



International Civil Aviation Organization

Middle East Regional Monitoring Agency Board

Nineteenth Meeting (MIDRMA Board/19)
(Manama, Bahrain, 10 – 11 October 2023)

Agenda Item 5: RVSM Monitoring and related Technical Issues

**STATUS REPORT ON THE MONITORING OF THE IRANIAN AND SYRIAN AIRCRAFT
(OFAC LICENSES)**

(Presented by the MIDRMA)

SUMMARY

This paper presents an update concerning of the MIDRMA concerning the application to the FAA and the US Department of Treasury regarding the OFAC license to use the EGMU equipment to monitor the Syrian and Iranian RVSM approved aircraft.

Action by the meeting is at paragraph 3.

REFERENCES

- MID- MID RVSM SMR 2022
- MIDRMA Board/18 Report
- MMR Table December 2023
- MIDRMA Auto MMR <https://midrma.com/en/monitoringResults>
- OFAC License for Monitoring Syrian RVSM Approved Aircraft (**Valid** Until 31st December 2024).
- OFAC License for Monitoring Iranian RVSM Approved Aircraft (**Expired** 31st January 2023)

1. INTRODUCTION

1.1 The MIDRMA, with the support of MIDANPIRG, deems it imperative that the RVSM Minimum Monitoring Requirements (MMR) endorsed for global adoption by all ICAO Regional Monitoring Agencies (RMAs) serve as the foundational framework for implementing this requirement.

1.2 RVSM Height Monitoring serves as the method for assessing altitude-keeping performance of aircraft, a critical aspect for Air Traffic Control in ensuring safety amid reduced vertical separation minima. Unlike pressure altitude, the true altitude is not visible to pilots, ATC personnel, or other aircraft.

In EGMU RVSM Monitoring, it rigorously evaluates aircraft performance by sampling GPS-derived height/ altitude data, subsequently comparing it with the pressure altitude being maintained. When an aircraft operates within the predetermined safety threshold for altitude vertical error, it achieves RVSM Height Monitoring Compliance, making it eligible for approval by the national regulatory authority responsible for RVSM operations approval.

1.3 To meet the ICAO Annex 6 Part 1 related to height monitoring requirements, the MIDRMA has consistently coordinated with all MIDRMA Member States. This collaboration has resulted in the publication of their respective minimum monitoring requirements through the automated MMR system, which are made readily available on the MIDRMA website. This proactive approach ensures the continual accessibility of these requirements for the benefit of relevant MID Civil Aviation Authorities and airline operators.

1.4 Height monitoring is undeniably a critical safety concern, closely intertwined with the analyses conducted in the annual SMR. The absence of height monitoring equates to a lack of assurance in maintaining 1000 ft vertical separation. The Syrian Civil Aviation Authority (SCAA) has displayed a proactive and responsible approach to this matter, expressing readiness to carry out the necessary monitoring for all their RVSM approved aircraft in due time. Regrettably, due to the absence of an OFAC license, which constrains MIDRMA from executing height monitoring activities in line with the agreed purchase agreement for the EGMUs, MIDRMA was unable to fulfil this essential task.

1.5 Obtaining the OFAC license is a long-standing issue, and the complexity of the most recent renewal request made it even more challenging. Unfortunately, the MIDRMA is not in direct contact with OFAC, as the license request was initiated and followed up by the FAA's side.

2. DISCUSSION

2.1 MIDRMA Application for OFAC Licenses to Monitor the Syrian RVSM approved Aircraft.

2.1.1 Due to the recently escalating number of operations of the RVSM-approved aircraft registered by the Syrian Civil Aviation Authority within the ICAO Middle East Region, MIDRMA formally submitted a request over a year ago for an OFAC License to both the FAA and the US Department of Treasury. This license is sought for the purpose of conducting RVSM height monitoring using Enhanced GMU equipment. Successfully, this license application was recently approved and the MIDRMA granted a permission to use the EGMU equipment to monitor the Syrian RVSM approved aircraft.

2.1.2 Recently, the FAA representative achieved a significant milestone by successfully securing an OFAC license from the U.S. Department of the Treasury. This accomplishment comes after longstanding request to employ EGMU equipment for the purpose of height monitoring Syrian RVSM approved aircraft. It marks a highly positive step toward resolving the critical issue of height monitoring for Syrian RVSM-approved aircraft.

2.1.3 While this newly obtained license holds great promise in addressing our height monitoring needs, it to be noted that its impact on Syrian aircraft may be limited, due to the pro-active step by the Syrian Civil Aviation Authorities to ensure the timely monitoring of their registered aircraft by sending them to overfly HMUs (Height Monitoring Units) available in Europe to obtain height monitoring results. This pragmatic approach enabled the certificate holders to renew their RVSM Approvals without waiting for the OFAC license, the timing of which remained uncertain. Nevertheless, we express our profound gratitude to the FAA for their invaluable assistance and unwavering support in obtaining this license which is valid for two years.

2.2 *MIDRMA Application for OFAC Licenses to Monitor the Iranian RVSM approved Aircraft.*

2.2.1 The process of securing an OFAC License from the Department of the US Treasury, specifically for the utilization of EGMU Equipment to monitor the Iranian RVSM approved aircraft, was initiated in October 2021. It is important to note that by January 2021, the OFAC license had already received approval, and the request for its renewal was diligently submitted well in advance of the impending expiration date, which was scheduled for January 31, 2023.

2.2.2 Despite the early request, the MIDRMA faced significant challenges in obtaining updates regarding the license. Over the course of nearly 18 months, the MIDRMA continually inquires the FAA representative for updated information about the status of the license. This prolonged delayed communication led to growing concerns within the MIDRMA about the risk associated with the impending expiration of the license.

2.2.3 The subject was formally addressed during the last MIDRMA Board/18 meeting held in Doha, Qatar, on September 19 – 20, 2022. The primary agenda was the renewal request for the OFAC License and impending expiration of the license for the Iranian aircraft by the end of January 2023, and the status of the application pending since October 2021. During the meeting, exhaustive discussions took place to explore potential solutions to the problem. The FAA representative was invited to facilitate an urgent meeting with OFAC to convey the critical nature of the situation and the risks associated with the lack of known height monitoring. However, despite several attempts, the MIDRMA did not receive any update.

2.2.4 While Iran Civil Aviation Authority (ICAA) has displayed a positive stance and readiness to conduct height monitoring for all their RVSM-approved aircraft, the MIDRMA remains unable to respond positively to Iranian request due to the absence of the OFAC license.

2.3 *Conclusion*

2.3.1 In summary, the MIDRMA's commitment to implementing RVSM Minimum Monitoring Requirements (MMR) endorsed by ICAO Regional Monitoring Agencies (RMAs) remains unwavering. The importance of RVSM Height Monitoring in ensuring aviation safety cannot be overstated, and our ongoing collaboration with MIDRMA Member States has led to the publication of these requirements for the benefit of relevant authorities and operators.

2.3.2 It is to be highlighted that the increasing number of non-compliant aircraft for height monitoring each month. This alarming trend poses a serious risk to all other aircraft operating within the RVSM airspace. Immediate action is imperative to resolve the issue of lacking height monitoring capabilities to ensure the safety of all aircraft in the RVSM airspace. The MIDRMA updated list of non-compliance Aircraft registered in the MID Region States is at **Appendix A**. The list is updated on monthly basis and made available under the MIDRMA webpage.

2.3.3 The lack of progress in securing the OFAC license has imposed a substantial challenge on the MIDRMA and presents an escalating risk to aviation safety. The increasing number of non-compliant aircraft amplifies these concerns, demanding swift resolution to this critical issue to ensure the integrity and safety of the RVSM layer.

2.3.4 We have recently witnessed significant developments in our application of OFAC Licenses, crucial for conducting RVSM height monitoring. The approval of an OFAC License to monitor

Syrian RVSM-approved aircraft marks a positive step forward, although the impact may be limited due to alternative monitoring solutions employed by the Syrian Civil Aviation Authority (SCAA).

2.3.5 Concurrently, our efforts to secure an OFAC License for monitoring Iranian RVSM-approved aircraft have faced challenges, including limited communication and complexities in the renewal request. Despite these hurdles, the urgency of obtaining the license remains the utmost priority, given the increasing number of non-compliant aircraft each month operating within the RVSM airspace (monthly updated list is available under the MIDRMA webpage).

3. ACTION BY THE MEETING

3.1 The meeting is invited to:

- a) review and discuss the subject and contents of this Working Paper;
- b) note the efforts made by the States to ensure the compliance of the RVSM;
- c) discuss the action required to resolve the issue of granting an OFAC License for monitoring RVSM-approved aircraft registered in Iran;
- d) discuss the increasing number of Iran non-compliant aircraft required to be monitored and their potential impact on the safety of other aircraft operating within the RVSM airspace; and
- e) note and appreciate the efforts made by the FAA liaison for the MID Region.

| MID States | RVSM APPROVED A/C | HAVE RESULTS OR COVERED | NOT COVERED | NOT COVERED IN % | A/C MMR |
|-------------------|--------------------------|--------------------------------|--------------------|-------------------------|----------------|
| Bahrain | 64 | 60 | 4 | 6% | 3 |
| Egypt | 162 | 148 | 14 | 9% | 6 |
| Iran | 190 | 121 | 69 | 36% | 24 |
| Iraq | 59 | 56 | 3 | 5% | 3 |
| Jordan | 42 | 38 | 4 | 10% | 3 |
| KSA | 304 | 300 | 4 | 1% | 5 |
| Kuwait | 71 | 57 | 14 | 20% | 1 |
| Lebanon | 31 | 31 | 0 | 0% | 0 |
| Libya | 49 | 29 | 20 | 41% | 18 |
| Oman | 79 | 56 | 23 | 29% | 3 |
| Qatar | 298 | 298 | 0 | 0% | 0 |
| Sudan | 16 | 5 | 11 | 69% | 8 |
| Syria | 15 | 13 | 2 | 13% | 1 |
| UAE | 590 | 522 | 68 | 12% | 23 |
| Yemen | 6 | 5 | 1 | 17% | 1 |
| TOTAL | 1976 | 1739 | 237 | 12% | 99 |

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