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Statens haverikommission
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This document is a translation made by SHK of the original response in Swedish to the safety recommendation. In case of discrepancies between this translation and the Swedish original text, the Swedish text shall prevail in the interpretation of the response.

The Swedish Transport Agency's response regarding the recommendations in the report on the accident of 13 February 2015, involving an aircraft of the model Piper PA 46 Malibu, registration N164ST, which took place in Västerås (Björnö)

The Transport Agency hereby submits a response to SHK's assessment of how the Transport Agency has dealt with the recommendations issued by SHK in the report concerning the above event.

Recommendation to the Transport Agency:

Investigate the requirements for CCTV cameras for investigation purposes to be installed at Swedish commercial airports. (R1)

The Transport Agency's response to recommendation R1

The Transport Agency understands the reasons for issuing such a recommendation and agrees that in certain cases it would lead to greater possibilities for investigating how an accident or incident has occurred, using evidence in the form of images captured by surveillance cameras at airports. At the same time, the Transport Agency questions the efficacy of such a measure and whether the act of imposing such demands on airport operators is a part of the Transport Agency's mission and responsibilities.

The Transport Agency's instruction clarify that the agency's primary task is to take responsibility for issuing regulations, processing permit applications and conducting supervision in the transport sector, and it shall endeavour to ensure the transport policy goals are achieved.

The Transport Agency's operations shall be characterized by a special focus on contributing to a transport system which is internationally competitive, environmentally friendly and safe.

It is the Transport Agency's opinion that the installation of surveillance cameras with the intention of monitoring approaches to and take-offs from airports will have no direct impact on safety; rather, as per the report, the aim is to increase the potential for obtaining facts during investigations of accidents or incidents. In a more in-depth analysis and investigation, it is also doubtful as to whether the surveillance cameras would have a positive impact on accessibility or the environment.

The installation of cameras in Swedish airports entails a cost to the airport operators. Depending on the necessary level of performance for such surveillance cameras, it is difficult to foresee what the future costs might be. With experience from the work to examine the permit application for RTC (Remote Tower Center), the Transport Agency knows that the surveillance equipment for such operations is very costly. The cameras' coverage and the required range capabilities for film capture are other aspects which have a considerable impact on determining which equipment would be suitable and what the necessary scope of such equipment would be. The Transport Agency also predicts problems with the quality of the film material and questions how

satisfactory access to evidence would be feasible under conditions such as rain, snow or fog, which entail reduced visibility. The cameras' function in darkness is another aspect which the agency considers to be a limitation that constitutes a weakness in their usage, or which further increases the costs of equipment which is capable of filming in darkness.

After a more in-depth analysis, the Transport Agency has come to the conclusion that it will not take any further action on the grounds of the recommendation. The reason for this is that there are far too many limitations in the use of cameras and the Transport Agency is doubtful that surveillance cameras would be economically justifiable. The agency considers the limitations in the use of these cameras and the estimated costs that they would entail to outweigh the benefits, especially considering that the introduction of camera surveillance has only an indirect and limited impact on safety in the event of an investigation.

Recommendation to the Transport Agency:

To work for that the issue of operational CCTV cameras on commercial airports for investigation purposes, is appropriately addressed in the international flight safety. (R2)

The Transport Agency's response to recommendation R2

Due to the above response to R1, the Transport Agency has decided, following a more in-depth analysis, that it will not take any further measures based on the recommendation. The Transport Agency establishes that the recommendation presupposes that the investigation and analysis requested in R1 would lead to the conclusion that surveillance cameras are a good idea. This is not the conclusion at which the Transport Agency has arrived following analysis, and consequently the Transport Agency cannot work towards addressing the issue in the context of international flight safety.

Recommendation to the Transport Agency:

To tighten supervision regarding function and reliability in receiving emergency signals on frequency 121.5 MHz at air traffic control bodies in Swedish airports. (R3)

The Transport Agency's response to recommendation R3

Via supervision, the Transport Agency has detected shortcomings in coverage with regard to frequency 121.5 MHz and tightened up the regulations with the passing into force of the Swedish Transport Agency's regulations (TSFS 2015:51) and general advice for emergency services and air rescue services, as of 1 December 2015. To date, the requirement has only stated that an air traffic control unit must monitor frequency 121.5 MHz. Until now, the Transport Agency has presumed that in order for the monitoring to serve its purpose, the frequency must of course cover the relevant area. We have noted that this is not the case and have thereafter clarified the formulation of the regulations as follows:

Chapter 2: Preparatory measures for critical situations

Communication of emergency and urgent traffic messages

Section 14 An air traffic control unit must ensure two-way radio communication at 121.5 MHz within the controlled airspace, as well as traffic information zones and traffic information areas, in order to ensure the receipt and communication of emergency and urgent traffic messages.

The wording of the regulation clarifies responsibility and means that during inspection of an air traffic control unit or a supplier of air traffic services, the Transport Agency can ask to see evidence of how the permit holder ensures that the requirement is fulfilled. The requirement shall be applied from 2021. The Transport Agency will continuously monitor developments via supervision, whilst at the same time we are well aware that up to and including the year 2020, there will be shortcomings in the coverage, especially at long distances.

The decision-maker for the matter in question is Head of Unit Simon Posluk. Heads of Section Andreas Holmgren and Ann-Sofi Lorefält, as well as Accident Coordinator Britt-Marie Kärlin, assisted in the final administration of the case; the latter also acting as reporter.

[Signed]
Simon Posluk
Accident Chair