

# Operations in US Class A Airspace Without ATC Communications or ATC Surveillance

## INTRODUCTION

As part of its contingency planning for the closure of air traffic control facilities, also termed “ATC Zero” (ATC-0), the Federal Aviation Administration (FAA) is utilizing an airspace management strategy that allows operations during ATC-0 situations in Class A airspace.

The ATC-0 operations are conducted without the availability of air traffic control (ATC) services, including aircraft-to-aircraft separation, ATC surveillance, and air-to-ground communications with air traffic controllers at an ATC facility such as an Air Route Traffic Control Center (ARTCC). Flight crews will generally be on their own to maintain safety in ATC-0 airspace.

## INCLUDED

ALPA Safety Alert 2021-01, Operations in Class A Airspace Without ATC Communications or ATC Surveillance



# ALPA SAFETY ALERT

2021-01

## Operations in Class A Airspace Without ATC Communications or ATC Surveillance

As part of its contingency planning for the closure of air traffic control facilities, also termed “ATC Zero” (ATC-0), the Federal Aviation Administration (FAA) is utilizing an airspace management strategy that allows operations during ATC-0 situations in Class A airspace. The ATC-0 operations are conducted without the availability of air traffic control (ATC) services, including aircraft-to-aircraft separation, ATC surveillance, and air-to-ground communications with air traffic controllers at an ATC facility such as an Air Route Traffic Control Center (ARTCC). Flight crews will generally be on their own to maintain safety in ATC-0 airspace.

ATC-0 operations may be triggered by planned events such as cleaning of a facility following a viral outbreak or an unplanned evacuation of a facility due to a fire as occurred in the Chicago ARTCC in 2014.

Regardless of the triggering event, the ATC-0 operations allow access to the Class A airspace via the use of predefined routes published via NOTAMs, assigned through the use of ATC IFR clearances, and rely on the use of compulsory reporting points. Additionally, a procedure not familiar to many pilots that is contained in ICAO Annex 11, Traffic Information Broadcast by Aircraft (TIBA), is provided for use in the extensive NOTAM. Part 1 of a recent 4-part NOTAM rendering an ARTCC sector ATC-0 is provided below.

FDC 1/0433 ZJX PART 1 OF 4 FL..AIRSPACE NOTICE HILLIARD, FL..ATC SERVICES AT JACKSONVILLE ARTCC ARE TERMINATED FM 2101042120 TO 2101050020. FLT PLANNING THRU JACKSONVILLE ARTCC FIR ARE ADZ THAT AIR TFC SERVICES WILL NOT BE PROVIDED AND IFR OPS WI THE FIR WILL BE RESTRICTED. ALL IFR DEP FM WI JACKSONVILLE ARTCC FIR WILL BE STOPPED AT 2050. IFR ENTRY FM ADJ ATS PROVIDERS AND ARTCC FIRS WILL NOT BE ACCEPTED, EXC FOR THE FOLLOWING: OVER FLTS THRU JACKSONVILLE ARTCC FIR: NB IFR OPS BTN MIAMI ARTCC FIR AND ATLANTA ARTCC FIR VIA WAKKO Q77 TEUFL WIGVO AT AN ODD ALT. ONLY NON-SURVEILLANCE SEPARATION WILL BE PROVIDED BTN WAKKO AND WIGVO. NO ATC COM WILL BE AVBL BTN WAKKO AND TEUFL. TFC INFO BCST BY ACFT (TIBA) 135.45 BTN WAKKO AND TEUFL. SB IFR OPS BTN ATLANTA ARTCC FIR AND MIAMI ARTCC FIR VIA YUESS Q79 DOFFY Q79 MOLIE Q79 WULFF AT AN EVEN ALT. ONLY NON-SURVEILLANCE SEPARATION WILL BE PROVIDED BTN YUESS AND MOLIE. NO ATC COM WILL BE AVBL BTN YUESS AND 35NM N MOLIE. TFC INFO BCST BY ACFT (TIBA) 128.42 BTN YUESS AND 35NM N MOLIE.

The FAA has determined that the procedures described in the NOTAM are adequate to ensure appropriate safety levels. ALPA disagrees with the FAA and opposes continued use of the airspace for air carrier operations until the procedures are more fully defined and pilots receive proper training to ensure an adequate level of safety. Of particular note are ALPA concerns related to the following:

- Flight crews operating within ATC-0 airspace are required to accept responsibility for aircraft separation from ATC.
- There are aircraft operating in Class A airspace without TCAS, which compounds the increased risk for a Mid Air Collision (MAC) without ATC surveillance and communications.
- The FAA has not provided guidance, established minimum training requirements, or standardized procedures to pilots, other than those contained in NOTAMs.
  - There is inadequate guidance available for off-nominal events, such as a diversion around weather.
- Due to the unusual nature of operations in ATC-0 airspace, opportunities for exposure to situations where regulatory violations occur will likely increase.

Recognizing that scenarios exist where ATC-0 events will occur, a comprehensive set of contingency plans with defined and standardized procedures are needed to establish safe airspace operations in the impacted airspace area until normal ATC services are restored. ALPA urges pilots to avoid “ATC-0” airspace by flight planning around the airspace instead of accepting clearances that route them through the airspace.

If flight crews find that the only safe option available to them is to transit ATC-0 Class A airspace, pilots should:

- Work closely with their dispatchers to obtain a clearance through the airspace that minimizes risk.
- Jointly review the NOTAM procedures with your company dispatcher for operating in the designated airspace to ensure the safest operations possible.
- Review their company Flight Operations Manuals and Aircraft Flight Manuals for other relative procedures and how those may be affected by procedures contained in the NOTAM for the designated ATC-0 airspace. Procedures that would typically be unremarkable with all ATC services being provided, may become quite complicated and risky in ATC-0 airspace.
- Submit a ASAP/SMS safety reports for operations through ATC-0 airspace.

Please direct questions and concerns to Engineering and Air Safety at [eas@alpa.org](mailto:eas@alpa.org) or call (800) 424-2470.

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