



**GUIDANCE MATERIAL  
FOR  
Aircraft Tracking**

**Approved by**



**(Chula Sukmanop)**

**Director General**

**The Civil Aviation Authority of Thailand**

**Original, 30 April 2019**

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## ISSUE APPROVAL

This Guidance Material (GM) contains the standards, policies, procedures and guidelines concerning the Thai Air Operator Requirement (AOCR) and is published for use by The Civil Aviation Authority of Thailand (CAAT) personnel delegated with the responsibility of certifying Air Operators shall comply with all provisions in this GM during the certification process

In addition, this GM contains instruction in respect of certification to be eligible to conduct by Air Operators for guidance to reach the CAAT requirement. Amendments to this GM will be notified through [www.caat.or.th](http://www.caat.or.th).

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## RECORDS OF REVISION

Revision No.	Issue Date	Date Inserted	Inserted by
Original	30 April 2019	30 April 2019	CAAT (OPS)

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## REVISION HIGHLIGHTS

Chapter/Section	Description of Change
All	New issue



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## AIRCRAFT TRACKING

### 1. GENERAL.

Pursuant to AOCR, the Director-General of the Civil Aviation Authority of Thailand (DGCA) may, from time to time, issue Guidance Material (GM) on any aspect of safety in civil aviation. This GM contains information about standards, practices and procedures acceptable to CAAT. The revision number of the GM is indicated in parenthesis in the suffix of the GM number.

### 2. PURPOSE.

This GM is to provide guidance on aircraft tracking requirements for Thailand Air Operator Certificate (AOC) holders.

### 3. APPLICABILITY.

This GM applies to all Thailand AOC holders.

### 4. CANCELLATION.

None

### 5. REFERENCES.

Air Operator Certificate Requirements (AOCR), Chapter 2 Paragraph 30A

### 6. EFFECTIVE DATE.

This GM is effective from 30 April 2019.

### 7. DEFINITIONS.

**4D/15 Service.** In the provision of air traffic services an ATS unit receives four-dimensional (latitude, longitude, altitude, time) position information at 15 minutes intervals or less from suitably equipped aircraft.

**4D/15 Tracking.** The operator obtains four-dimensional (latitude, longitude, altitude, time) aircraft position information at 15 minutes intervals or less.

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## 8. BACKGROUND.

- 8.1 In the aftermath of the MH370 accident, CAAT carried out a review on how operators could enhance the tracking and locating of their aircraft, taking into account safety requirements, the available technologies and the work of International Civil Aviation Organisation (ICAO) in this area.
- 8.2 CAAT' policy to enhance aircraft tracking and locating by the operator was based on the three main components of Global Aeronautical Distress Support System (GADSS<sup>1</sup>): Aircraft Tracking, Autonomous Distress Tracking and Post Flight Localization and Recovery.
- 8.3 Consequently, the AOCR was amended on 31 March 2017 to requires Thailand operators to track their aircrafts during normal operations. Longer term GADSS components, i.e. Autonomous Distress Tracking (ADT) and Post Flight Localization and Recovery are being addressed separately.

## 9. REGULATORY REQUIREMENTS.

- 9.1 Aircraft tracking, as one of the key components of the ICAO GADSS, is to provide for the timely identification and location of an aircraft in event of an accident.
- 9.2 Paragraph 30A of Chapter 2 of the AOCR contains the requirements regarding tracking of aircraft during normal operations. For ease of reference, these are reproduced below:

### - 30A Aircraft Tracking

30A.1 An operator shall, on or after 8 November 2018, track the position of each of his aeroplanes that has:

- (a) A maximum certificated take-off mass of more than 45,500 kg; and
- (b) In the case of an aeroplane with a maximum certificated take-off mass of more than 27,000 kg but not more than 45,000 kg, a passenger seating capacity of more than 19 passengers.

*at least once every 15 minutes while that aircraft is in flight, in the manner specified in paragraph 30A.2, except where the aeroplane's position is able to be tracked by an ATS unit that is responsible for providing air traffic service for the aeroplane at the relevant time at least once every 15 minutes.*

<sup>1</sup> GADSS is a Concept of Operations (CONOPS) developed by ICAO Ad-hoc Working Group (AHWG) to address aircraft tracking and locating during all phases of flight by all relevant parties. The GADSS has condensed Aircraft Tracking – Normal Operations and Aircraft Tracking – Abnormal Operations into a single component – Aircraft Tracking.

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30A.2 *The aircraft tracking capability referred to in paragraph 30A.1:*

- (a) *shall, on or after 8 November 2018, make use of automated reporting; and*
- (b) *shall not make use of voice reporting through High Frequency (HF) radio.*

30A.3 *In the event that a particular aeroplane or flight cannot be tracked in accordance with paragraphs 30A.1 and 30A.2 due to temporary operational constraints, the operator may continue to operate that aeroplane or flight provided that*

- (a) *appropriate mitigating measures are in place for locating the aeroplane when needed;*
- (b) *he makes a report of the non-tracking situation to the Chief Executive within 72 hours after the termination of the affected flight; and*
- (c) *the procedures to monitor aeroplanes that could not be tracked have been incorporated into the Operations Manual.*

30A.4 *The operator shall establish, in his Operations Manual, procedures for the retention of aircraft tracking data to assist in determining the last known position of the aircraft as necessary.*

9.3 Further explanation on the aircraft tracking requirements are as follows:

- (a) Applicability. The requirements are applicable to an operator that operate any of the following:
  - (i) An aeroplane, regardless of passenger or cargo, that has a maximum certificated take-off mass of more than 45,500 kg; or
  - (ii) A passenger aeroplane that have a maximum certificated take-off mass of more than 27,000 kg and a passenger seating capacity of more than 19 passengers.
- (b) Tracking Capability. The aircraft tracking system shall be capable of 4D/15 Tracking, subject to the following conditions:
  - (i) Position report through HF voice is not allowed, as it has inherent limitations such as susceptibility to atmospheric interference and congestion of the airwave.
  - (ii) From 8 November 2018, only automated reporting is permitted. This means that the reporting of an aeroplane's location is done automatically via the aeroplane's data link, without the need for pilot action. Automated reporting reduces flight deck workload and will minimize any uncertainty in the accuracy of the report.
- (c) Areas of Coverage. The operator is to maintain 4D/15 Tracking of its aeroplanes throughout the entire duration of the flight, except where there is an Air Traffic Services (ATS) unit doing so. Having confirmed that the

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ATS is providing this 4D/15 Service, the operator does not need to independently track its aeroplanes.

*Note: ICAO has encouraged Air Navigation Service Provider (ANSP) to publish, in the Aeronautical Information Publication (AIP), current information on all systems used by ATS units to receive aircraft position information and their associated coverage areas. Accordingly, operator can determine the 4D/15 Service areas based on the published ATS systems (e.g. radar, Automatic Dependent Surveillance – Broadcast (ADS-B), Automatic Dependent Surveillance – Contract (ADS-C), etc.) and their associated coverage areas and operating times.*

- (d) Retention of Tracking Data. The operator is to retain 4D/15 Tracking data for the purpose of assisting search and rescue entities in determining the last known position of the flight. Unless there is an accident, there is no need to retain tracking data after the aeroplane has landed safely.

## 10. AIRCRAFT TRACKING POLICY, PROCESS AND PROCEDURE

10.1 To achieve sufficient organizational control over aircraft tracking activities, the operator should:

- Establish an aircraft tracking policy;
- Address ground based and airborne tracking requirements and capabilities;
- Establish and document all applicable policies, processes and procedures, including policies and procedures for third parties that perform aircraft tracking activities on the operator's behalf;
- Allocate appropriate resources;
- Establish appropriate tasking of operational personnel; and
- Train all applicable personnel

10.2 In order to practically fulfil its aircraft tracking responsibilities, the operator would need to analyze its routes to determine which will be reliant on 4D/15 Service and which will require 4D/15 Tracking. For areas whereby the availability of 4D/15 Service cannot be determined, the operator will be responsible to track its aeroplanes. Therefore, the operator should have specific policies and procedures that:

- Identify the duties, tasks and actions necessary to track a specific flight;
- Ensure the duties, tasks and actions related to the tracking of each flight are assigned to the appropriate personnel; Ensure planned routes are reviewed to determine whether or not a 4D/15 Service is available along an intended route;
- Ensure aircraft equipage matches the 4D/15 Service in use;

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- Identify the areas, routes or route segments when 4D/15 Tracking is required; and
- Implement appropriate mitigating measures for areas or routes where 4D/15 Service and 4D/15 Tracking are not available due to operational constraints (refer to paragraph 11).

## 11. TEMPORARY OPERATIONAL CONSTRAINTS.

11.1 Possible Scenarios. It is noted there would be operational situations whereby aircraft tracking might not be practically achieved for a particular flight or route. Some examples are:

- **Aircraft equipment failure at dispatch** – Aircraft tracking equipment (e.g. Satellite Communications (SATCOM)) could fail during pre-departure, rendering total or partial loss of tracking capability.
- **Outage of communications service providers / ground equipment / ground system** – Scheduled maintenance or unforeseen interruption of satellite network, Very High Frequency (VHF) station, ground systems could cause temporary loss of tracking.
- **Re-routing of flights** – Flight which was originally routed over areas where 4D/15 Service was available, might need to be re-routed over certain areas whereby 4D/15 Service is not available due to various reasons such as airspace closure, volcanic ash, security issues, etc.
- **Re-deployment of aircraft** – Due to operational or technical reasons, an aeroplane originally deployed only for routes over areas where 4D/15 Service is available, might need to be re-deployed to routes over areas whereby 4D/15 Service is not available at all times.
- **Operations over polar regions** – There might be temporary loss of tracking over the polar regions of aeroplanes due to limitations of the satellite network.

In these situations, the operator may continue to operate the affected aeroplane or flight provided risk assessment is conducted and the dispatch is done in accordance with pre-approved procedures.

11.2 Risk Assessment Process. Paragraph 30A.3 of Chapter 2 of the AOCR provides for the operator to continue operations in situation where the required tracking is not available provided certain conditions are met. In order to determine the appropriate level of mitigating measures required, operator should establish a risk assessment process to identify any hazards and risks associated with a lack of tracking. It should be noted that the intent is not to conduct a specific risk assessment on a tactical basis by operational personnel and/or the flight crew. Rather, the risk assessment process would be used by the operator to develop mitigations that would be imbedded in policy and

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procedures that would in turn allow for flight dispatch in accordance with the outcome of the process. The risk assessment process should consider at least the following elements:

- Capability of the operator's system and processes** – The demonstrable capabilities of the operator's ground-based systems and processes should be assessed. This would include the tracking capability to determine the position of an aircraft based on any available data sources, the flight monitoring capability of the ground based systems to detect and resolve missed position reports, the appropriate training of relevant personnel to cope with lapses in 4D/15 Tracking, and any other ground based system that aids in the timely resolution of missed reports.
- Capability of the aeroplane's tracking and locating systems** – The equipment of the aeroplane to support position reporting (e.g. Aircraft Communications Addressing and Reporting System (ACARS, ADS-B, ADS-C, SATCOM / VHF / HF, Engine condition monitoring system, etc.) should be assessed to determine the available (remaining) tracking capability. Also, capabilities of locating technologies (e.g. Emergency Locator Transmitter (ELT), Underwater Locating Device (ULD), etc.) should be fully assessed in the context of planned areas of operations to determine the aeroplane location capabilities afforded by such technologies. Lastly, the available communication technologies (e.g. VHF, HF, SATCOM, SATVOICE, etc.) should be considered as well.

*Note: Unserviceable aircraft system(s) with aircraft tracking implications may not be immediately obvious (e.g. ELT inoperative) and should be identified in the MEL or other operational documentation.*

- Available means to determine the position of and communicate with the aircraft** – The demonstrable capability of an operator to rapidly and reliably communicate with an aircraft. The capabilities available to support aircraft/operator/ATS communications and surveillance should also be assessed (e.g. to support/update ground based tracking, resolve missed position reports, determine flight status, etc). ANSPs may have access to surveillance information beyond the range of VHF communications which could be used to monitor flights.
- Frequency and duration of gaps in 4D/15 Tracking capability** – The exposure of a given operation or series of operations to gaps in 4D/15 Service or 4D/15 Tracking, and consequently the likelihood that an undesirable outcome might occur during such gaps considering the number of planned flights, the length of each flight and the duration of the gap(s). This may affect the need for mitigation strategies and would also help in quantifying the risk associated to exempting flights from tracking.

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- **Specific mitigation measures and contingency procedures** – The risk management mitigation strategies based on an assessment of relevant hazards, their probability and severity of the consequences that may adversely affect a planned operation; as well as the contingency procedures for use by operational personnel and flight crew that address the gaps and optimise remaining capabilities for aircraft tracking.
- **Human factors consequences resulting from changes to flight crew procedures** – The impact on flight crew workload, from a human factors perspective, of any existing or proposed procedures implemented to mitigate the risk associated with gaps in 4D/15 Service or 4D/15 Tracking. For example, manual reporting should be avoided as a viable mitigation strategy as the additional workload required to meet 4D/15 Tracking requirements would distract the flight crew from other operational duties and have a negative impact on the safety of the operation.

The above considerations ensure risk assessment activities are sufficiently robust to quantify the risk associated with a lack of 4D/15 Tracking. They also ensure an operator's aircraft tracking capability can be critically assessed to determine if existing risk controls and mitigations are sufficient or if additional mitigation is required.

*Note: The operator can refer to **Appendix A** for a sample risk assessment process and scenario. The operator can also make use of their existing risk assessment process for aircraft tracking purposes.*

11.3 Reporting to CAAT. As per Paragraph 30A.3 of Chapter 2 of the AOCR, when a non-tracking situation of 4D/15 occurred, the operator is required to make a report of the situation within 72 hours after the termination of the affected flight. This written notification should contain the following details, and be submitted to CAAT via email through caataoc@caat.or.th

- Airline, Aircraft Type, Aircraft Registration, Flight Number, Sector
- Date, Time
- Affected area(s)
- Brief description of the reason(s) for the non-tracking situation

11.4 Procedures. Operator procedures for allowing the continuation of a flight when 4D/15 Tracking and 4D/15 Service were not available must be approved by CAAT. It should be incorporated in the Operations Manual, or other operational manuals with references made to the Operations Manual. The procedures should describe:

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- The risk assessment process for carrying out planned operations with a known 4D/15 Tracking deficiency
- Appropriate tasking of personnel with the necessary knowledge or expertise to participate in risk assessment activities
- Risk elements that should be considered during risk assessment in accordance with paragraph 11.2
- The methodology for determination of the risk level and risk acceptability
- Implementation of the risk mitigation strategies

## 12. AIRCRAFT TRACKING DURING ABNORMAL OPERATIONS.

12.1 Using existing aircraft tracking systems, technologies and related resources, the operator could expand its flight monitoring capabilities to identify and monitor more closely a flight that is experiencing an abnormal event. The operator may identify an event as abnormal if the event has the potential to develop into a condition of distress which could be in the interest of the operator to monitor.

12.2 An operator that tracks abnormal events should clearly define the criterion that qualifies an event as abnormal so as to reduce false alerts. Abnormal events should include the following:

- Lateral deviation of 100 NM from the flight plan position
- Vertical deviation of 10,000 feet from flight plan altitude
- Initiation of emergency or distress calls by the pilot to airline operations centre
- Receipt of immediate or projected safety and/or security threats against the flight (e.g. sabotage threat, operations in conflict zones, etc.)

In addition, the operator may stipulate other occurrences that have potential significant safety implications as abnormal events. These include engine failure, ground proximity warning, cabin altitude warning, fire or smoke warning, reversion of flight control modes to direct law or direct mode, or any event that will be considered a reportable occurrence in accordance to Appendix Q in the AOCR.

12.3 When a flight experiences an abnormal event, the automated position reporting interval should be shortened to once every minute or less, i.e. 4D/15. The purpose is to provide the relevant ATS units with the most practicably available position data should an escalation to an emergency phase occur. At the same time, the operator should establish communication with the flight by any available means to determine its operational status, failing which the operator should notify the appropriate ATS unit with the latest known position of the aeroplane and its expected track. When the abnormal event is resolved, the automated position reporting interval may revert to once every 15 minutes or less, i.e. 4D/15.



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- 12.4 An abnormal event that may not be a mandatory reportable occurrence should also be reported to CAAT through the (flightreport@caat.or.th)

### 13. ALERTING PROCESS FOR MISSED POSITION REPORT

- 13.1 The operator must establish a process to monitor its flights throughout their entire duration when under 4D/15 Tracking. In the event of a missed position report, the operator should assess and determine whether it is the result of a system outage, equipment failure or other causes. The flight operations personnel or flight dispatcher, in conjunction with the operator's method of control and supervision of flight operations, should verify the relevant communication links and attempt to establish communication with the aeroplane by any available means. When such attempts are unsuccessful, the appropriate ATS unit should be notified in the most expeditious manner with the latest known position of the aeroplane and its expected track.

*Note: While works are underway at ICAO to standardise how an operator should inform an ATS unit of a missed position report, there are provisions currently in ICAO Annex 11 for ATS units to coordinate with the operator in event of such unforeseen circumstances.*

- 13.2 Missed position report that occurs within 4D/15 Service areas need not be alerted to the relevant ATS unit.
- 13.3 When a missed position report is resolved by the operator and/or ATS unit and contact is re-established, the operator should reset and resume 4D/15 Tracking. It is important to clearly identify the reset point so as to avoid the unnecessary initiation of missed report procedures.

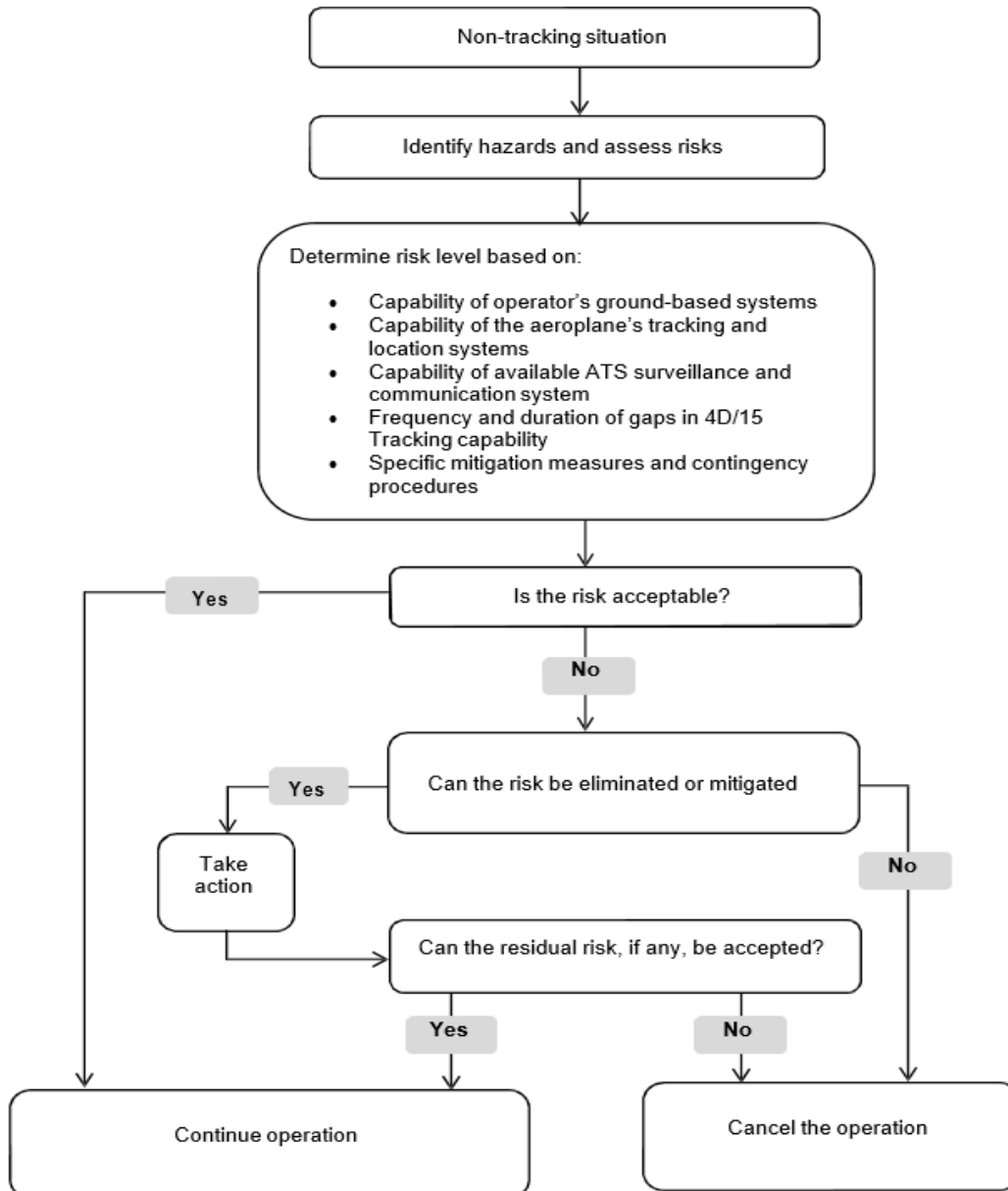
### 14. CONTACT PERSON AND INFORMATION

- 14.1 Should you have any queries relating to the above, please contact us at caataoc@caat.or.th

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**APPENDIX A**

**Sample Risk Assessment Process – Flowchart**



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**Sample Risk Mitigation Worksheet – Sample Scenario (Continue operation without additional mitigation)**

A Non-tracking Event	Identified Hazard	Projected Risk	Risk Level	Additional Mitigation Actions	Resultant Risk Level
Loss of SATCOM. SATCOM was found inoperative during pre-departure. Aircraft(HS-XXX) was scheduled for AAA-BBB sector.	Loss of 4D/15 Tracking for up to 30 minutes over ZZZ Sea.	Loss of communications during the non-tracking duration could result in delayed search and rescue operations in times of distress.	6 – Acceptable (See table below for details)	Nil	6-Acceptable
Item	Assessment Elements	Existing System/ Mitigations			Risk Level
1	Capability of operator's ground-based systems	Operator utilizes ABC ground based system – a highly reliable and accurate tracking system, with automatic alerting functions. Adequate number of trained flight operations personnel is available to monitor the flights.			1
2	Capability of the aeroplane's tracking and location systems	In absence of SATCOM, aircraft is capable of reporting its position through ADS-B (out), ACARS via VHF and waypoint reporting via HF voice (if required by ATC). Aircraft is also equipped with two automatic 121.5/406 MHz ELTs, and two 90-day 37.5kHz ULDs. (Functional check was done at every pre-departure). (MEL allows SATCOM to be inoperative, except for flight departing from SIN and provided the stated operational procedures are used.)			2
3	Available means to determine the position of and communicate with the aircraft	The portion of flight over ZZZ sea is under XYZ air traffic control which uses SSR, ADS-B, ADS-C for surveillance. XYZ air traffic control has an established process to track the aircraft via HF voice at certain waypoints during the non-tracking duration. Operator can also communicate with the aircraft through its service provider, when it is within HF/VHF range.			1
4	Frequency and duration of gaps in 4D/15 Tracking capability	30 minutes gap over ZZZ sea. Risk exposure is 10%. (30 minutes gap over entire flight duration of 5 hours)			1
5	Specific mitigation measures and contingency procedures	Operator has an established contingency process for ground crew to contact the aircraft and coordinate with the relevant ATS units. Flight crew procedures during distress situation were also well established. The subject flight will be flying over the ZZZ sea on an established airway, where there is frequent activity.			1
<b>Overall Risk Level - 6 (Acceptable)</b>					