

# Level of Service

Terms of Reference

Review of the Time in Position Fatigue Limit

on

Aerodrome Advisory Service

NAV CANADA  
Level of Service  
151 Slater Street  
Ottawa, ON K1P 5H3

December 2024

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# 1. Purpose

The objective of this Terms of Reference is to initiate an Aeronautical Study (the “Study”) to review the Fatigue Limits, specifically the required breaks related to Time in Position, as part of the Fatigue Risk Management System (FRMS), for overnight shifts at facilities operating 24-hours per day, and the impact to the Aerodrome Advisory Service (AAS) and Remote Aerodrome Advisory Service (RAAS) provided by Flight Service Stations (FSS).

## 2. Scope of Study

The Study will assess the potential impact of service interruptions resulting from the Time in Position Fatigue Limit, specifically the required Time in Position breaks and mitigations associated with these breaks, at FSS during the overnight shift on users and stakeholders.

## 3. Background

The Civil Air Navigation Services Commercialization Act (CANSCA) states that as a designated authority NAV CANADA is responsible for providing Air Traffic Services (ATS) for the purposes of ICAO Annex 11. In November 2020, ICAO Annex 11 was amended to include Fatigue Management Regulations, requiring member states to establish regulations to manage fatigue in the provision of ATS. Transport Canada Civil Aviation (TCCA) provides the regulatory framework for fatigue management, while NAV CANADA is responsible for managing fatigue-related risks. There is also a Fatigue Management Program that provides processes for monitoring and managing fatigue hazards.

In 2022, NAV CANADA created its Fatigue Risk Management System (FRMS) to establish and comply with TCCA fatigue risk guidance, develop the Fatigue Management Policy and Standards, and create the first operational Fatigue Limits at NAV CANADA.

NAV CANADA has operational Fatigue Limits to manage fatigue risk at all ATS units. One of these Fatigue Limits is the continuous time allowed in an FSS work position before a break is required. Depending on aircraft traffic levels, this limit is four hours in a low-intensity work environment or two hours in a high-intensity work environment.

Flight Service Stations provide AAS and RAAS throughout Canada. In all, 91 Aerodromes receive either AAS or RAAS. AAS and RAAS provide aircraft traffic information within the vicinity, runway conditions, airport wind and weather conditions, coordinate airport ground vehicle operations and emergency assistance. Designated FSSs provide RAAS, utilizing Remote Communications Outlets (RCOs) for local communication. This study applies only to those 24-hour facilities with single stand overnight shifts.

## 4. Methodology

The Study will identify, assess, and analyze information gathered through data collection and user and stakeholder consultation. The Study will:

- 1) Confirm stakeholder requirements for the services under review,
- 2) Analyze the concerns and issues raised by the stakeholders,
- 3) Develop possible solutions and options,
- 4) Conduct a Hazard Identification and Risk Assessment on issues, as required,
- 5) Present recommendations for Executive Management and Board of Directors approval,
- 6) Coordinate with the appropriate managers who would be involved with the technical and operational implementation of any proposed service change and,
- 7) Coordinate with Transport Canada.

## 5. Human Resources

The Study team will be multidisciplinary, with representation as required from crucial operational, technical and support areas.

The Study team will ensure that consultation with affected or interested stakeholders is sufficient before making recommendations to senior management.

The Study team will conduct a risk analysis and may call upon stakeholders to contribute to assessing some risk scenarios.

Team Leader: Manager, Level of Service

Contributors:

- Specialist, Level of Service,
- Managers/Staff in all Flight Information Regions,
- Aeronautical Information Management,
- NAV CANADA Technology Group,
- NAV CANADA Corporate Performance,
- NAV CANADA Stakeholder and Industry Relations and,
- Others as required.

## 6. Work Management Plan

TOR approval: December 2024

When conducting the Study\*, the following will be undertaken:

- 1) Develop a Communication and Consultation Plan – (December 2024 and January 2025)
- 2) Study commencement – (January 2025)
- 3) Consultation – (January to March 2025)
- 4) Assess consultation input – (March to April 2025)
- 5) Conduct Issues Hazard Identification and Risk Assessment – (April 2025)
- 6) Finalize Aeronautical Study report – (May 2025)
- 7) Executive Management and Board of Directors approval – (July 2025)

If a change proposal is approved:

- 8) Issue a Notice of Proposal – (July 2025)
- 9) Circulate concluded assessment to Transport Canada for safety review – (Fall 2025)

Following Transport Canada concurrence:

- 10) Coordinate implementation plan and dates with appropriate departments – TBD
- 11) Prepare the Aeronautical Information Management submission – TBD
- 12) Prepare and publish an Aeronautical Information Circular – TBD
- 13) Prepare and publish Notice –TBD
- 14) Implement – TBD
- 15) Monitoring / Post-Implementation Reviews – TBD

\* Study timelines may be subject to adjustment.

## 7. Materiality of the changes

Some proposed service delivery options may represent a material change to a significant group of users. If this is the case, formal notifications per the Civil Air Navigation Services Commercialization Act will apply.

## 8. Finance Resources

Service design changes may generate an engineering support requirement. These requirements will be identified as the study progresses in support of initiating project planning for implementing engineering-related recommendations from the study.

## 9. Consultations

An appropriate consultation plan will be prepared. It will include formal stakeholder consultations to determine if any issues exist and what mitigations may be required if changes are recommended to provide air traffic services and airspace classification or structure.

Aviation organizations representing airports, general aviation, business aviation and others, as appropriate, will be consulted during the Study. A list of users and stakeholders consulted will be attached to the Study.

Should you have any questions or wish to provide input to the Study, you may do so by emailing [studies.etudes@navcanada.ca](mailto:studies.etudes@navcanada.ca) or by writing to:

Courier/Civic Address	Mailing Address
NAV CANADA Level of Service 151 Slater Street Ottawa, ON K1P 5H3	NAV CANADA Level of Service PO Box 3411, Station T Ottawa, ON K1P 5L6

## 10. Safety Management Plan

NAV CANADA will prepare a project safety management plan that identifies implementation responsibilities resulting from the Study, including mitigation and monitoring actions to implement the service change.

## 11. Authority

This document has been issued under the authority of the Assistant Vice President, Stakeholder and Industry Relations.