

Corrections and supplementary information – tender procedure for regional scheduled air services in Northern Norway for the period 1 April 2017 – 31 March 2022

Questions

Question 1:

"The routing shall correspond with flights to and from Oslo (or Tromsø)."

In previous tenders, it has been specified how many flights that should correspond with Oslo/Tromsø. Can the Ministry verify that the criteria as it is now formulated means that during the day there must be correspondence to Oslo/Tromsø in both directions, but it does not necessarily apply to all flights? Otherwise, it would necessitate a significant number of additional frequencies (beyond the PSO-requirement on frequencies) on some of the routes if the requirements of the timetable also imply that it is necessary to carry out flights that cannot correspond - a production increase which in turn will drive the compensation upwards.

Answer:

The Norwegian Ministry of Transport and Communications confirms that the criteria as it is now formulated in the Invitation to Tender Procedure means that during the day there must be correspondence to Oslo/Tromsø in both directions, but it does not necessarily apply to all flights.

Question 2:

How should "and/or" be interpreted in the text under section 4.2:

4.2 Technical and operational requirements

Tenderers are obliged to familiarise themselves with the technical and operational requirements that apply at the relevant airports. In accordance with «PBN Implementation Plan – Norway» Avinor is planning to implement satellite based instrument approach procedures (RNP-APCH) with LPV, and/or LNAV/VNAV, and/or LNAV minima for all instrument runway ends where this is practically possible, within 1 April 2017. See Section 5.5.1.2. More detailed information on this subject can be obtained from:

- The Norwegian Civil Aviation Authority (postmottak@caa.no, (+47) 75 58 50 00, contact person Ståle Rosland)
- Avinor (post@avinor.no, (+47) 815 30 550, contact person Alexander Løvar)

How should "and/or" be interpreted i.e. in the route area Andøya where LPV and LNAV approach are installed. Shall the air operator be able to use both LNAV and LPV approach? Or is LNAV adequate to comply with the criteria defined in 4.2?

Answer:

Satellite based instrument approach procedures with LPV, LNAV *and* LNAV/VNAV are implemented at Andøya airport. According to ICAO A.res. 37-11 and BSL G 4-1, LNAV/VNAV and LPV shall be used if they are implemented. LNAV shall *only be used* if LPV and LNAV/VNAV are not implemented. Thus, since LPV and LNAV/VNAV are implemented at Andøya airport, LNAV is not adequate to comply with the criteria defined in 4.2. This applies to all the airports there LNAV/VNAV or LPV are implemented.

See AIP Norway for more information about which procedure is applicable at each airport.

For more information contact Alexander Løvar in Avinor (post@avinor.no) or Ståle Rosland in Luftfartstilsynet (postmottak@caa.no)

Question 3

1. The Government has introduced tax on flights from Norwegian airports from 01.06.2016. At what tax rate should the tender be based on?
2. Which Avinor fees shall the tender be based on?
3. Is there a risk that the requirements for Norway Post to perform a certain amount of mail overnight (A record) disappears during the contract period, and that Norway Post as a result cannot be expected to use aircraft to the same extent as before?
4. Jet fuel is considerably more expensive at the small airports in the tender than for example in Oslo, because of transportation costs, etc. Does the government plan to equalize the differences?

Answer:

1. We assume here that the "tax on flights from Norwegian Airport" is the air passenger tax you are referring to. You can find the rates for this by following this link: <https://lovdata.no/dokument/SF/forskrift/2015-12-10-1461?q>. It is the Ministry of Finance that handles this tax, and questions can be directed to them. They can be contacted at postmottak@fin.dep.no.
2. Ref. section 5.10 on page 62 of Annex 2 in the Invitation to Tender Procedure "the operator shall conduct operations in compliance with the Aviation Act pertaining regulations...". In the link related to the issues under question 1 you will find regulations concerning Avinor fees for which operators shall comply with.

3. Ref. section 5.11 on page 62 of Annex 2 in the Invitation to Tender Procedure "the operator may be required to carry mailbags in return for compensation pursuant to the provisions of the Postal Service Act Section 16." Any changes to the contract that are material will be subject to renegotiation, ref. Section 9.1 of Annex 2 page 66. We ask you to base the tender on the regulations in force on the date of delivery of the tender.

For your information the Ministry of Transport and Communication has awarded the service obligation contract for newspaper distribution on Saturdays to Kvikkas AS. This means that Norway Post's obligation to ensure the delivery of subscription newspapers on Saturdays lapses from 1 November 2016, ref. Post's temporary obligation Section 9.1, ref. Section 10.1

Please refer to the white paper on changes in the postal sector (Meld. St. 31 (2015-2016)) and the government's proposal in terms of service for universal postal services. Parliament is planning to process the white paper in the fall session. The white paper is available online here:

<https://www.regjeringen.no/no/dokumenter/meld.-st.-31-20152016/id2499743/>

4. The tenderer should base its tender on the existing rules and practice at the date of the submission.

Question 4

The Invitation to Tender Procedure does not say anything about VAT. Can we assume that the tender can be delivered without taking into account VAT, i.e. net sums?

Answer:

The budget in Annex 4 of the invitation shall be entered in as a regular budget and the form in Annex 3 shall be based on the budgets. The compensation amount is the amount the provider will receive from the Ministry of Transport to cover costs and profits. Which cost provider includes in this amount is up to the provider. The important thing is that the provider does not expect that the government will cover VAT in addition to the compensation amount provider writes up. We will only transfer the amount of compensation listed in the tender to the winner (s) of the contest.

The tenderer shall not calculate VAT on the amount of compensation for PSO-routes in Annex 3.

Question 5

- 1) *What is the cabin factor in route area 2? The number does not appear in the table.*
- 2) *Is the cabin factor calculated using DHC8, i.e. 39 seats?*

Answer:

- 1) *Route area 2 is included in the route area called Finnmark in the table on page 82 in the invitation to tender procedure. Unfortunately this does not appear in the table. The Ministry received the information as published.*
- 2) *As we state on page 75 in annex 5 in the invitation to tender procedure, the information about cabin factors are received through reports from today's operator at the relevant route areas. The operator calculates the cabin factor by using the following formula: RPK/ASK (RPK = revenue passenger kilometre, ASK = available seat kilometre). The cabin factor is thus based on actual delivered capacity and actual flown revenue passenger. We would recommend you to read the report 1509 from Møreforsking and TØI Forslag til anbudsopplegg for regionale flyruter I Nord-Norge. At page 27 you will find information on the cabin factor for route area 2.*

Question 6

- 1) *Questions/comments to 5.5.1.2 regarding Trainingprogram*

Q to item i.

The tender requires 800 flight hours, this can be both «line» and other experience. As an example there are aeroclub pilots with 1000 hrs+ who do not necessarily have any knowledge of procedure-oriented lineflying. We can also recognize that SAS and other operators hire competent first officers as ab initio pilots.

Can there be other combinations, ie. pilots with training and theory of newer date and with 400 hours "on line" to be accepted as first officers?

Answer:

No, this is a minimum requirement that all tenderers must comply with.

It is not relevant to compare with SAS and Norwegian as they are running a totally different operation.

The Accident Investigation Board Norway (AIBN) has in several reports pointed out that the operational challenges on the short runway operations are far more demanding than operating scheduled air services to the traditional airports.

As an example, both Widerøe and Lufttransport (who both have decades of experience on these airports) have a lot stricter experience requirements than most other operators. This is based on many years of training experience of new candidates.

Experience shows that 800 hours should be the minimum number of flight hours before starting training for this type of operations.

Q to item ii.

vii. Flight Safety's ALAR course

Is there a specific reason for selecting Flight Safety as a provider for the ALAR course? There are several organizations that deliver this service. Can we select our training organization for the ALAR course as long as it covers all the requirements?

Answer:

This is unfortunately based on an error from CAA-Norway in the correspondence with the Department of Transportation.

It is supposed to be Flight Safety Foundation's (FSF) ALAR course. This was established after inputs from 190 operators in 1999, and prepared in cooperation with experts from FSF.

FSF is a global independent non-profit organization that collect statistics and facts from incident and accidents worldwide. The intention is to increase the understanding of the background for the accidents and propose improvements in training and operating procedures to increase the flight safety.

The ALAR course syllabus can be downloaded for free from FSF's homepage. The course is divided in two parts, where part one contains the generic recommendations regardless of A/C type and type of operations, and part two must be developed by the operator based on type of operation, type of A/C and experience.

The company is free to select ATO for the training, but the ALAR-course must be developed by the operator's training department and be described in OM-D.

Q to item ii.

viii. Areas of Operational Suitability Data (OSD), AFM and MEL that are relevant for STOL operations, the relationship between them and the consequences.

We ask the Dep. of Transportation to explain this requirement, in a way it is easy to understand.

Answer:

We refer to Reg. (EU) 965/2012 ORO.FC.145(b), which is a requirement for all operators (not only for short field operations).

OSD (operational suitability data) is a new EASA requirement for the aircraft manufacturers, where training and procedures for safe operation of the aircraft are described. These are divided into five categories:

- Training of pilots
- Master MEL
- Training of cabin crew
- Training of maintenance personnel
- Simulator requirements

The operator must develop training, procedures and policies for handling of MEL, regarding use of AFM, AFM supplements, performance restrictions as a result from the malfunction, what kind of malfunctions can be allowed on short fields vs normal runways etc.

These procedures, policies and performance restrictions must be prepared based on OSD, MMEL and AFM limitations and in addition customized the special relevant operational requirements for short field operations regarding terrain and weather.

ORO.FC.145 Provision of training

(a) All the training required in this Subpart shall be conducted:

(1) in accordance with the training programmes and syllabi established by the operator in the operations

manual;

(2) by appropriately qualified personnel. In the case of flight and flight simulation training and checking, the personnel providing the training and conducting the checks shall be qualified in accordance

with Annex I (Part-FCL) to Regulation (EU) No 1178/2011.

(b) When establishing the training programmes and syllabi, the operator shall include the relevant elements

defined in the mandatory part of the operational suitability data established in accordance with Regulation

(EU) No 748/2012.

(c) In the case of CAT operations, training and checking programmes, including syllabi and use of individual

flight simulation training devices (FSTDs), shall be approved by the competent authority.

(d) The FSTD shall replicate the aircraft used by the operator, as far as practicable. Differences between the

FSTD and the aircraft shall be described and addressed through a briefing or training, as appropriate.

(e) The operator shall establish a system to adequately monitor changes to the FSTD and to ensure that those changes do not affect the adequacy of the training programmes.

Q to item iii. Simulator training:

i. ZFTT type ratings not approved

Is this only valid for pilots to be trained after April 01st 2017? What about pilots who are already type-rated?

Answer:

This is a requirement for all pilots.

Airliners performed landing training without passengers earlier, even if this was expensive with large aircraft and the first landings was hard with wrong touchdown point.

Short field operations are different. Correct approach angle, speed and corrections are crucial for a safe landing. Landing short or long may in many cases end up as an accident.

Training of pilots should have a clear structure and be in phases with distinct objectives. Passing one phase should be a requirement to start training in the next phase. Experience shows that candidates that fail last phase needs additional training before linetraining with passengers.

Some of the additional training that is done today is initiated based on safety directives from AIBN after investigating landing accidents and incidents with inexperienced pilots.

CAA Norway's requirements are based on these directives and years of operational experience.

Pilots who are already type rated have done the required landings training earlier and need only to qualify or requalify on the CAT C airports (if necessary). This can be done during LIFUS with a line instructor or in a simulator.

ii. Simulator configuration must be as close as possible to actual configuration

We have previously received the following from CAA Norway:

FSTD used for training should be a copy of the operators aircraft. Differences shall be described and classified (required training) with regard to the level of difference in ATA chapters.

Is this also a requirement from Dep. Of Transportation?

Answer:

Yes, with reference to ORO.FC.145 (d and e) above.

FSTD should ideally be identical to the aircraft operated. However, this is not always possible to achieve. In these cases the operator must describe the differences and how the training can compensate for the differences.

What differences are acceptable depends on multiple factors. Are they cosmetic or are there large differences in systems. Are the systems operationally important/critical? What are the possibilities for alternative training, and what compensating actions have been taken by the operator? All these factors are important for CAA-N to evaluate and to approve the training.

For short field operations, a good visual system is important. In addition, FMS and visual presentation are considered as operational critical components.

Q to item iv. LIFUS (line instruction flying under supervision)

iv. Restrictions in minimum 300 hours + a winter season

This item is very unclear, and we request an explanation to this item. The requirements and items regarding restrictions are essential for a new operator's possibility to attend a tender area, and we ask you to consider these items carefully.

Below are some comments we hope can make the requirement more clear:

What is the meaning of the 300 hour restriction?

Answer:

The wind- and weather-restrictions shall apply for minimum 300 hours or during one winter-season. In the case that 300 hours is not obtained during one winter, the restriction can be lifted.

What is meant with operational restrictions? "Duty time limitations", wind limitations", or "visibility limitations"?

Answer:

This has nothing to do with duty time limits, only weather and wind.

What is a winter season?

Answer:

Winter season is from October 15th until April 30th.

Are the requirements for commanders or first officers?

Answer:

The requirements are valid both for new commanders and first officers. If the commander has no restrictions, but the first officer is still restricted, approach and landing can be done with the commander as pilot flying if the weather is restricting the first officer. The other way is not possible.

What restrictions are valid for pilots with previous short field experience for example Widerøe pilots who have this experience?

Answer:

These pilots must requalify on the CAT C airports, unless they have been there the last 12 months and this can be documented.

What about SAS and Norwegian pilots with have winter experience on B-737?

Answer:

These pilots will be restricted.

What if the pilot has been operating short field on Iceland/Greenland, what will be the restrictions for these pilots?

Answer:

These pilots will also be restricted, as the reason for the restriction also has an element of local knowledge to the different airports.

2) Question/comment 5.5.3, last paragraph «Progress Schedule»

Last sentence: The tenderer is encouraged to explain how the aspects at letters a) – s) will be dealt with, among other things.

We ask for an explanation to which item and paragraph it refers to?

Answer:

Here it is done a mistake in the references in the document.

The sentence on page 21 “The tenderer is encouraged to explain how the aspects at letters a) – s) will be dealt with, among other things” should read “The tenderer is encouraged to explain how the aspects at letters i) – xx) will be dealt with, among other things”.

Question 7

Traffic revenues is largely affected by the total product, distribution, sales/marketing and pricing. Avinor passenger statistics for 2012 and 2013 show double-digit percentual growth in traffic in the first year after Widerøe took over the routes on Florø respective Røros. The invitation to tender states that the traffic information are indicative, and new operators can thus consider that the exclusive rights involves little income risk. Will the Ministry emphasize that the tenders minimum requirements in relation to product, pricing, distribution etc. is not related to the guiding traffic information?

In Annex 5 to the tender page 75 "Traffic information" the Ministry stresses that the tenderers themselves are responsible for calculating revenues for the routes covered by the public service obligations, and that the traffic information is only intended for guidance. The Ministry further informs that the traffic information is obtained through reports from the operating airlines, and that information must be seen in accordance with the traffic programs and interline agreements for the said periods. This also applies to post and freight. The guiding traffic information is included in the tender documents to provide a picture of the market potential on the relevant route areas, but the possibilities for obtaining such traffic - and revenue will vary depending on the operator and other external and internal factors, as you mention

Tenderers must evaluate expected traffic levels and passenger revenue in light of the stipulated minimum requirements by route area in Annex 1.

Corrections

Correction 1:

The table in page 84 contains errors, and should be replaced by the correct table:

Route area	Load factor
Røst	43,6%
Andøya	47,9%
Finnmark	46,0%
Mo i Rana, Mosjøen	59,9%
Lakselv	53,5%
Nord-Trøndelag	61,0%
Svolvær, Leknes	59,6%
Harstad/Narvik	46,6%
Brønnøysund, Sandnessjøen	58,1%

Correction 2:

The sentence on page 21 in the rules for the tender procedure "The tender is encouraged to explain how the aspects at letters a) – s) will be dealt with, among other things" should be corrected to " The tender is encouraged to explain how the aspects at letters i. – xx. Will be dealt with, among other things".

Correction 3:

We have been informed about a miscalculation in annex 5 under traffic information. A number of tables are affected by this miscalculation, and these should be replaced by the following tables:

Route area 3, page 79

Number of passengers

	LKL	TOS	Sum:
LKL		25 310	25 310
TOS	24 444		24 444
Sum:	24 444	25 310	49 754

Passenger revenues

	LKL	TOS	Sum:
LKL		20 999 067	20 999 067

TOS	21 707 532		21 707 532
Sum:	21 707 532	20 999 067	42 706 599

Route area 6 and 7, page 80

Number of passengers

	BOO	LKN	SVJ	Sum:
BOO		46 337	34 696	81 033
LKN	51 670			51 670
SVJ	37 743			37 743
Sum:	89 413	46 337	34 696	170 446

Passenger revenues

	BOO	LKN	SVJ	Sum:
BOO		31 352 925	23 667 070	55 019 995
LKN	33 307 941			33 307 941
SVJ	25 105 653			25 105 653
Sum:	58 413 594	31 352 925	23 667 070	113 433 590

Route area 11 and 12, page 82

Number of passengers

	BOO	MJF	MQN	TRD	Sum:
BOO		6 938	22 563		29 501
MJF	7 393			22 707	30 100
MQN	22 618			26 462	49 080
TRD		23 523	27 699		51 222
Sum:	30 011	30 461	50 262	49 169	159 903

Passenger revenues

	BOO	MJF	MQN	TRD	Sum:
BOO		5 655 500	14 927 443		20 582 942
MJF	6 591 231			20 910 566	27 501 798
MQN	15 554 883			28 861 769	44 416 652
TRD		23 714 822	31 631 495		55 346 318
Sum:	22 146 114	29 370 322	46 558 938	49 772 335	147 847 710

Supplementary information

Supplementary information 1:

An additional information related to the table for Load factor on page 91 in the tender, is that a strike at Svolvær airport may have influenced the 2013-2014 figures somewhat.

Supplementary information 2:

AIC concerning the planned announcement of steep approach APV Baro-VNAV procedures are now available via the following link:

https://www.ippc.no/ippc_ais/aic_a/EN_Circ_2016_A_004_en.pdf