

	<p style="text-align: center;">Aeronautical Services</p> <p style="text-align: center;">Advisory Memorandum</p> <p style="text-align: center;">(ASAM)</p> <p style="text-align: center;">Focal Point: ANSP</p>	<p style="text-align: center;">ASAM</p> <p style="text-align: center;">No: 052</p> <p style="text-align: center;">Issue 1</p> <p style="text-align: center;">Date: 27/01/2026</p>
<p style="text-align: center;">Title</p>	<p>Guidelines for ATM/ANS service providers when notifying the Competent Authority of a proposed Alternative Means of Compliance (AltMoC) to EASA AMCs in relation to Regulation (EU) 2018/1139 and its delegated/implementing rules.</p>	

1.0 Purpose

The purpose of this ASAM is to provide ATM/ANS service providers with guidance on submitting an Alternative Means of Compliance (AltMoC) application to the competent authority (CA) for evaluation and subsequent approval or rejection.

This ensures that:

- All AltMoC proposal documentation received from an ATM/ANS service provider, are evaluated in a consistent manner.
- Approved AltMoCs comply with Regulation (EU) 2018/1139 and its delegated/implementing rules.
- Approved AltMoCs may be used by the service provider to demonstrate compliance with Regulation (EU) 2018/1139 delegated/implementing rules.
- Allows for the competent authority to comply with its requirement to inform EASA of any approved AltMoCs used by ATM/ANS providers.

2.0 References

- Regulation (EU) No 2018/1139 as amended.
- Regulation (EU) 2017/373 as amended.

3.0 Scope

The information in this document applies to all ATM/ANS service providers in relation to Regulation (EU) 2018/1139 and its delegated/implementing rules.

In accordance with Regulation (EU) 2017/373, an alternative means of compliance with Regulation 2018/1139 and its delegated/implementing rules can be proposed by the ATM/ANS service providers, as an alternative to an existing Implementing Rule Acceptable Means of Compliance (AMC) that has been adopted by EASA.

4.0 Procedure

Regulation (EU) 2017/373; point ATM/ANS.OR.A.020 contains provision for an ATM/ANS service provider to use an AltMoC, subject to notification and prior approval by the competent authority.

Since regulation implementing rule AMCs are advisory and non-binding, an ATM/ANS service provider may propose an AltMoC, other than those established by EASA, as a means of demonstrating compliance with regulatory requirements. In such cases, the SP is responsible for documenting how the proposed AltMoC demonstrates compliance with the applicable requirements and achieves an equivalent acceptable level of safety to that provided by the existing AMC.

AltMoCs that have been approved by the authority, for use by the ATM/ANS service providers under its oversight, may only be used by other organisations if those AltMoCs are re-evaluated by their associated competent authorities.

5.0 Application for AltMoCs

If an ATM/ANS service provider wishes to establish an AltMoC for a specific requirement, it must submit at a minimum:

- A complete description of the proposed AltMoC,
- Revised procedures and/or manuals relevant to the AltMoC,
- A documented assessment demonstrating how the proposed AltMoC complies with all applicable elements and objectives of the specific requirement.
- A safety justification, commensurate with the nature and potential safety impact of the proposed AltMoC, demonstrating that an equivalent acceptable level of safety is achieved when compared to the AMC adopted by EASA. This justification may include a safety (support) assessment where appropriate and when deemed necessary by the competent authority;
- An acknowledgement that, if approved, the AltMoC will be notified by the CA to EASA, publicised to other member states and also available to other ATM/ANS service providers to use.

The service provider shall follow the application instructions at appendix 1 and complete the form at appendix 2. The completed form should then be submitted to the competent authority for consideration via email to ANSDInfo@iaa.ie.

An AltMoC may only propose an alternative means of achieving and demonstrating compliance with a regulatory requirement.

An AltMoC shall not:

- reduce, omit, or partially fulfil any element of the applicable requirement.

- be used to justify partial compliance (e.g. “in principle”, “in intent”, or “where practicable”, etc);
- substitute or dilute the requirement itself.

Any proposal that does not demonstrate compliance with all applicable elements of the associated requirement, shall not be accepted as an AltMoC and shall be treated as a non-compliance with the Regulation.

The evaluation of an AltMoC may require significant time if the service provider does not clearly demonstrate both the means by which compliance with the requirement is achieved and how the proposed AltMoC achieves an equivalent acceptable level of safety to the AMC adopted by EASA.

When the proposed AltMoC is necessary for the safety assurance related to changes in an SP’s management system, the CA may prioritise its evaluation ahead of other safety assurance documents, as expending resources and time on subsequent documentation would prove inefficient should the AltMoC be found to be insufficient to ensure compliance with the applicable regulatory requirement.

6.0 Evaluation of AltMoC Application

Upon receiving an AltMoC proposal, the CA shall ensure that all documentation required under section 5.0 has been received and that the application form has been completed i.a.w the published instructions (see Appendix 1).

If the application is deemed to be incomplete, the evaluation shall be suspended and the service provider requested to provide the additional information/documentation via an updated submission.

When the application is deemed to be complete, the CA shall carry out an evaluation of the submitted documentation, and if considered necessary, conduct an inspection of the service provider.

6.1 Approval of the proposed AltMoC

If following completion of the evaluation, it is determined that the proposed AltMoC satisfactorily demonstrates compliance with the applicable requirement(s) of the Regulation,

- The applicant is informed that the AltMoC can be implemented, and if necessary, their certificates are amended, and a timeline for updating the organisation’s documents is agreed.
- A copy of the approved AltMoC is provided to the IAA legal and compliance section i.a.w internal IAA procedures.
- IAA will notify EASA of the approved AltMoC without undue delay,

- Other Member States are informed that the AltMoC was approved i.a.w AMC1 ATM/ANS.AR.A.015(d)(3), by publishing the required information on the authority's website.

6.2 Rejection of the proposed AltMoC

If following completion of the evaluation, it is determined that the proposed AltMoC does not satisfactorily demonstrate compliance with the application requirement(s) of the Regulation, the service provider shall be informed that the submission has been rejected and a summary of the issues identified provided.

7.0 Notification to EASA

EASA shall be notified of the approved AltMoC without undue delay. This task is undertaken and managed by IAA legal and compliance section i.a.w internal IAA procedures.

8.0 Revocation of an AltMoC

If the authority decides to revoke an AltMoC, the Manager ANSD shall approve the revocation and ensure that IAA legal and compliance section is informed. All applicable ATM/ANS service providers shall be informed of this decision without undue delay.

Upon withdrawal, the AltMoC shall be removed from both the authority's website and the CA shall request its removal from the EASA AltMoC repository.

If EASA does not positively assess an AltMoC approved by the authority, the Manager ANSD, in consultation with the IAA Legal Advisor and Aviation Infrastructure Head of Function, shall promptly decide whether to revoke the AltMoC. All relevant stakeholders shall be informed of the authority's subsequent decision without undue delay.

Where an AltMoC is revoked, all service providers that implemented the revoked AltMoC shall take the necessary steps to re-establish the demonstration of compliance with the applicable requirements without undue delay and i.a.w their management system processes and procedures.

9.0 Publication on Website

AltMoCs approved by the CA must be made available to other aviation stakeholders on the authority's website. This is addressed at the following location on IAA website - [Alternative Means of Compliance \(AltMoC\)](#).

10.0 Continuous Validation of AltMoC

To verify whether an organisation's AltMoCs remain valid, follow-up is also conducted during ongoing oversight activities.

Appendix 1

AltMoC Application Instructions

Please complete the form at Appendix 2. The hereunder table lists the instructions for each point of information required.

1.0 Name of Service Provider	Insert the name of the ATM/ANS service provider as listed on their certificate
1.1 Proposed AltMoC focal point	Indicate the title, the name and the job title of the person in the SP to whom further communication on this proposed AltMoC should be addressed.
1.2 Contact details of the proposed AltMoC focal point	Include the email address and the telephone number of the proposed AltMoC focal point in the SP.
2.0 Subject	Outline the issue that the proposed AltMoC intends to address. Include if it's to be used for an upcoming SP change or introduction of new equipment or procedures.
2.1 Regulatory reference	Indicate the Regulation to which the proposed AltMoC refers (e.g. Regulation (EU) 2017/373).
2.2 Implementing rule (IR) paragraph(s)	Indicate the paragraph(s) of the implementing rule (IR) to which the proposed AltMoC refers to (ex: ATS.TR.230(a)).
2.3 Agency acceptable means of compliance (AMC) available	Indicate the existing AMC to the IR(s) refers to (e.g. AMC1 ATS.TR.230(a)).
2.4 Proposed AltMoC based on an AltMoC from another CA (No/Yes...)	Please indicate whether this proposed AltMoC is based on an AltMoC that has been approved by another CA and, if yes, indicate which CA.
2.5 Summary of the proposed AltMoC assessment	Summarise the proposed AltMoC and the assessment the SP performed, describing how it proposes to achieve compliance with the applicable requirement(s) and why the SP concluded that compliance is achieved by this proposed AltMoC.
2.6 List the titles of new or revised manuals, procedures with	Provide a list of revised procedures and/or manuals (drafts) relevant to the AltMoC,

<p>version numbers.</p>	
<p>2.7 Attachments to this proposed AltMoC application form</p>	<p>Tick in the relevant boxes to make sure you submit all the required documentation when notifying the CA of a proposed AltMoC.</p> <ul style="list-style-type: none"> <input type="checkbox"/> A complete description of the proposed AltMoC, <input type="checkbox"/> Revised procedures and/or manuals relevant to the AltMoC, <input type="checkbox"/> A documented assessment demonstrating how the proposed AltMoC complies with all applicable elements and objectives of the specific requirement. <input type="checkbox"/> A safety justification, commensurate with the nature and potential safety impact of the proposed AltMoC, demonstrating that an equivalent acceptable level of safety is achieved when compared to the AMC adopted by EASA. This justification may include a safety (support) assessment where appropriate and when deemed necessary by the competent authority; <input type="checkbox"/> An acknowledgement that, if approved, the AltMoC will be notified by the CA to EASA, publicised to other member states and also available to other ATM/ANS service providers to use.
<p>3.0 Date and signature</p>	<p>The form should be dated (dd/mm/yyyy) and signed by the AltMoC focal point indicated under 1.1. By signing the form, the SP's focal point confirms that all of the information provided in the AltMoC application form is correct and complete.</p> <p>The completed form should then be submitted to the CA for consideration via email to ANSInfo@iaa.ie.</p>

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Appendix 2

AltMoC application form

Please complete the application form hereunder. The instructions for each point of information required is listed at appendix 1.

1.0 Name of Service Provider	
1.1 Proposed AltMoC focal point	
1.2 Contact details of the proposed AltMoC focal point	
2.0 Subject	
2.1 Regulatory reference	
2.2 Implementing rule (IR) paragraph(s)	
2.3 Agency acceptable means of compliance (AMC) available	
2.4 Proposed AltMoC based on an AltMoC from another CA? (No/Yes...)	
2.5 Summary of the proposed AltMoC assessment	

<p>2.6 List the titles of new or revised manuals, procedures with version numbers.</p>	
<p>2.7 Attachments to this proposed AltMoC application form</p>	<p>Tick in the relevant boxes to make sure you submit all the required documentation when notifying the CA of a proposed AltMoC.</p> <ul style="list-style-type: none"> <input type="checkbox"/> A complete description of the proposed AltMoC in the safety assessment. <input type="checkbox"/> Revised procedures and/or manuals relevant to the AltMoC. <input type="checkbox"/> A documented assessment demonstrating how the proposed AltMoC complies with all applicable elements and objectives of the specific requirement. <input type="checkbox"/> A safety justification, commensurate with the nature and potential safety impact of the proposed AltMoC, demonstrating that an equivalent acceptable level of safety is achieved when compared to the AMC adopted by EASA. This justification may include a safety (support) assessment where appropriate and when deemed necessary by the competent authority.

	<input type="checkbox"/> An acknowledgement that, if approved, the AltMoC will be notified by the CA to EASA, publicised to other member states and also available to other ATM/ANS service providers to use.
3.0 Date and signature	

[End of document.]