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# INTRODUCTION.

* 1. This advisory memorandum outlines the process for submitting changes and material for publication in the Irish Aeronautical Information Publication (AIP). All changes/material shall be processed in accordance with this advisory memorandum.
	2. The material contained in this advisory memorandum has been developed to provide organisations that deliver services in support of air navigation with an understanding of the requirements of an Aeronautical Information Service (AIS), as well as for a Quality Management System.
	3. Management systems, including quality management provide the foundation for the distribution of aeronautical data and information, and which also contribute to satisfying the requirements for timeliness and accuracy of Regulation (EU) 2017/373, International Civil Aviation Organisation (ICAO) Annex 15 and other relevant Procedures.
	4. The AIS service provider ensures that aeronautical data and aeronautical information necessary for the safety, regularity and efficiency of air navigation are made available in a form suitable for the operational requirements of the aviation community.
	5. Readers should forward advice of errors, inconsistencies, or suggestions for improvement to this regulatory advisory memorandum to airspace@iaa.ie..

# REFERENCES.

* 1. The operation and maintenance of AIS in Ireland is subject to the following ICAO Standards and Recommended practices, EU Commission Regulations, and Irish guidance materials:
		1. ICAO Annex 15 - Aeronautical Information Services.
		2. ICAO DOC 8126 - Aeronautical Information Services Manual.
		3. ICAO DOC 10055 - Manual on Notification and Publication of Differences.
		4. ICAO Doc 10066 – Aeronautical Information Management.
		5. Commission Implementing Regulation (EU) 2017/373 of 1 March 2017 (as amended) laying down common requirements for providers of air traffic management/air navigation services and other air traffic management network functions and their oversight.
			1. Annex VI Specific Requirements for Providers of Aeronautical Information Services (Part-AIS)
	2. Commission Regulation (EU) No 139/2014 of 12 February 2014 laying down requirements and administrative procedures related to aerodromes pursuant to Regulation (EC) No 216/2008 of the European Parliament and of the Council
	3. The provision of AIS in Ireland is subject to initial Competent Authority certification and ongoing oversight in accordance with Regulation (EU) 2018/1139.
	4. ASAM 009 Guidance Material on Aeronautical Information Regulation and Control.
	5. ASAM 010 Guidance Material on Aeronautical Information Circulars (AIC).
	6. EUROCAE ED-76A/RTCA DO-200B ‘Standards for Processing Aeronautical Data’.

# Definitions.

* 1. ‘aeronautical data’ means a representation of aeronautical facts, concepts or instructions in a formalised manner suitable for communication, interpretation or processing;
	2. ‘aeronautical database’ means a collection of aeronautical data organised and arranged as a structured data set, stored electronically on systems, which is valid for a dedicated period and may be updated;
	3. ‘Authoritative source’ means:
		1. (a) a State authority: or
		2. (b) an organisation formally recognised by the State authority to originate and/or publish data which meets the data quality requirements (DQRs) as specified by that State;
	4. Aeronautical information management (AIM). The dynamic, integrated management of aeronautical information through the provision and exchange of quality-assured digital aeronautical data in collaboration with all parties.
	5. Aeronautical Information Circular (AIC): A notice containing information that does not qualify for the origination of a NOTAM or for inclusion in the AIP, but which relates to flight safety, air navigation, technical, administrative, or legislative matters.
	6. Aeronautical Information Publication (AIP): A publication issued by or with the authority of a State and containing aeronautical information of a lasting character essential to air navigation.
	7. ‘AIP amendment’ means a permanent change to the information contained in the AIP;
	8. ‘AIP supplement’ means a temporary change to the information contained in the AIP, which is provided by means of special pages;
	9. AIRAC: An acronym (aeronautical information regulation and control) signifying a system aimed at advance notification, based on common effective dates, of circumstances that necessitate significant changes in operating practices.
	10. ‘completeness’ means, in relation to data, the degree of confidence that all data needed to support the intended use is provided;
	11. ‘data quality’ means a degree or level of confidence that the provided data meets the user's data requirements in terms of accuracy, resolution, integrity (or equivalent assurance level), traceability, timeliness, completeness, and format;
	12. ‘data quality requirements (DQRs)’ means a specification of the characteristics of data (i.e. accuracy, resolution, integrity (or equivalent assurance level), traceability, timeliness, completeness and format) to ensure that the data is compatible with its intended use;
	13. ‘data accuracy’ means a degree of conformance between the estimated or measured value and the true value;
	14. ‘data integrity’ means a degree of assurance that aeronautical data and its value has not been lost or altered since the data origination or authorised amendment;
	15. ‘data origination’ means the creation of a new data item with its associated value, the modification of the value of an existing data item or the deletion of an existing data item;
	16. ‘data originator’ means an entity originating aeronautical data and aeronautical information, including ATM/ANS providers referred to in point (2) of Article 2 of Regulation (EU) 2017/373 and aerodromes defined in point (1)(e) of Article 2 of Regulation (EU) 2018/1139
	17. ‘confidence level’ means the probability that the true value of a parameter is within a certain interval around the estimate of its value;
	18. ‘entity originating aeronautical data and aeronautical information’ – means any public or private entity responsible for origination of aeronautical data and aeronautical information used as a source for aeronautical information products and services. These entities do not include ATM/ANS providers referred to in point (2) of Article 2 of Regulation (EU) 2017/373 and aerodromes defined in point (1)(e) of Article 2 of Regulation (EU) 2018/1139.
	19. ‘format’ means, in relation to data, a structure of data items, records and files arranged to meet standards, specifications or data quality requirements;
	20. NIL: When information has not been submitted by the AIRAC date, a NIL notification shall be distributed not later than one cycle before the AIRAC effective date concerned.
	21. NOTAM: A notice distributed by means of telecommunication containing information concerning the establishment, condition or change in any aeronautical facility, service, procedure or hazard, the timely knowledge of which is essential to personnel concerned with flight operations.
	22. ‘integrity classification’ means, in relation to aeronautical data, a classification based upon the potential risk resulting from the use of corrupted data, defining routine, essential and critical data;
	23. SNOWTAM. A special series NOTAM given in a standard format providing a surface condition report notifying the presence or cessation of hazardous conditions due to snow, ice, slush, frost, standing water or water associated with snow, slush, ice, or frost on the movement area.
	24. ‘validation’ means, in relation to data, the process of ensuring that data meets the requirements for the specified application or intended use;
	25. ‘verification’ means, in relation to data, the evaluation of the output of an aeronautical data process to ensure correctness and consistency with respect to the inputs and applicable data standards, rules and conventions used in that process

Note. Definitions are drawn from Regulation (EU) 2017/373, ICAO Annex 15 and ICAO Doc 10066

# Acronyms.

* 1. AIS: Aeronautical Information Services.
	2. AIM: Aeronautical information management.
	3. AIP: Aeronautical Information Publication.
	4. AO: Aerodrome Operator.
	5. ANSD: Air Navigation Services Division.
	6. EAD: European Aeronautical Information Database.
	7. ICAO: International Civil Aviation Organization.
	8. EU: European Union.
	9. CA: Competent Authority.
	10. DQR: Data Quality Requirement.

# Legal Framework

* 1. **National**

The IAA Act (1993) confers a number of functions to the IAA related to ICAO. This gives the IAA powers to give effect to the ICAO Annexes by way of secondary legislation and to take enforcement actions where appropriate.

The Air Navigation and Transport Act (ANTA) of 2022 establishes the Irish Air Navigation Service Company, which trades as Air Nav Ireland (ANI). The ANTA sets out that one of the objects of ANI is to provide air navigation services, which include the provision of aeronautical information services.

* 1. **European**

Ireland, as a member State of the European Union, is a signatory to the Treaty on the Functioning of the European Union, which provides for international law to be transposed into European Union Regulations that are directly applicable in Member States. This provides for a harmonised approach throughout the Union.

In this regard, the Regulation (EU) 2018/1139 of the European Parliament and Council and its implementing regulations, transpose the SARPs of ICAO Annex 15, thus alleviating the need for the IAA to do so through the provision of the IAA Act.

European Union legislation also establishes the principle of a competent authority (regulator) and a service provider, setting out clear and separate responsibilities for these entities. Competent authorities certify and conduct oversight of service providers, who in turn, take responsibility for the compliant provision of the service.

With regard to the provision of aeronautical information services, Commission Regulation (EU) 2017/373 sets out the requirements for the IAA as the competent authority and ANI as the aeronautical information services provider.

* 1. **ICAO**

ICAO Annex 15 requires that each contracting State:

* + 1. Shall ensure that the provision of aeronautical data and aeronautical information covers its own territory and those areas over the high seas for which it is responsible for the provision of air traffic services (ATS).
		2. Shall remain responsible for the aeronautical data and aeronautical information provided in accordance with ICAO Annex 15 5.4.1.1. Aeronautical data and aeronautical information provided for and on behalf of a State shall clearly indicate that they are provided under the authority of that State, irrespective of the format in which they are provided.
		3. Shall ensure that the aeronautical data and aeronautical information provided are of required quality.
		4. Shall ensure that formal arrangements are established between originators of aeronautical data and aeronautical information and the AIS in relation to the timely and complete provision of aeronautical data and aeronautical information.
		5. In Ireland, the State meets these responsibilities through the certification and oversight of an aeronautical information service provider. The provision of Regulation (EU) 2017/373, transposing the SARPS of Annex 15, mandates the aeronautical information service provider to have in place management systems that ensure the competence of the providers personal and that the accuracy, quality and integrity of data is maintained throughout the aeronautical information process. The competent authority conducts ongoing oversight of the certified service provider to ensure requirements are being met.

# Aeronautical Information Services

* 1. **Competent Authority**
		1. The IAA, as the Competent Authority for Ireland, has certified ANI as the provider of Aeronautical Information Services within the State
		2. Regulation (EU) 2017/373, ATM/ANS.AR. A.005 states that the competent authority shall
			1. exercise certification, oversight and enforcement tasks in respect of the application of the requirements applicable to service providers,
			2. monitor the safe provision of their services.
			3. verify that the applicable requirements are met.
	2. **Aeronautical Information Service Provider Requirements**
		1. Regulation (EU) 2017/373, ANNEX VI — Part-AIS, AIS.OR.100 states:

*An aeronautical information services (AIS) provider shall establish information management resources and processes that are adequate to ensure the timely collection, processing, storing, integration, exchange and delivery of quality- assured aeronautical data and aeronautical information within the ATM system.*

* + 1. *Regulation (EU) 2017/373, ANNEX VI — Part-AIS, AIS.OR.105*

*An AIS provider shall ensure the provision of aeronautical data and aeronautical information necessary for the safety, regularity and efficiency of air navigation.*

* + 1. *An AIS provider shall receive, collate or assemble, edit, format, publish, store and distribute aeronautical data and aeronautical information concerning the entire territory of a Member State as well as those areas over the high seas in which the Member State is responsible for the provision of air traffic services.*
		2. *An AIS provider shall ensure that aeronautical data and aeronautical information are available for:*

*(1) personnel involved in flight operations, including flight crews, flight planning, and flight simulators;*

*(2) ATS providers responsible for flight information service, and*

*(3) the services responsible for pre-flight information.*

* + 1. *An AIS provider shall provide 24-hour services for NOTAM origination and issuance in its area of responsibility and for pre-flight information needed in relation to route stages originating at the aerodrome/heliport in its area of responsibility.*
		2. *An AIS provider shall make available to other AIS providers aeronautical data and aeronautical information required by them.*
		3. *An AIS provider shall ensure that procedures are in place to assess and mitigate safety risks to aviation arising from data and information errors.*
		4. *An AIS provider shall clearly indicate that aeronautical data and aeronautical information provided for and on behalf of a Member State are provided under the authority of that Member State, irrespective of the format in which it is provided.*
		5. *Regulation (EU) 2017/373, ANNEX VI — Part-AIS, AIS.OR.200*

*An AIS provider shall ensure that:*

*(a) aeronautical data and aeronautical information are provided in accordance with the specifications laid down in the aeronautical data catalogue, specified in Appendix 1 to Annex III (Part-ATM/ANS.OR);*

*(b) data quality is maintained; and*

*(c) automation is applied to enable the processing and exchange of digital aeronautical data*

* + 1. *Regulation (EU) 2017/373, ANNEX VI — Part-AIS, AIS.OR.220*

*An AIS provider shall ensure that verification and validation techniques are employed so that the aeronautical data meets the associated data quality requirements (DQRs) specified in point AIS.TR.200.*

* + 1. *Regulation (EU) 2017/373, ANNEX VI — Part-AIS, AIS.OR.305*

*An AIS provider shall issue an AIP.*

* 1. **AIS Management System Requirements**
		1. Management system requirements shall be implemented and maintained encompassing all functions of an AIS, The execution of management systems shall be made demonstrable for each function stage as required by and Commission Regulation (EU) 2017/373.
		2. The AIS Management System should enable the AIS provider to
			1. demonstrate its ability to consistently provide products that meet customer and applicable regulatory requirements; and
			2. address customer satisfaction through the effective application of the system, including processes for continual improvement and the prevention of non-conformity.
			3. Have in place the necessary policies, processes, and procedures, including those for the use of metadata, to ensure and verify that aeronautical data is traceable throughout the aeronautical information data chain so as to allow any data anomalies or errors detected in use to be identified by root cause, corrected and communicated to affected users.
		3. The quality management system shall ensure that all the data in the AIP has been prepared in conformity with Commission Regulation (EU) 2017/373, Annex 15, ICAO Doc 8126 ‘Aeronautical Information Services Manual’ and ICAO Doc 10066 ‘Aeronautical Information Management’, as appropriate.
	2. **Formal Arrangements**
		1. The AIS service provider receives aeronautical data and information for publication in the AIP (including NOTAM) from, but not limited to the following organisations that provide services in support of the air navigation system:
			1. Survey.
			2. Airspace/Procedure Design.
			3. Aerodrome operators.
			4. CNS/telecommunication service organisations.
			5. Search and Rescue (SAR) Service.
			6. Air traffic service organisations.
			7. Air Navigation Service organisations.
			8. Meteorological organisations.
			9. Other AIS organisations.
			10. Customs, immigrations, conservation and health authorities.
			11. Defence organisations.
			12. State Data providers, other government departments and ministries; and
			13. Mapping Agencies
			14. Geological Data Providers.
			15. Geodetic Data providers.
			16. Satellite Data providers.
			17. Industry Data providers.
			18. Academic Data Providers.
			19. Obstacle Owners.
			20. Other States.
		2. The AIS service provider shall ensure that formal arrangements are established with:
			1. All parties transmitting data to them; and
			2. Other AIS service providers, when exchanging aeronautical data and aeronautical information with them.
		3. These formal arrangements will specify the change management process that parties transmitting data to the AIS must undertake to demonstrate that data meets requirements for publication, for example, entities certified in accordance with EU Regulations such as aerodromes and ANSPs are required to have management system which detail change management processes. For other entities, evidence of that the data has been subject to a quality management process will be required, for example, non-certified organisations need to provide assurance that data is accurate and verified.
		4. Formal arrangements should include the following minimum content:
			1. The aeronautical data to be provided;
			2. The data quality requirements (DQRs) for each data item supplied according to the aeronautical data catalogue;
			3. The method(s) for demonstrating that the data provided conforms with the specified requirements;
			4. The action to be taken in the event of discovery of a data error or inconsistency in any data provided;
			5. The following minimum criteria for notification of data changes:
				1. Criteria for determining the timeliness of data provision based on the operational or safety significance of the change;
				2. Any prior notice of expected changes; and
				3. The means to be adopted for notification;
			6. The party responsible for documenting data changes;
			7. Data exchange details such as format or format change processes;
			8. Any limitations on the use of data;
			9. Requirements for the production of data origination quality reports;
			10. Metadata requirements; and
			11. Contingency requirements concerning the continuity of data provision.
		5. Data shall be transmitted to the AIS service provider in accordance with these formal arrangements.
		6. Only data from Authoritative sources or from data originators with that have formal arrangements with the AIS may have their data published in the AIP.
	3. **Data Quality Management**
		1. An AIS service provider shall ensure that:
		2. Aeronautical data and aeronautical information are provided in accordance with the specifications laid down in the aeronautical data catalogue, specified in Regulation (EU) 2017/373 Appendix 1 to Annex III (Part-ATM/ANS.OR);
		3. Data quality is maintained; and
		4. Automation is applied to enable the processing and exchange of digital aeronautical data
		5. The accuracy of aeronautical data shall be as specified in the aeronautical data catalogue (‘data catalogue’), specified in Regulation (EU) 2017/373 Appendix 1 to Annex III (Part-ATM/ANS.OR).
		6. The resolution of aeronautical data shall be commensurate with the actual data accuracy.
		7. The integrity of aeronautical data shall be maintained. Based on the integrity classification specified in the data catalogue, procedures shall be put in place so that:
			1. for routine data, corruption is avoided throughout the processing of the data;
			2. for essential data, corruption does not occur at any stage of the entire process and additional processes are included, as needed, to address potential risks in the overall system architecture to further assure data integrity at this level;
			3. for critical data, corruption does not occur at any stage of the entire process and additional integrity assurance processes are included to fully mitigate the effects of faults identified by thorough analysis of the overall system architecture as potential data integrity risks.
		8. The traceability of aeronautical data shall be ensured.
		9. The timeliness of the aeronautical data shall be ensured, including any limits on the effective period of the data.
		10. The completeness of the aeronautical data shall be ensured.
		11. The format of delivered data shall be adequate to ensure that the data is interpreted in a manner that is consistent with its intended use.
	4. **Data Originator Responsibilities.**
		1. An Data originator is an entity that is accountable for data or information origination and is an authoritative source and has formal arrangements in place with the AIS, in accordance with this Regulation (EU) 2017/373 and this notice.
		2. In order to ensure the integrity of aeronautical information throughout the data chain, data originators, as the first link in the chain, need to be assigned responsibility for the aeronautical information and data provided to the AIS provider. Data originators need to nominate a person who is responsible for coordinating with the AIS provider to ensure the quality and accuracy of information provided to the AIS provider.
		3. The data originator shall have formal arrangements in place with AIS or the Service Provider entity to whom the data originator provides the aeronautical data.
		4. The data originator is also required to ensure that the information provided to the AIS provider is in the appropriate format specified in the EU Regulations ICAO Annexes and ICAO Standards.
		5. It is important that data originators review the information published in the AIP and on aeronautical charts on a regular basis to ensure the information is updated when necessary.
		6. The data originator can be an individual or a nominated office holder.
		7. The data originator shall notify the AIS provider when the responsible person changes.
		8. The data originator shall ensure that material to be issued as part of an aeronautical information product shall be subject to their change management process, to ensure that the data is thoroughly checked before it is submitted to the AIS, including competent authority approval for the change, as required. Formal arrangements with AIS should set out process and which change process are appropriate.
		9. The data originator shall review all final draft material received from the AIS service provider for accuracy before the document is published by the AIS service provider.
		10. The data originator shall ensure all additions, deletions, or modifications are made to all documents and related paragraphs and/or indexes that may be affected by the change/material.
	5. **Processing of Aeronautical Information.**
		1. The Aeronautical Information Service Provider shall introduce a register for the received aeronautical information. The following shall be indicated in the referred to register:
			1. The date and time for the receipt of aeronautical information.
			2. The name of the aeronautical information originator, given name and surname of the contact person.
			3. The part of the aeronautical information compilation, to which the submitted aeronautical information pertains to; and
			4. Each activity that is carried out with the aeronautical information after the receipt thereof and keep a change record of the processes carried out in preparing aeronautical information.
		2. The AIS service provider shall examine the received aeronautical information; update it if necessary and co-ordinate with the data originator. The supplied information should have been subject to the organisations change management processes, and regulatory approval if appropriate
		3. The AIS Service provider shall format in accordance with the format specified in the EU Regulations, ICAO Standards, Recommended Practices and Procedures. Including ICAO Doc 8126.
		4. The AIS service provider shall maintain aeronautical information submitted in accordance with their regulatory requirements.
	6. **Co-ordination and Distribution of Aeronautical Information.**

There are two main phases to publishing data in the AIP.

* + 1. Change Management Phase
			1. Material to be issued as part of an aeronautical information product shall be subject to the entities change management process, to ensure that the data is thoroughly checked before it is submitted to the AIS, including Competent Authority approval for the change, as required. Formal arrangements with AIS should set out this process and which organisational change management processes are appropriate.
			2. If the level of change is such that competent authority approval is not required, then at a minimum, the entity proposing the change will notify the appropriate division in the competent authority (see appendix 1)
			3. All charts require approval by the competent authority. This approval should be sought as part of the entity’s change management process.
			4. The entity’s change management process shall include evidence that the data quality requirements (DQRs) for each data item are supplied according to the aeronautical data catalogue
	1. **AIS Processing Stage**
		1. The data originator must supply each data item in line with their formal arrangements with the AIS service provider.
		2. The data originator and the AIS service provider must ensure that the aeronautical data and aeronautical information is in compliance with Aeronautical data catalogue requirements.
		3. The AIS service provider checks the submission to ensure that it is in line with the formal arrangements and has successfully gone through the change management process, including competent authority engagement.
		4. The AIS service provider must format the submission in line with regulatory requirements.
		5. The AIS service provider coordinates the draft formatted submission with the data originator in line with their formal arrangements.
		6. The AIS service provider must submit the draft submission to the AIS competent authority for a review of formatting etc.
		7. The submission then enters into the AIRAC cycle
	2. **AIRAC Schedule**
		1. Refer to ASAM 009 Guidance Material on Aeronautical Information Regulation and Control (AIRAC) specifically Schedule of AIRAC Significant Dates and AIS Sign-Off Date.
	3. **Correction of Errors in Published Information.**
		1. If an error is determined to be hazardous or have the potential to be hazardous, remedial action appropriate to the operational significance of the error will be initiated by AIS service provider. The operational significance/hazardous nature of the error should be determined in consultation with the data originator.
		2. Appropriate action may include.
			1. Issue of NOTAM.
				1. If a NOTAM is issued, the error should be scheduled for correction in the next available scheduled AIP amendment. If the next available scheduled amendment will not be within 90 days, the information should be published by AIP Supplement at the next available issue.
			2. Issue of an AIP amendment at next available amendment; and
		3. To ensure continuous quality improvement, procedures need to be in place to record and analyse errors and implement both corrective action and preventative action.
		4. For the purposes of recording and analysis, an error is defined as follows:
			1. Any instance where information is incorrectly or inaccurately published; and
			2. Any instance where the accuracy, structure or format of published information does not conform with required standards.
		5. Attention should be given to whether an occurrence has created or had the potential to create a hazard. If it cannot be determined whether an error could or could not have been hazardous, the error should be recorded. For instance, there is probably little to gain from recording and analysing minor typographical errors.
		6. The formal arrangement between the AIS service provider and stakeholders will address error management.
	4. **Notification of ICAO differences**
		1. Article 38 of the Convention on International Civil Aviation (“Convention”) requires that a Contracting State notify ICAO any time it does not comply with a Standard in all respects, it does not bring its regulations or practices into full accord with any Standard, or it adopts regulations or practices differing in any respect from the Standard.
		2. The primary purpose of the notification of differences is to promote safety, regularity, and efficiency in air navigation by ensuring that governmental and other agencies, including operators and service providers, concerned with international civil aviation are made aware of all national regulations and practices in so far as they differ from those prescribed in the Standards contained in Annexes to the Convention.
		3. The competent authority will manage ICAO differences and arrange for notification of such.

***Appendix 2 :* *Overview of AIP Submission Proce***

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