



# Annual Report

## 2012-2013

## Table of Contents

	Table of Contents .....	i
<b>1</b>	<b>From the Ombudsman.....</b>	<b>1</b>
<b>2</b>	<b>Report Format .....</b>	<b>4</b>
<b>3</b>	<b>Seeking better noise outcomes – inputs .....</b>	<b>5</b>
	Complaints .....	5
	Complaint analysis and management system.....	9
	Community and industry engagement .....	9
	Research .....	10
<b>4</b>	<b>Seeking better noise outcomes – achievements .....</b>	<b>11</b>
	Noise improvement opportunities explored.....	11
	Information enhancements .....	12
	Case study review.....	13
	Publications .....	13
<b>5</b>	<b>Financial Results .....</b>	<b>14</b>
<b>Attachment 1</b>	<b>ANO Complaint Statistics.....</b>	<b>15</b>
<b>Attachment 2</b>	<b>ANO assessment of action on Review Recommendations ....</b>	<b>16</b>
<b>Case Studies</b>		
1.	Noisy cars have to have a muffler – why don't noisy planes? .....	10
2.	Planes are dive-bombing our homes!.....	11
3.	Less noise from 'full power' or 'full length' runway takeoffs? .....	12

### ANO contact

Website: [www.ano.gov.au](http://www.ano.gov.au)

Email: [ano@ano.gov.au](mailto:ano@ano.gov.au)

Freecall: 1800 266 040

Write to: Aircraft Noise Ombudsman  
GPO Box 1985  
Canberra City ACT 2601

# 1 From the Ombudsman

---

1.1 The past 12 months have been in large part about helping Airservices Australia (Airservices) to bed in new processes and I am pleased this has led to real progress in pursuing some of the noise improvement opportunities raised by this office. Airservices has finalised all but three of our review recommendations and there were no new major reviews completed in the period.

1.2 While I understand that the reform process underway in Airservices has, for many complainants, seemed unnecessarily slow, the progress in recent months is promising and I am looking forward to the next year being even more focussed on tangible actions and decisions.

1.3 Our key achievements in the past year have included the finalisation of some significant noise improvement opportunities (see, for example, the case studies included in this report). In some cases, investigation of these opportunities has resulted in changes that individuals and their communities have been seeking for some time, and will provide noticeable improvements in the noise environment.

**“A focus for next year is on more open public information and reporting on the investigations planned, underway, and concluded”**

In other cases, the opportunities have been found not to be feasible. For those affected by the noise, this outcome can, understandably, be very disappointing. Nevertheless, serious and thorough exploration of opportunities has been undertaken by Airservices in reaching a decision not to pursue an opportunity further. This work provides a clearer case for not making a change, and in turn may assist in complainants accepting a disappointing outcome. A focus for next year is on more open public information and reporting on the investigations planned, underway, and concluded.

1.4 My charter is to provide an independent administrative review of Airservices’ management of aircraft noise issues, specifically focussed on three areas:

- Complaint handling
- Information presentation and distribution
- Consultation

Our work with Airservices is consequently quite structured around these three areas, so I will briefly summarise the year for each below.



**“I am pleased this has led to real progress in pursuing some of the noise improvement opportunities raised by this office”**

## 1.5 Complaint handling

1.5.1 Our complaint load fell during 2012-13, with the average number of complaints per month falling from just over nine in the previous year to just over seven this year, with the last quarter having been the lowest quarter since the function commenced in September 2010. It is not entirely clear why this trend has emerged. I hope it is, at least in part, a reflection of the improving management of aircraft noise issues by Airservices, in response to our early recommendations now being implemented.

1.5.2 A revealing statistic that I rate as an achievement of this office, is the dramatic decrease in the number of contacts Airservices is receiving. The analysis in sections 3.9 and 3.10 tells this story. Again I hope that this is a sign that the implementation of ANO recommendations by Airservices is starting to deliver tangible outcomes. Importantly, when complainants contact the organisation less often, Airservices has the capacity to devote more effort and resources to the substance of the complaint.

1.5.3 Airservices' handling of complaints has come a long way and recent staff and management changes are setting Airservices up for even more positive change in the future. To contribute to this, in December 2012 we released the Terms of Reference for a Case Study Review "to identify any lessons learnt, or opportunities for improvement, through an analysis of a select sample of complaints that have not resulted in the complainant contacting the ANO". We commenced this work in the last few months and already have made a number of important findings that will lead to constructive recommendations for further improvement of Airservices' complaint handling service. Our report will be published following its submission to the Board of Airservices.

**"We have made a number of important findings that will lead to constructive recommendations for further improvement of Airservices' complaint handling"**

## 1.6 Consultation

1.6.1 We have continued to engage with community members and industry stakeholders through attendance at various community consultation group meetings and other industry forums. This is an integral part of our role in monitoring Airservices' consultation and information provision, but also a way in which we gather information about emerging aircraft noise issues.

**"We have continued to engage with community members and industry stakeholders"**

1.6.2 As with previous years, we have not made any formal recommendations to Airservices on their consultation activities, but we have provided feedback as appropriate. Airservices has been undertaking consultation activities in line with its *Communications and Consultation Protocol*, and the ANO office has recently reviewed Airservices' update of this document and provided feedback.

## 1.7 Information provision

1.7.1 Two of our reviews (Perth and Sydney) have had a strong focus on information presentation. Throughout the past year, Airservices has implemented most of the recommendations from these reviews and has made significant progress in this area. That said, because I consider information provision such an important component of managing aircraft noise issues, it will remain a key focus for the ANO in the next year.

**“Information provision will remain a key focus”**

1.8 Another significant piece of work undertaken during 2012-13 has been to research and assess options for the procurement of a complaint analysis and management system. While our existing systems have been adequate for our needs, we are now looking to implement a system to provide enhanced capability for identifying and assessing issues and trends. It will be implemented early in the coming financial year.

1.9 As mentioned, the ANO team is small and in my view ‘punches well above its weight’. There was no template for an Aircraft Noise Ombudsman when we started essentially from scratch in September 2010. What we have achieved since is down to the intellect, creativity, and consistently high quality of work produced by the team, and I commend them for their ongoing commitment.

1.10 I must also note that I have been strongly supported by the Chair and Directors of the Board of Airservices. The staff and management of Airservices have also been very supportive, and have been engaging positively in implementing recommendations and addressing systemic issues.

1.11 Finally, I wish to thank all of the community members who have engaged with the ANO office, either through community consultation group meetings or by lodging a complaint. My role, as Aircraft Noise Ombudsman, is to provide an independent administrative review of Airservices’ management of aircraft noise issues. The point of my role is ultimately to help Airservices to improve its handling of aircraft noise issues. Such improvements come through the analysis and identification of opportunities that in turn come from information provided by the community, including complaints.

1.12 Dealing with complaints, especially aircraft noise complaints, will always be a difficult and frustrating role, not least because so often there is nothing that can be done to reduce the noise. Nevertheless, I believe we have helped to achieve improvements in aircraft noise, and to help people understand why improvements can’t be made in other cases. I look forward to another productive year fostering improved noise outcomes for communities across Australia.

**“We have helped to achieve improvements in aircraft noise, and to help people understand why improvements can’t be made in other cases”**



Ron Brent  
Aircraft Noise Ombudsman  
8 August 2013

## 2 Report Format

---

- 2.1 Previously we have structured our Annual Report around the three key areas of focus as defined in the ANO Charter (complaint handling, information provision, and consultation). While these remain our areas of focus, this year, we have taken a different approach with how we present our report.
- 2.2 Our considerations of Airservices activities have focussed on seeking better noise outcomes. We accept that there are many cases in which there is no viable alternative that will improve the noise outcome, but this remains the ultimate objective. We have sought a change in approach to complaints and other feedback about noise issues: looking for a better noise outcome where possible rather than assuming none is possible.
- 2.3 Given this emphasis on better noise outcomes, we have tailored our report this year around the inputs and achievements of the ANO office in pursuing better noise outcomes.
- “We have sought a change in approach: looking for a better noise outcome where possible rather than assuming none is possible”**

### 3 Seeking better noise outcomes – inputs

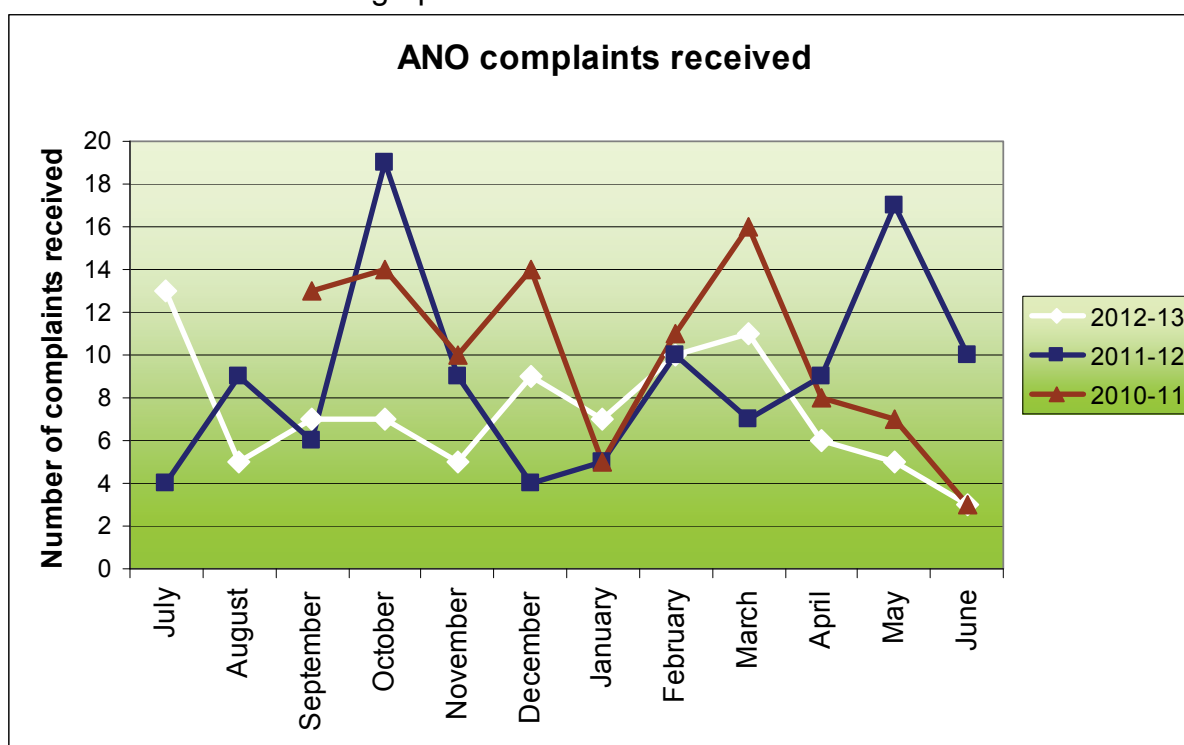
#### Complaints

3.1 The ANO has received fewer complaints in 2012-13 than in previous years.

	Total fin. year	Ave per month	% Change
Sep 2010-Jun 2011 (10 mths)	101	10.1	
Jul 2011-Jun 2012 (12 mths)	109	9.1	↓ 10.1%
Jul 2012-Jun 2013 (12 mths)	88	7.3	↓ 19.3%

3.2 It is not entirely clear why complaint numbers are falling, although it is what we would hope for as a result of changes made by Airservices in their handling of aircraft noise issues in response to ANO recommendations.

3.3 There is no apparent trend for what month or period complaints are received by the ANO office as the graph below shows.



3.4 We started the financial year with 32 open complaints and received a further 88 during the year, making the total number of complaints handled in the financial year 120, which is the same as the previous financial year. Of these, 98 were closed, 82 of which were reviewed. The remaining 16 were not reviewed as they were referred directly to Airservices for management, related to matters that fell outside our charter, or because the complainant did not provide any further information to enable the investigation to proceed. Twenty-two complaints remained open at the end of the financial year. **Attachment 1** summarises the year's complaint statistics.

3.5 As can be seen from the table below, a majority of the complaints reviewed were closed without any change being possible (74.1%). In these cases, complainants are provided with comprehensive explanations of why no change is possible. Generally, this is because safety or other operational factors require aircraft to fly where they do, or because changing where the aircraft fly would simply move the noise impacts to other residents and would not provide an overall noise improvement.

<b>Complaints reviewed and closed:</b>	<b>81</b>	
No change possible - explanation provided	60	74.1%
Change adopted by Airservices Australia	3	3.7%
Change adopted by Airport operator	15	18.5%
Change adopted by Operator	3	3.7%

3.6 When changes were able to be made, the majority this year were initiated by Airport operators, using tools such as Fly Friendly Agreements to reduce circuit training times and amend arrival or departure practices. Some improvements introduced during 2012-13 are outlined in chapter 4.

3.7 In line with last financial year, the average time taken to close complaints this year was 59 days (2011-12 average was 58 days).

3.8 Interestingly, while the ANO has had a significant fall in the number of complaints received in 2012-13 compared to 2011-12, Airservices has had only a small reduction in the number of complainants who contacted its Noise Complaints & Information Service. Given the 3% reduction in complainants that contacted Airservices in the past year compared with the previous year, an almost 20% reduction in complaints being escalated to our office is a positive sign.

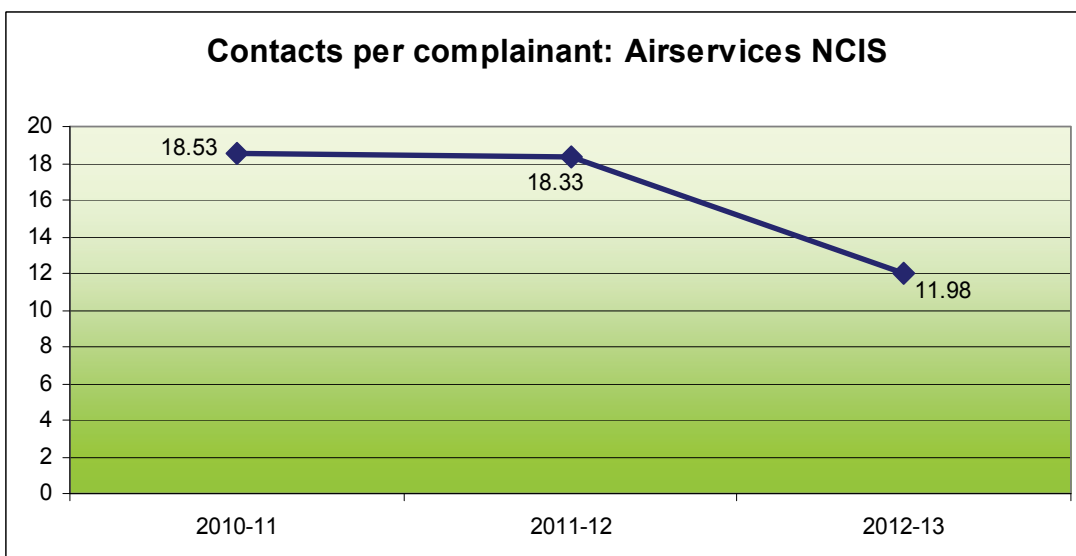
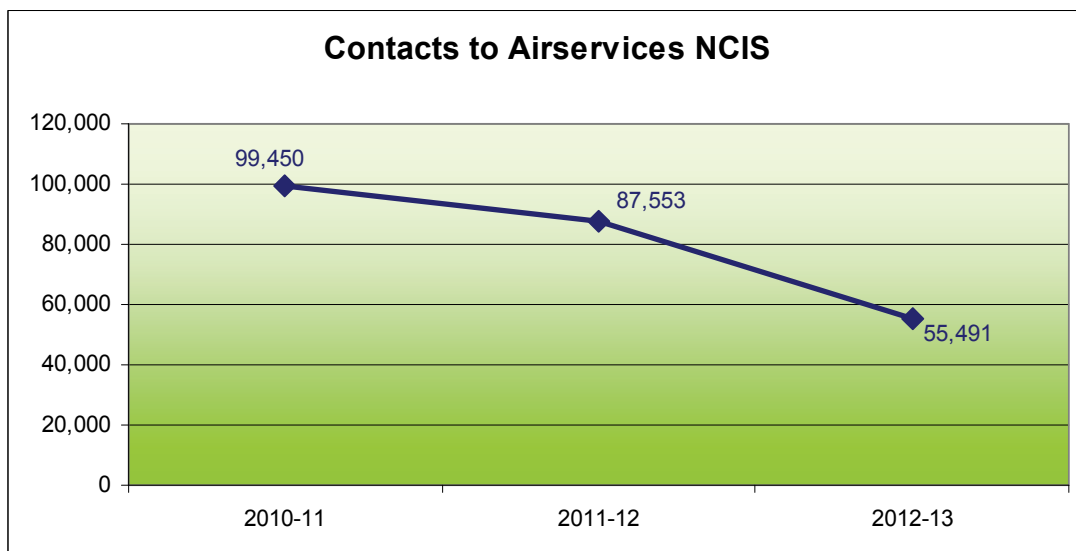
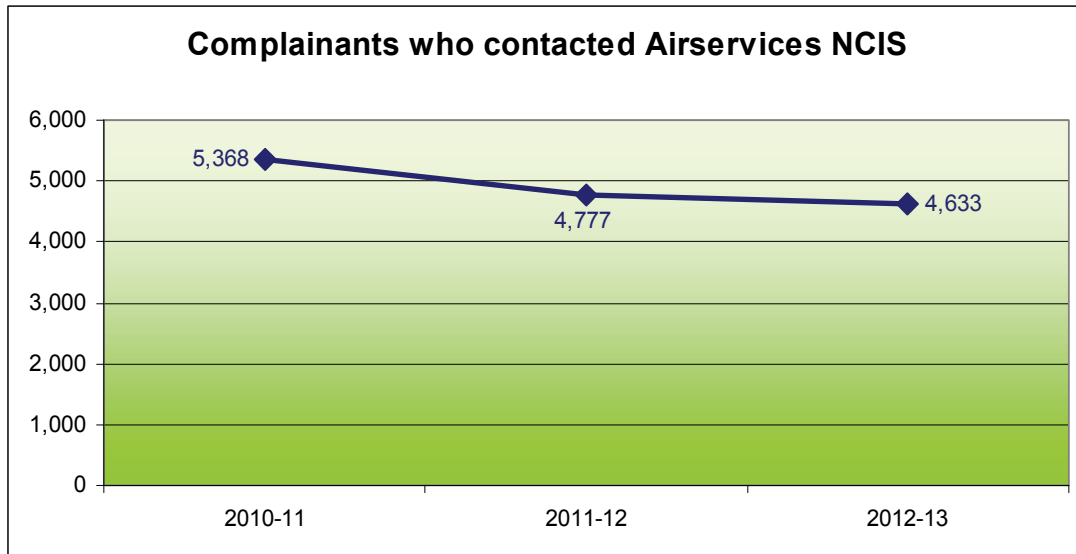
3.9 It is also particularly pleasing to see a marked reduction in the number of contacts Airservices has received, a fall of over 30,000, equivalent to almost 37% fewer contacts than in the previous year. This was a major element of our first review of Airservices' complaint handling and we have devoted significant effort to assisting Airservices in transitioning away from focusing on contacts. The graphs below show these statistics and an aggregated graph of contacts per complainant over the previous three financial years.

**“...we have devoted significant effort to assisting Airservices in transitioning away from focusing on contacts”**

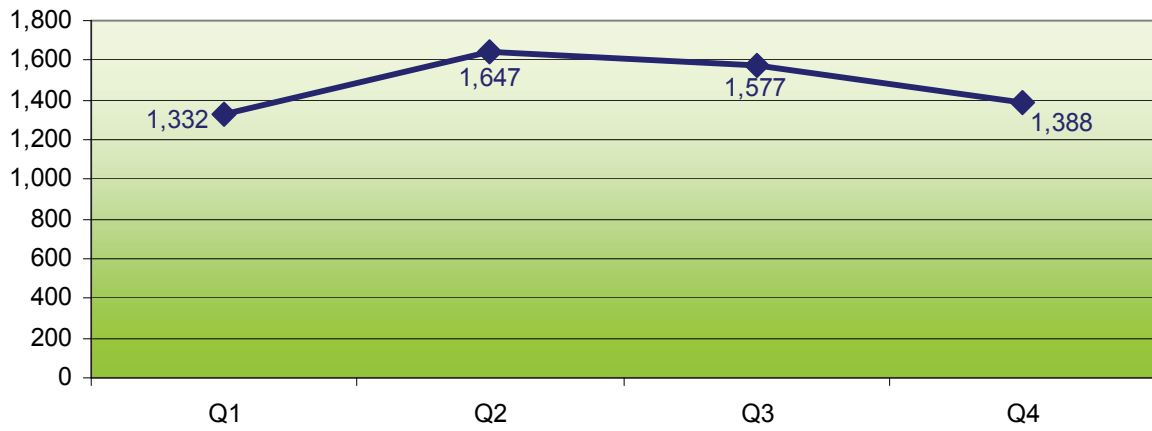
3.10 This trend is even more dramatic when studied across the past year only, when the effects of a change in approach is likely to have started to really translate into changed behaviours by complainants. The second page of graphs below show the quarterly results for complainants, contacts and the aggregate contacts per complainant. These demonstrate that, while complainant numbers have been roughly consistent through the 2012-13 financial year, the number of contacts has fallen markedly across the period.



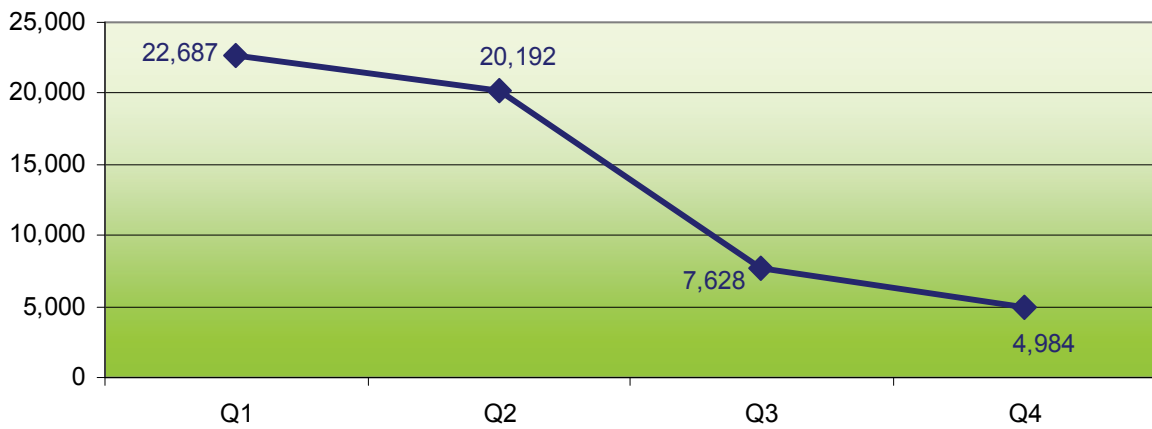
3.11 This is a highly pleasing result because, not only are complainants not wasting their own time lodging many contacts on the same issues, Airservices' staff are no longer spending large amounts of time processing repeat contacts and can divert this resource to seeking better noise outcomes.



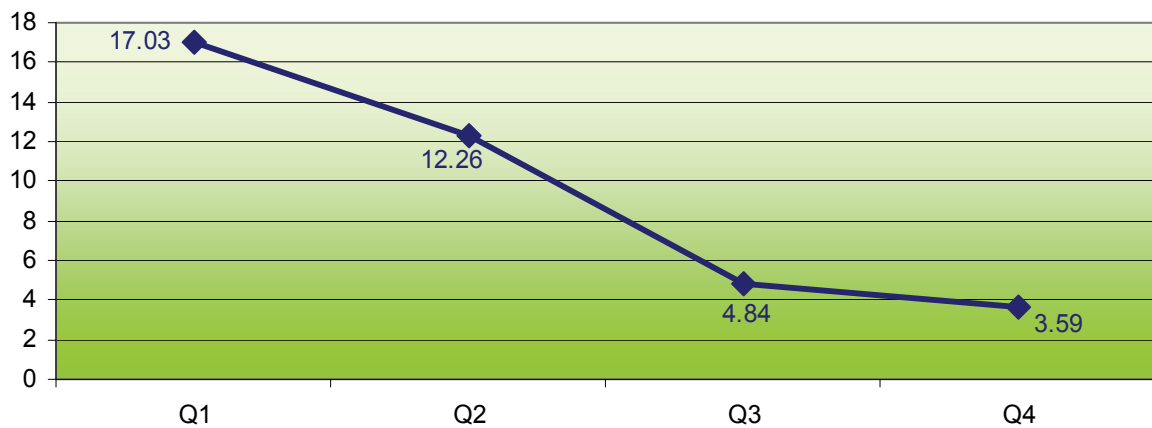
### Complainants who contacted Aircservices NCIS 2012/13



### Contacts to Aircservices NCIS 2012/13



### Contacts per complainant: Aircservices NCIS 2012/13



## Complaint analysis and management system

- 3.12 Another significant piece of work undertaken during 2012-13 has been to research and assess options for the procurement of a complaint analysis and management system. While our existing systems have been adequate for our needs, we are now looking to implement a system that will provide enhanced capability for identifying and assessing issues and trends.
- 3.13 Following a comprehensive market research and comparison exercise, we have settled on a service provided by the Bruel & Kjaer EMS Pty Ltd. It will be implemented early in the coming financial year and we look forward to undertaking some more powerful analysis of our complaints data with a view to identifying opportunities for improvement.

## Community and industry engagement

- 3.14 By attending community and aviation industry meetings across Australia, the ANO office is able to better understand the community and industry perspectives, monitor Airservices' information presentation and consultation activities, and identify emerging issues. It also provides an opportunity to increase public awareness of the ANO role, our recent activities, and the opportunities we are pursuing to improve noise outcomes.
- 3.15 This year the ANO attended or was represented at 13 Airport Community Aviation Consultation Group (or equivalent) meetings. Additionally, we attended various industry meetings, including the major annual conferences of the Australian Airports Association (AAA), the Regional Aviation Association of Australia (RAAA), the Australian Mayoral Aviation Council (AMAC) and the Australian Strategic ATM Planning Council (ASTRA). The ANO also participated in a review workshop that considered the Australian Standard AS2021-2000 (Acoustics: Aircraft Noise Intrusion – Building Siting and Construction), met with individuals and representatives of community groups, and mediated in a long-standing complaint between a complainant and an Airport.
- 3.16 A further opportunity pursued this year has been the provision of seven training sessions on 'Finding Better Noise Outcomes' to Air Traffic Control (ATC) groups at the major airports across Australia. This provided Airservices' senior air traffic control staff with direct access to the ANO in a workshop environment to discuss and explore how the ATC group can contribute to Airservices' management of aircraft noise issues. It also helped the ANO team in understanding the challenges of the ATC working environment and the less obvious factors that can inhibit noise improvement opportunities from being pursued. Further sessions are planned for the next financial year.
- “By attending community and aviation industry meetings, the ANO is able to better understand the community and industry perspectives”**

## Research

3.17 To ensure we can help Airservices to identify and deliver valuable improvements in its management of aircraft noise issues, the ANO keeps abreast of Australian and International approaches to managing aircraft noise. As well as considering whether standards, regulations and practices from other countries could benefit Airservices and the Australian community, this has included specific investigations, such as considering the viability of noise-attenuation measures for small aircraft engines (see Case Study 1).

### **C** Noisy cars have to have a muffler – why don't noisy planes?

**A** In response to queries raised by complainants living near Parafield and Moorabbin Airports, the ANO looked into the potential to fit mufflers for a type of aircraft that was noted by residents as being particularly noisy. We discovered how difficult and expensive such a solution might be.

**S** Unlike cars, aircraft are manufactured under strict certification standards, and any alteration to an aircraft, such as fitting a muffler, must meet these standards. For the aircraft type investigated, the ANO found that no such muffler system had been approved. We did find an overseas company willing to design, fit and seek certification for a muffler, but this relied on the Australian operator sending one of their aircraft overseas for the design, installation and test flying (which would represent a substantial cost to the client). The total cost was likely to be in the order of \$100,000 and no guarantee could be provided that the system would meet the Australian certification requirements.

**E** It is also not clear if the noise improvement from some aircraft operating with a muffler would translate to a noticeable noise improvement for those on the ground, who would still be over-flown by repeated circuit flights from a mix of aircraft types.

**S** Further, silencer systems, such as mufflers, do reduce performance (usually only 1-2%) and this would need to be taken into account for certification, as the twin-engine aircraft must be able to continue climbing after departure if one engine fails.

**T** All these factors need to be considered and they led us to the conclusion that a muffler for the particular aircraft type investigated is not a viable option at present. We do not rule out some further consideration of either the fitting of mufflers, or other redesign to reduce the noise (such as a different exhaust configuration). The ANO will continue to consider the issue to identify opportunities for noise improvements.

**U**

**D**

**Y**

**1**

## 4 Seeking better noise outcomes – achievements

### Noise improvement opportunities explored

- 4.1 The ANO's ultimate goal in seeking to improve Airservices' management of aircraft noise is to deliver a better overall noise outcome for the community. There are many factors that mean that making change can be particularly challenging in a safety-critical, "24/7", and complex operating environment like aviation. It is also the case that the industry and Airservices has been actively managing the environmental impacts of aviation for a long time, so the scope for improvement is generally at the margins. However, this does not mean that there are no opportunities to be found, or that the changes are not worth pursuing because they are small or at the edges. Complaints are an excellent insight into where such opportunities lie.

#### **C** Planes are dive-bombing our homes!

**A** Mr R contacted the ANO in July following extended exchanges with Airservices about his concern that circuit training aircraft were 'dive-bombing' the homes in his area near Jandakot Airport during engine failure simulations. Mr R described the experience as follows:

**S** *"Trainee pilot flies out from runway 24/06 a certain distance, usually just short of the residential area. Then he cuts his engine, turns right, descends to just above our homes and, at a few hundred feet, restarts with a tremendous roar."*

**E** Airservices responded a number of times, eventually advising that the rules for circuit training are a national standard, that under these rules engine failure simulations were allowed, that such simulation exercises will continue to occur, and that Airservices could not identify any likely improvement in the noise exposure at Mr R's location.

**S** The ANO investigated operations at other training airports and discovered that training restrictions existed at almost all other training airports such that engine failure simulations did not occur over residential areas or, in some locations, were not permitted at all. On the basis of this, the ANO requested that Airservices explore the option of introducing restrictions at Jandakot Airport. Airservices subsequently pursued this with the Airport management, training operators and the Civil Aviation Safety Authority. The result was that engine failure simulations are no longer performed over residential areas near Jandakot Airport. New procedures have been adopted to restrict such practices to areas over the aerodrome. The change has removed noise and potential safety impacts, with no apparent negative operational impacts.

- 4.2 The above case study highlighted the need for Airservices to change its approach to complaints and other feedback about noise issues. Emphasis must be placed on looking for how a better noise outcome can be achieved rather than presenting reasons to explain the existing outcome. This is an important cultural shift and we have been pleased that Airservices has restructured its complaints team in a way that places emphasis on the role of investigating complaints to find better noise outcomes.

- 4.3 Airservices has also created a Strategic Noise Improvement Plan through which it records noise improvement opportunities, manages priorities, and tracks progress of investigations underway. The ANO is keen for as much information about the opportunities under consideration and already considered to be made available to the public in as open and transparent a manner as is practical. We are also keen to see more first level investigations undertaken and all investigations finalised more quickly, again with the results presented to affected communities and the broader public in a timely and open fashion. This is an area we expect to be working on with Airservices over the coming year.
- 4.4 The ANO has done a few investigations of this type and our reports are available on the ANO website. For example, in May 2012, the ANO received a letter from a federal MP about the potential for improving the noise exposure in Perth by increasing the number of ‘full power’ and/or ‘full length’ runway takeoffs. Case Study 3 below outlines our investigation.

### **C** Less noise from ‘full power’ or ‘full length’ runway takeoffs?

**A** Full power takeoffs were previously considered by the Perth Airport Noise Management Consultative Committee (ANMCC). The result was that they were not considered to be a viable noise reduction strategy. Accordingly we advised Mr Irons and did not consider this option further.

**E** The ANO did look at the option of starting all takeoffs at the beginning of the runway, rather than from an intersection along the runway. Although this would increase taxiing for aircraft, the idea was that it might result in aircraft being higher sooner and this would reduce noise.

**S** We compared the noise recorded at Airservices’ noise monitors for full length runway takeoffs and takeoffs from an intersection. We then considered the results alongside the information available from Airservices’ aircraft noise modelling software and previous considerations undertaken by the ANMCC. The ANO concluded:

- T**
- U**
- D**
- Y**
- 3**
- While there are minor differences in the findings between the three sources (the ANO analysis, Airservices’ modelling and the ANMCC findings), the measured increases or decreases are well within the levels of statistical variation that can be expected from the small sample size. In effect, the results from our analysis match the theoretical modelling. All three sources show no significant or discernible difference in noise for Perth residents when full length departures are used for jet aircraft.
  - Given the potential detrimental effects of using full length departures (increased taxiing, potential safety implications due to additional runway crossings, reduced airport capacity/flexibility) and that there did not appear to be evidence of discernible improvements in noise outcomes, there is no justification for additional investigation at this time.

### **Information enhancements**

- 4.5 Where changes cannot be made, it is important that communities have access to relevant information so that they can manage the noise issues they are experiencing. This might be in the form of helpful information about how to reduce noise impacts in their home, what the noise situation is like in different areas for those considering a move, how and why aircraft fly as they do, why different runways are selected and, importantly, why a change that seems reasonable cannot be made.

4.6 In the 2012-13 year, the ANO did not issue any new report on information provision as Airservices continued to implement the recommendations of our two reports on this subject issued in the previous financial year. One year after each report was initially issued, the ANO published an assessment of Airservices' response at that time. All but three of the recommendations from the reviews have now been implemented. This resulted in Airservices making important improvements in the presentation of their Aircraft Noise Information reports and the material available on their website. A useful suite of fact sheets and location-specific information packs has been developed. There is always room for improvement and information resources will continue to develop and evolve over time. Airservices will also implement the remaining three recommendations from previous reports. Airservices has made solid progress in the past year and we look forward to the momentum continuing.

### Case study review

4.7 One of the objectives of the ANO is to review the handling of aircraft noise complaints or enquiries made to Airservices. In February 2011, we released our first report into Airservices' complaint handling practices and processes and Airservices completed all recommendations from this report by early 2013 (see **Attachment 2** for a summary of all recommendations made by the ANO).

4.8 Airservices' handling of complaints has come a long way and recent staff and management changes are setting Airservices up for even more positive change in the future.

4.9 To contribute to this process of continuing improvement, in December 2012 the ANO released the Terms of Reference for a Case Study Review "to identify any lessons learnt, or opportunities for improvement, through an analysis of a select sample of complaints that have not resulted in the complainant contacting the ANO". We commenced this work in the last few months and already have made a number of important findings that will lead to constructive recommendations for further improvement of Airservices' complaint handling service.

4.10 A report will be published following its submission to the Board of Airservices.

### Publications

4.11 During 2012-13 the ANO published the following reports and articles, in addition to our quarterly reports and last year's annual report (available on our website):

- ANO assessment of Airservices Australia's response to the Assessment of Aircraft Noise Information (Sydney)
- The Truth About Aircraft Noise article
- ANO assessment of Airservices Australia's response to the Perth Aircraft Noise Information Review
- Parafield aircraft noise issues
- Full length departures - potential noise benefits (Perth)
- Case studies in complaint management - Airservices Australia - Terms of Reference

## 5 Financial Results

---

- 5.1 The ANO operates autonomously in managing its financial accountabilities. In line with the ANO Charter, although funding is provided by Airservices, the ANO independently determines how funds and resources are allocated. Nevertheless, those funds are provided from the Airservices budget and detailed accounting appears in the Airservices financial reporting.
- 5.2 In 2012-13, the total costs of the office were \$591,220 which includes all staff salaries and entitlements, travel, and administrative overhead costs. Staffing levels have remained unchanged through the year, at a full-time equivalent of 3.0.



## Attachment 1 ANO Complaint Statistics

---

The following summarises the ANO complaint statistics for 2012-13.

Complaints carried forward from 2011-12	32
Complaints received 2012-13	88
<b>Total complaints 2012-13</b>	<b>120</b>

<b>Complaints closed during 2012-13</b>	<b>98</b>
-----------------------------------------	-----------

<b><u>Closed complaints - reviewed</u></b>	
No change possible - explanation provided	61
Change adopted by Airservices Australia	3
Change adopted by Airport operator	15
Change adopted by operator	3
<b>Total complaints reviewed</b>	<b>82</b>

<b><u>Closed complaints - not reviewed</u></b>	
Referred to Airservices to respond directly	9
Complainant did not provide further information	2
Outside Charter scope	5
<b>Total complaints not reviewed</b>	<b>16</b>

<b>Complaints carried forward to 2013-14</b>	<b>22</b>
----------------------------------------------	-----------

## Attachment 2 ANO assessment of action on Review Recommendations

During the 2012-13 year the ANO closed all recommendations associated with the following reviews:

- *Complaints Handling Review – Airservices Australia, February 2011*
- *Aircraft Noise Information and Complaint Resolution: Perth, November 2011*

Three recommendations remain in progress from the *Assessment of Aircraft Noise Issues: Sydney, February 2012*, as per the following table.

Sydney Review	
Recommendation	ANO assessment of Airservices' response
<p><b>Sydney Issues Recommendation 2:</b> Airservices should improve the clarity of maps produced in reports used to convey aircraft noise information.</p>	The ANO notes that action is underway.
<p><b>Sydney Issues Recommendation 3:</b> Airservices should provide more textual and qualitative assessment of aircraft noise in reporting.</p>	The ANO notes that action is underway.
<p><b>Sydney Issues Recommendation 7:</b> Airservices should explore the provision of a more timely (as well as historical) method for complainants to understand why a particular Runway Mode was in use, or why a preferred Runway Mode (noise sharing) was not able to be used at that time.</p>	The ANO notes that action is underway.