THE NEW ATCO TRAINING REQUIREMENTS

ABSTRACT

Air traffic controller (ATCO) training is strictly regulated since air traffic controllers provide air traffic control service and influence safety. During their training, air traffic controllers (ATCOs) have to acquire competences with specific rating and endorsement. This enables them to gain ATCO license for independent provision of air traffic control service. The paper will analyze the current ATCO training requirements and licensing procedures as well as the new European regulation that has entered into force in March 2015 and shall apply from 30 June 2015. The new regulation reinforces the procedures for ATCOs training and certification in three major fields: requirements for the licensing of air traffic controllers, requirements for competent authorities and requirements for air traffic controller training organizations and aero-medical centers. Major differences between the current and the new regulations regarding the initial part of ATCO training and training organizations will be defined and analyzed.

KEY WORDS: Air traffic controller, training, requirements, regulation, licensing, training organizations

1. INTRODUCTION

Air traffic control is a part of a widespread air traffic management system, with safety as its primary concern, i.e. maintaining separation between aircraft, but also an orderly and expeditious traffic flow. Air traffic controllers have to be highly trained and skilled professionals since they are directly involved in aircraft operations. They decide on resolving conflicting situations and maintaining separation between aircraft. Poor, late or incomplete decisions may potentially affect the safety of a flight and persons on board. For that reason, controllers go through extensive and encompassing training in order to obtain their license. Due to the specificities and constant changes in technical and technological systems and work functions, controllers are often subjected to competence checks and refresher courses during their professional career, in order to develop automatic skills for routine and common situations, and procedures. During the last few decades, the ATCO training process and conditions for obtaining an ATCO license have often differed and changed with time, taking into consideration different legal, technical and technological characteristics of ATCOs’ work. Their work is characterized by two major features: safety and the amount of traffic they can handle (traffic demand). ATCOs must be trained and capable of effectively coping with
the workload and routine tasks in the periods of high and low traffic demand, but also with unusual and emergency situations if safety is jeopardized. According to the statistical data provided by EUROCONTROL (European Organization for the Safety of Air Navigation), there has not been a single accident caused by air traffic management services for the last three years [1].

In order to ensure the high level of safety as well as ATCO's high level competences in service provision, international organizations and authorities have recognized the need to introduce detailed uniform standards and requirements for ATCO training, which include ATCO training organization requirements, medical centre requirements and competent authority requirements. The lack of uniformity could cause a different way of providing air traffic services and, naturally, a different way of providing air traffic controller training, including duration and content. In other words, air traffic controllers were trained for the type of equipment, procedures and technology which were used in the working positions in specific national conditions[2]. The International Civil Aviation Organization (ICAO) has prescribed the minimum requirements for ATCO training in Annex 1 - Personnel Licensing for All Member States. Over the course of the last decade, the European Union (EU) has harmonized the process of ATCO training and licensing in the way that all persons and organizations involved in their training, testing, checking and medical examination, and assessment must adhere to the relevant safety requirements [3]. As an EU member, Croatia is obliged to comply with all the requirements prescribed in all ATCO related regulations.

2. AIR TRAFFIC CONTROL SERVICE

As stated earlier, the main function of air traffic control is to maintain separation between aircraft but also to ensure orderly and expeditious conduct of flight. ATCOs oversee and control the assigned airspace by making use of the license obtained upon completion of ATC training, and also the license to use radiotelephony communications, which is the means of operations for both them and the pilots. ATCOs also give advice on traffic resolution and information to aircraft during flight. The provision of these activities is called flight information service (FIS). In case of an emergency, when there is reasonable doubt that aircraft is experiencing a difficult time, ATCOs start one of the emergency phases (uncertainty, alert, or distress phase) and notify appropriate organization if aircraft is in need for search and rescue. Provision of these activities is referred to as alerting service (ALRS). These three services are called air traffic services. Air traffic control services are divided into three different types provided by three different air traffic control units:

1. Aerodrome Control Service provided by Aerodrome Control Tower (TWR)
2. Approach Control Service provided by Approach Control Unit (APP)
3. Area Control Service provided by Area Control Centre (ACC)

ATCOs are trained and certified for one of these services and this is indicated in the ATCO license as a rating and endorsement that prove one's competence in specific service provision.

3. CURRENT ATCO TRAINING AND LICENSING

The ATCO training requirements are defined on global, regional and national level. Due to the uniqueness of air traffic characterized by high standards of safety, a long-term increase in
traffic demand and its global character, the ICAO as the leading international organization in the field of civil aviation prescribes minimum standards and recommended practices for 19 different fields and likewise for aviation personnel licensing.

As ICAO prescribes minimum requirements, it is left to the specific region of the world and individual countries to develop these requirements in more detail. Therefore, the European Union as political and economic union has brought out own set of rules and regulations regarding ATCO training and licensing, which are based on the ICAO’s minimum standards and recommended practices. The major international and European regulations regarding ATCO training are:

- ICAO Annex 1 - Personnel Licensing
- EUROCONTROL Specification on Common Core Content Initial Training

3.1. ICAO Annex 1– Personnel Licensing

Chapter 4 of this document prescribes the minimum requirements for licenses and ratings of personnel other than flight crew members such as aircraft technicians, engineers, mechanics, air traffic controllers and aeronautical station operator. The field of air traffic controller training defines the following areas: Student ATC license, ATC license and Ratings.

**Student ATC License** is the first license ATCOs obtain during their training. It is a prerequisite to start the training in live traffic situation in real ATC environment and at the real working position. It is the most sensitive part of training because ATCO candidates directly influence safety, so it must be provided under the supervision of certified instructors. That is the reason why ICAO prescribes a candidate does not constitute a hazard to air navigation. Before acquiring a Student ATCO license, a candidate must hold a current ICAO Class 3 Medical Assessment Certificate.

**ATC License** is obtained after the successful completion of ATCO training and it gives ATCOs privileges to provide particular air traffic control service within a specific area of responsibility. The ICAO defines in more detail several areas within this part of training such as age, knowledge, experience and medical fitness, with each requirement defining its own conditions. The trainee must be 21 or older and has to demonstrate a minimum knowledge of the aforementioned topics, i.e. the subjects and their content (Air Law, General Knowledge, ATC Equipment, Human performance, Meteorology, Navigation and Operational Procedures). At the same time, it prescribes that the future ATCOs are required to complete the training for a particular endorsement and spend at least 3 months at their working position and provide ATC services in real-world environment under supervision of an ATCO in charge [4]. The same as for Student ATC license, ATCOs that apply for ATC license must hold ICAO Class 3 Medical Assessment certificate.

**Ratings** are defined with the category of air traffic controller ratings, requirements for air traffic controller ratings, privileges of the holder of the air traffic controller rating(s) and the conditions to be observed in exercising such privileges. As stated earlier, the rating is defined as specialized knowledge and skill related to a type of air traffic control and ATS working environment. The ICAO defines following categories of ratings: aerodrome control rating, approach control procedural rating, approach control surveillance rating, and approach
precision radar control rating, area control procedural rating and area control surveillance rating.

To have experience means that ATCO candidates have provided air traffic control service (in number of hours required) in real environment and live traffic under the supervision of a certified ATCO. Minimum number of periods for aerodrome control rating is minimum 90 hours or one month (whichever is greater), for approach control surveillance and area control surveillance is minimum 180 hours or three months (whichever is greater) [4].

Skills define a level appropriate to the privileges being granted, taking into consideration judgment and performance required to provide a safe, orderly and expeditious control service, including the recognition and management of unusual situations and errors.


The regulation is the groundwork for air traffic safety in Europe and it concerns all licensed personnel involved in air traffic. The EU regulation defines common framework in civil aviation and foundation of EASA, hence the name EASA Basic Regulation. It is essential for establishing and maintaining a unique high level of civil aviation safety in Europe. Furthermore, it regulates the free movement of goods, persons and services in aviation and promotes cost-efficiency in the regulatory and certification processes to avoid duplication at national and European level [5]. It provides a detailed procedure for training and licensing of pilots.

Training and licensing of air traffic controllers is defined by the amending Regulation (EC) No 1108/2009., which refers to the following areas in aviation that have not been included in the EASA Basic Regulation: Aerodromes, Air Traffic Management and Air Navigation Services. The regulation refers to all Airspace users, services (AIS, MET, CNS, ATM, ATFM, ASM, Airspace Design), the required qualifications that ATCOs have to obtain as well as requirements for organization providing training, and providers of air traffic services [6]. Annex Vb of the regulation states the essential requirements and demands for ATCOs and organizations providing training, examination and medical testing, which are under supervision of the EASA. The following contents of ATCO training are regulated: General, Theoretical Knowledge, Practical Skills, Language Proficiency (English and national), Synthetic Training Devices for practical part of training, Training courses, Instructors, Assessors, Medical Fitness, ANSP and Training Organizations.


Commission Regulation (EU) No 805/2011 (further on Current Regulation) is still valid and it is the basic document that defines the detailed specifications on the licenses of student ATCOs and ATCOs for European Union member states, and it is based on EASA Basic Regulation. It lays down the area of certification and qualifications of ATCOs based on three reasons. The first reason is to ensure the highest level of safety in providing Air Traffic Control service, which is based on the simple rules of conduct, training supervision and licensing. The second is increasing confidence in ATCO training and ATC service provision in member states, since the basic knowledge and competences and learning objects that the ATCOs acquire are unified during training. The third reason arises from the market competition and ATCO license, which is unified in the EU and enables ATCOs to seek employment with the EU, thereby increasing the employment prospects.
The regulation defines training as “...the entirety of theoretical courses, practical exercises, including simulation, and on-the-job training required in order to acquire and maintain the skills to deliver safe, high quality air traffic control services. It consists from Initial Training, Unit Training, Continuation Training, Training of On-the-Job Training Instructors and Training of License Holders.

Initial training consists of basic training and rating training. Upon successful completion of Initial training, a candidate obtains a student an ATCO license. As stated earlier, this license is a prerequisite for working in real ATC environment and live traffic, which is a part of training (unit training) [5]. Unit training is provided at air navigation service provider's training organization and consists of transitional training, pre-on-the-job-training (Pre-OJT) and on-the-job-training (OJT). After successfully completing the unit training, a candidate obtains an ATCO license for specific type of air traffic control service with specific ATS environment. An ATCO license ensures that every air traffic controller has the privilege to work individually in live traffic and provide specific type of air traffic control service. Continuation Training is used by certified ATCOs, after obtaining an ATCO license. It comprises refresher courses, emergency training and conversion training when certified ATCOs change job category (rating discipline, rating endorsement or unit endorsement), or system capabilities.

The regulation prescribes minimum requirements for Student ATCO license application. Only persons that are 18 or older, and have valid medical certificate can apply for the license. These persons must satisfy the following conditions also: they have successfully completed the initial training course in the certified organization, hold at least a diploma granting access to university and have the required level of language proficiency. The regulation defines training requirements concerning initial, unit training and continuation training, language proficiency requirements as well as for ATCO training organizations and competent authorities.

In Annex II, Part A of Current Regulation it is stated that Initial training program must be conducted in accordance with EUROCONTROL’s Specification for the ATCO Common Core Content Initial Training. The learning objectives of the subjects and topics differ during training for each type of air traffic control service. The basic part of training can be integrated with the rating training or separately provided by one or two training organizations. If provided separately, a certified training organization has to issue a certificate that certifies one has completed basic or rating training. In the case that basic and rating training are integrated in a single training, a certified training organization has to issue a certificate that certifies one has finished initial training. The Initial Training consists of theoretical subjects and practical simulation exercises. The duration of the complete training and individual subjects is not prescribed and it is left up to the training organization. Acquired skills shall ensure that the candidate be considered competent to handle complex and dense traffic situations, facilitating the transition to unit training [5].

3.4. EUROCONTROL’S Specification for the ATCO Common Core Content Initial Training

EUROCONTROL’S Specification for the ATCO Common Core Content Initial Training (further on Specification) contains the curriculum for the initial ATCO qualification training. The Specification defines all the phases of the ATCOs training and their progress.
As stated earlier, Current Regulation defines that initial training in EU member states must be provided in accordance with this Specification and that will ensure the level of competence the candidate must possess at the end of the training. The Specification requirements are prerequisites for obtaining a Student ATCO License in accordance with this Regulation. According to the Specification ATCO training has 4 different phases: initial training as the first type of training a candidate attends, followed by unit training, continuation training and development training [7]. Development training has not been listed under that name in Current Regulation although it is held as a set of various qualification trainings, which enable ATCOs to professionally develop further as part of their life-long learning process.

Initial training is the first phase of ATCOs qualification training, which comprises both basic and rating training, and it is intended for the so-called *ab initio candidates*. As stated earlier, these can be a part of an integrated training or conducted separately. Upon successful completion of both parts of qualification, candidates possess competences to handle complex traffic situations and have all necessary prerequisites for obtaining a Student ATCO license. Basic training focuses more on theoretical subjects, and less on practicing skills on a simulator, which is what Rating Training aims to do. The latter can be referred to as specialized training for acquiring knowledge and skills needed for a particular type of air traffic control and live environment.

Unit training is the second phase of training, which encompasses transitional training, pre-on-the-job-training and on-the-job training. This type of training is only available for candidates that have already obtained their ATCO license. After successfully completing all three parts of the training, candidates possess competences to handle very complex traffic situations using the one type of air traffic control service then emergency procedures, procedures specific for the location and environment they are working at. After finishing unit training candidates have all necessary prerequisites for acquiring an ATCO license with specific endorsement and location where ATC will be provided. Within the curriculum of initial training, the Specification defines the topic, subtopic and learning objectives, and the level of knowledge (taxonomy) for each subject.

4. ATCO TRAINING IN CROATIA

In the Republic of Croatia there are two certified air traffic control training organizations: Croatia Control ltd. (CCL) and Croatian Air Traffic Control Training Centre (HUSK). Certification and continuous supervision of these two organizations is done by national competent authority – Croatian Civil Aviation Agency (CCAA). The process of issuing and maintaining certificates is done in accordance with earlier stated international and European requirements but also according the national Regulation on licenses, rating and endorsements of air traffic controllers [8] (further on National Regulation). National regulation prescribed all subjects that were not defined in European regulations but were defined in Specification.

4.1. CCL

CCL is Croatian air navigation service provider, whose ATCO training organization is certified for provision of Unit Training. CCL as the national air navigation service provider is certified for air navigation services but also for ATCO training. The main objective of this ATCO training is to educate and train new ATCO stuff, whose competences are at the highest
level which will ensure safe and high-quality air traffic control services within its area of responsibility.

4.2. HUSK

HUSK is a unit established at the Faculty of Transport and Traffic Sciences of the University of Zagreb that is certified to provide basic training. HUSK is certified for two different training programs: an integrated training program incorporated in undergraduate study of aeronautics (air traffic control module) and a modular training program provided as a separate course lasting for 14 weeks. Upon successful completion of the basic training, candidates receive a certificate with a list of all the subjects of the approved program according to requirements of Current Regulation [9]. Specification and the ATCO training organization certificate number approved by CCAA.

When ATCO training phases necessary to obtain ATCO license defined in Current Regulation are compared to the ATCO training phases provided in Croatia, it is evident that there is not one certified organization that provides rating training. That is why Croatian air traffic control candidates, after finishing basic training in Croatia, attend rating training abroad in a certified foreign ATCO training organization. After successful completion of rating training they return to Croatia and gain student ATCO license at the competent authority. That enables them to start unit training in CCL.

5. NEW EUROPEAN ATCO TRAINING REQUIREMENTS

The currently valid Current Regulation has been introduced to harmonize the requirements of training ATCO in the EU, which ensures competences that enable them to provide air traffic control services as well as safe and regular traffic flow in routine procedures of an aircraft. The implementation of Current Regulation and precisely defined demands for all training organizations and personnel involved in conducting training with other factors (sophisticated safety nets within ATM Systems) have brought to improvement of the ATM system in Europe, which is evident in the data of accidents caused by air navigation service providers, as stated earlier.

The main European organizations dealing with ATCO training, EUROCONTROL and EASA (European Aviation Safety Agency), which are aid organizations to the European Commission at passing regulation, had initiated a work group several years ago, with an aim of keeping the good and developing the improved demands, falling back on the previous practice.

All interested parties were able to take part in public talks registering through EASA. A following regulation is the result of the talks: the new Commission Regulation (EU) 2015/340 relating to air traffic controllers' licenses and certificates (further on: New Regulation). New Regulation that has entered force, and shall apply from 30 June 2015 goes further in that it regulates the area even more strictly, insisting on greater competences of ATCOs in provision of ATC service. Due to the larger number of changes and additions to the currently valid regulation, the EU has enabled its state members to, in cooperation with their own training organization, decide whether to postpone (derogue) the new regulation to a year and a half for its application. Besides ATCOs and training organization requirements, New Regulation also defines requirements for competent authorities and aero-medical centers.
In the Table 1 major differences between Current regulation and New Regulation requirements regarding Initial Training are analyzed. Since the Current Regulation is not as precisely defined as the new one, some of the requirements were taken from National Regulation or Specification. In the left-hand column of the table the new requirements regarding Initial Training are stated. On the right-hand column of the table there are three different rows. The first row (green color) connects New Regulation requirement with Current Regulation. The second row (red color) connects New Regulation requirement with the National Regulation or Specification. The third row (blue color) gives an explanation of the new requirement. N/A stands for not applicable.

**TABLE 1. MAJOR DIFFERENCES BETWEEN CURRENT AND NEW REGULATION REGARDING INITIAL TRAINING**

<table>
<thead>
<tr>
<th>REQUIREMENT ACCORDING TO NEW REGULATION</th>
<th>Current Regulation</th>
<th>National Regulation or Specification</th>
<th>Explanation of New Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>Requirements for instructors and assessors</td>
<td>N/A - left for national regulations</td>
<td>Theoretical and practical instructors</td>
<td>In Subpart C, Section One requirements for instructors (theoretical, practical, OJTI and STDI) are prescribed. In Subpart C, Section Two – requirement for assessors are prescribed.</td>
</tr>
<tr>
<td>Theoretical instructors - conditions</td>
<td>N/A - left for national regulations</td>
<td>3 years of experience in the field of aviation and applicable to competent authority)</td>
<td>Demonstration of instructional skills to the training organization</td>
</tr>
<tr>
<td>Practical instructors - conditions</td>
<td>N/A - left for national regulations</td>
<td>Practical instructor for unit training (a person that holds valid ATCO license and worked at least 5 years as OJTI) and practical instructor for initial training (a person who holds or had hold valid ATCO license and has minimum 3 years of experience as ATCO)</td>
<td>A person that holds an air traffic controller license with an on-the-job training instructor (OJTI) endorsement or a synthetic training device instructor (STDI) endorsement.</td>
</tr>
<tr>
<td>STD instructors - conditions</td>
<td>N/A</td>
<td>N/A</td>
<td>Persons providing practical training on synthetic training devices that has exercised the privileges of an air traffic controller license in any rating for at least two years and successfully finished within the year preceding the application a practical instructional techniques</td>
</tr>
<tr>
<td>Assessors endorsement</td>
<td>N/A - left for national regulations</td>
<td>Used in assessments during unit training</td>
<td>Used in assessing the: - initial training for the issue of a student air traffic controller license or for the issue of a new rating and/or rating endorsement, - unit training, for assessing student air traffic controllers or air traffic controllers for the issue of a unit endorsement and rating endorsements, - the competence of an applicant for the issue or renewal of an STDI endorsement</td>
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</tbody>
</table>
| 6. | STD – Synthetic Training device definition | N/A - left for national regulations  
Simulation devices  
Device by which operational conditions are simulated, including simulators and part-task trainers. |
| 7. | STDI endorsement | N/A  
Authorization entered on and forming part of a license, indicating the competence of the holder to give instruction on synthetic training devices |
| 8. | License endorsements | Unit Endorsement, Language Endorsement, Instructor Endorsement  
Unit Endorsement, Language Endorsement, Instructor Endorsement  
OJT Instructor endorsement, STDI endorsement, Assessor endorsement |
| 9. | Basic training definition | N/A  
N/A  
Theoretical and practical training designed to impart fundamental knowledge and practical skills related to basic operational procedures |
| 10. | Initial training composition | N/A  
N/A  
Consist of basic and rating training comprising all defined the subjects, topics and subtopics |
| 11. | Initial training plan | Initial training requirements  
N/A - given as a part of ATCO TO Operations manual  
Detailed plan of training structure, duration, training methods, examination and assessment process etc. |
| 12. | Examination of basic and rating courses | N/A  
N/A  
Separate or integrated basic and rating training. |
| 13. | Basic training examinations and assessment | N/A  
N/A - only theoretical examinations (simulations included)  
Theoretical examinations and assessments |
| 14. | Basic training performance objectives | N/A  
N/A  
During assessments candidates will be evaluated in the many performance objectives such as detecting potential conflicts between aircraft, applying separation, use RT communication etc. (ATCO.D.030) |
| 15. | Rating training examinations and assessment | N/A  
N/A - only practical examinations on simulation devices  
Theoretical examinations and assessments |
| 16. | Rating training performance objectives | N/A  
N/A  
Defined for each rating training course. Candidates must be able to demonstrate the ability to manage air traffic in a manner that ensures safe, orderly and expeditious services; and handle complex and dense traffic situations (ATCO.D.040) |
| 17. | Training of instructors and | N/A  
N/A - given as a part of ATCO TO Operations manual |
<table>
<thead>
<tr>
<th></th>
<th>assessors</th>
<th>Detailed plan of training (ATCO.D.090 and ATCO.D.095)</th>
</tr>
</thead>
<tbody>
<tr>
<td>18.</td>
<td>Language proficiency</td>
<td>Expert level (level six) for the English language and national language unlimited</td>
</tr>
<tr>
<td></td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Expert level (level six) for the English language - nine years from the date of assessment, Expert level (level six) for the national language – unlimited</td>
</tr>
<tr>
<td>19.</td>
<td>Age – air traffic controller license</td>
<td>Candidate must be at least 21 years old.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Candidate must be at least 21 years old.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Not prescribed</td>
</tr>
<tr>
<td>20.</td>
<td>Examination and assessment results and certificates – Basic training</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td></td>
<td>A separate certificate must be issued</td>
</tr>
</tbody>
</table>

As it can be seen from the table New Regulation requirements in more detail and more strictly prescribe and supplement Current Regulation. Conditions for training organization and persons evolved with ATCO training are strengthened in New Regulation.

Requirements regarding Synthetic Training Device (STD) are prescribed for the first time with the main aim to differentiate simulation training from an on-the-job training as well as STD instructors (STDI) from OJT instructors. A person who fulfills required conditions gains STDI endorsement which is a part of license endorsements. Another difference that must be pointed out is process of assessment during initial training (even during basic part of training) provided by person who has an assessor endorsement. English proficiency is different in New Regulation since it prescribes that ATCOs with expert level need to be evaluated after 9 years.

After successful finishing of unit training student ATCOs can apply for ATCO license even before they are 21 years old.

Every training organization certified for initial training must prepare its organization structure, documentation, responsible persons, procedures, plans and programs to be able to implement and comply to these novel requirements. Organizations within ANSPs that provide unit training must consider the rest of requirements.

### 6. CONCLUSION

Based on the analysis of the valid and new regulations, ATCO training is a strictly defined area on a global and European level. The ICAO standards as well as recommended practices listed in Annex 1 define the minimum requirements in ATCO qualification. The only condition that is wholly accepted and does not adhere to the stricter standards on the regional level is Medical fitness Class 3, which ATCOs have to maintain during a year of work.

The ATCO training has been defined in legislation in more detail on the European scale than on the global (The ICAO), with an aim to harmonize and develop equal requirements of training and certification for ATCOs in all its state members. This strict regulation will ensure a high level of knowledge and competences, which are to be applied in air traffic control service provision with main objective to maintain required safety level and efficiency. The organizations that conduct certain phases of training are going to have to adapt in the months to come, or they will request to postpone the application of the new regulation until 31
December 2016. In that case current regulation EC805/2011 will still be used. Initial training organizations must take into consideration major differences between the new and the current regulation, as analyzed in previous chapter and adapt to it.

At the end it can be concluded that New Regulation will strengthen and stricken the requirements of licensing and certifying ATCOs, which will in turn affect the adjustment of the existing training providers – if they wish to keep hold of their current certificates and continue to train ATCOs for the phases of qualification that they are certified to do. To ATCOs the new regulation enables a much clearer and easier competence development, which should be equally acceptable in all EU state members, which will in turn improve employment prospects as well.

REFERENCES


