel

Abbreviations	
ATSU	Air Traffic Services Unit
BVLOS	Beyond Visual Line of Sight
CAA	Civil Aviation Authority
CIS	Common Information Services
CISP	Common Information Service provider
CNS	Communication, Navigation and Surveillance
CNSS	Communication, Navigation and Surveillance Services
DAT	Data Services
DfT	Department for Transport
DQR	Data Quality Requirement
DSS	Discovery and Synchronisation Service
EU	European Union
FAB	Functional Airspace Block
FIS	Flight Information Services
FISO	Flight Information Service Officer
FIXM	Flight Information Exchange Model
FoF	Future of Flight
GM	Guidance Material
HoVL	Human Over the Loop
ICAO	International Civil Aviation Organization
IFPS	Integrated Initial Flight Plan Processing System
IFR	Instrument Flight Rules
IWXXM	ICAO Meteorological Information Exchange Model
JSON	JavaScript Object Notation
NOTAM	Notice to Airmen
MAC	Mid-Air Collisions
MET	Meteorological Services

Abbreviations	
METARs	Meteorological Aerodrome Reports
MOC	Means of Compliance
NSA	National Supervisory Authorities
OR	Operational Requirements
QVA	Quantitative Volcanic Ash forecast
RATE	Recognised Air Traffic Environment
RPAS	Remotely Piloted Aircraft System
SADIS	Secure Aviation Data Information Services
SES	Single European Sky
SIGMET	Significant Meteorological Information
SLA	Service Level Agreement
SMS	Safety Management System
SO	Strategic Objective
SP	Service provider
SPECI	Special Meteorological Report
SUA	Special Use Airspace
TAF	Terminal Aerodrome Forecast
TCAC	Tropical Cyclone Advisory Centre
UA	Unmanned Aircraft
UAS	Unmanned Aircraft System
UD	Unmanned Aircraft System Traffic Management Data
UDSP	Unmanned aircraft systems datya service provider
UTM	Unmanned Aircraft System Traffic Management
UTMSP	Unmanned Aircraft System Traffic Management Service provider
VAAC	Volcanic Ash Advisory Centre
WAFC	World Area Forecast Centre