



## Airlines for America®

*We Connect the World*

January 3, 2024

Mike Kane  
Minister for Aviation  
Department for Transport  
Great Minster House  
33 Horseferry Road  
London SW1P 4DR

Rob Bishton  
CEO  
Civil Aviation Authority  
Westferry Circus  
Canary Wharf  
London E14 4HD

RE: Airspace Design Service Consultation

Dear Minister Kane and Mr. Bishton,

On behalf of our member carriers<sup>1</sup>, Airlines for America (A4A) appreciates the opportunity to provide comments on the Department for Transport's (DfT) and Civil Aviation Authority's (CAA) airspace design service consultation. A4A members operate extensive services to the UK and have a strong vested interest in the outcome of this consultation. We support the comments IATA has submitted but wish to supplement them with brief observations of our own.

As an initial matter, we applaud the UK government's efforts to champion implementation of airspace modernization which would allow additional flying by generating greater efficiency. Efficiencies that can be found through successful modernization include relieving some congestion at key international airports like London Heathrow while also providing a significant reduction in greenhouse gas emissions. This is a key priority for our member airlines who are implementing extensive measures to reduce their carbon footprint and are making significant investments to achieve net-zero CO<sub>2</sub> emissions by 2050. In line with this, we keenly support modernization that results in reduced fuel burn as a key driver for sustainable aviation development.

We share the view that airspace modernization is long overdue because the current airspace model does not deliver optimal service. DfT and CAA acknowledge that "evidence shows that the current, fragmented market-based approach to airspace change is not working as intended." Given the urgency of this reform, we respectfully request the DfT and CAA to expedite implementation of this project by treating it as a nationally critical infrastructure. Such treatment is consistent with the priority status that the government accorded airspace modernization in its election manifesto.

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<sup>1</sup> Airlines for America (A4A) members are Alaska Air Group, Inc (including Hawaiian Airlines).; American Airlines Group, Inc.; Atlas Air Worldwide Holdings, Inc.; Delta Air Lines, Inc.; FedEx Corp.; JetBlue Airways Corp.; Southwest Airlines Co.; United Airlines Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

Furthermore, we note the immense scale of end-state UKADS and even with the suggested two step UKADS1 and UKADS2 proposal, there will be great reliance on available staff and infrastructure resources. There needs to be open conversations about the expertise and personnel that will be needed to execute the proposed plan. This will include personnel from Air Traffic Control Officers to airspace experts, engineers and others. When planning, consideration must be taken to the impact on the En Route part of NATS (En Route) plc (NERL).

We thank you for your kind attention and look forward to working together collaboratively to ensure the creation of an efficient and effective airspace design for the UK. We have outlined specific points in regard to the consultation questions below:

**Single Entity:** We support the appointment of a single entity with responsibility for designing UK airspace. This is consistent with the approach taken in other countries including the United States. A single entity should have responsibility for designing the procedures as well as providing coherence and strategy on a national level. The entity should take advantage of the pool of expertise in designing procedures and airspace management that exists under current arrangements.

Consolidation will help improve communication and coordination as previously, there have been several different working groups in the UK tasked with some portion of airspace redesign such as ICAMS (Industry Coordination for the Airspace Modernization Strategy), ODLG (Operations Directors Liaison Group), and ACOG (Airspace Change Organising Group) and it is hard to keep current and aware with each organization's objectives, tasks and results.

**Prioritization of London Cluster:** We agree that modernization of the London cluster should take priority because it offers the potential to produce the greatest benefits. However, design of the London Terminal Maneuvering Area (TMA) needs to take into account surrounding airspaces and cross-border connectivity. In addition, this is a national project, and resources should not be diverted from other Airspace Change Proposals (ACPs).

**Role of the CAA:** The CAA should have general oversight responsibility for the project. In particular, the CAA should address any conflicts of interest that may arise during the project's implementation. We also recommend that the CAA assume the role of independent manager of a UK Airspace Design Support Fund if this option is implemented.

**Governance:** The government should clarify accountabilities and responsibilities, transition steps, processes to propose/accept new ACPs, consultation processes, etc. all with a view to realize the "nation-wide" vision underlying the project. It should also clarify the decision-making process – who makes decisions and how. We recommend that the government conduct a fulsome review of lessons learned in the first phase before moving to the second phase of the project.

**Consultation:** We support the creation of a permanent advisory board consisting of all stakeholders to advise on airspace design at the operational and strategic levels.

**Funding:** Under the user pays principle, all airspace users benefiting from airspace design should be required to fund this project. This includes military airspace users, general aviation, drones and high airspace operations, which might have airspace design requirements. It should also include airports where they benefit from the airspace design. The government should provide detailed information on its cost calculations.

Please do not hesitate to contact me if you have any questions or require further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Glatz". The signature is fluid and cursive, with the first name "Keith" written in a smaller, more compact script and the last name "Glatz" written in a larger, more prominent script.

Keith Glatz  
Senior Vice President, International Affairs