



Quarterly Report
January – March 2014

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1 Introduction

- 1.1 This report includes complaint statistics and a summary of ANO activities during the January to March 2014 quarter. It is structured around the three key functions of the ANO, these being review and monitoring of Airservices Australia's:
- complaint handling
 - consultation and
 - provision of information about aircraft noise.

2 Overview

- 2.1 A key achievement in the past quarter has been publication of our *Case Studies in Complaint Management* report in January 2014. The report is available at: http://www.ano.gov.au/reportsstats/reports/Case_Studies_Complaint_Management_Jan14.pdf
- 2.2 Another success has been the finalisation of several long-standing cases. These have each resulted in small changes to improve the noise outcome. In the case of aircraft climbing to drop parachutists at Coffs Harbour, feedback from the complainant has been very pleasing:

Thank you for a wonderful job done. They still are overhead in the drop but the only thing I hear is the chutes opening. I'm glad for everybody involved, and their businesses, that it can just take a few changes and everyone's happy. Thanks again, massive improvement.

3 Complaint handling

- 3.1 In the quarter, the ANO received 30 new individual complaints, which is just over 30% higher than the 2013 quarterly average of 22.75. However, this is consistent with the pattern of previous years for which the first quarters tend to have a higher number of complaints than the annual average. This brings the number of complaints received to an overall total of 375 since we commenced operations in September 2010. At the end of the quarter, 15 complaints were open. More detailed complaint statistics to the end of March 2014 are included at **Attachment 1**.

Seeking noise improvement opportunities

- 3.2 One of the core focuses of our investigations into complaints is to look for the potential to improve noise outcomes. The following table summarises the noise improvement opportunities stemming from complaints received by the ANO that were finalised (Table 1) during the quarter. There are currently no potential noise opportunities under investigation that stem directly from complaints to the ANO.

Table 1: Noise improvement opportunities finalised during the quarter

Complaint received by ANO	Description of initiative	Current status
Dec 2012	Coffs Harbour – Can parachute aircraft climb over areas that do not affect residential areas as much as the current climb locations do?	The ANO requested Airservices to consider better alternative areas for parachute climb, and if none possible, to explain why they must climb where they do. Airservices delayed consideration of this until the radar service was available again. The radar was commissioned in Aug 2013. Airservices explored opportunities for the parachute aircraft to climb further from residential areas, following which the complainant has reported a discernible improvement (see quote in paragraph 2.1 above).
Mar 2013	Jandakot – Can training flights avoid flying over Baldivis and surrounding residential areas?	The ANO requested Airservices to explore with the local community forum and operators any options to reduce the flights over Baldivis and surrounding residential areas. With assistance from the ANO, Airservices has undertaken discussions with relevant stakeholders and is helping update the fly neighbourly agreement to specify residential areas to be avoided where possible, and minimum altitudes where over-flight cannot be avoided.

3.3 We have also added a table (Table 2) for matters that the ANO is monitoring in response to complaints. These are matters that are long-term or ongoing work being managed by Airservices. The ANO complaints have been closed on the basis that Airservices is managing the matter but we are monitoring Airservices' handling of the issues until they are completed.

Table 2: Noise improvement opportunities – ANO monitoring Airservices' management

Complaint received by ANO	Description of initiative	Current status
Nov 2010	Perth – Can the flight path over Roleystone be relocated to an area that does not affect so many residences?	In Aug 2013, Airservices commenced a 12 month trial of an alternative flight path, following which Airservices will make a decision about permanent implementation.
Apr 2012	Brisbane – Can some northbound and westbound departures from runway 19 depart on additional tracks to reduce the concentration of noise over current areas?	Airservices examined the option of a noise sharing approach, where a single departure track is replaced with multiple tracks to enhance noise sharing. Airservices identified that such an arrangement has not previously been trialled in Australia, however, Airservices intends to consider this approach in the future. Trials of this approach are not likely to be held in Brisbane initially due to the operational constraints of the airport. This type of trial is unlikely to commence elsewhere before 2015.
May 2012	Perth – What is the plan to address the numerous issues and requests associated with Chidlow?	Airservices has investigated several opportunities, including one that has led to a trial of a changed departure procedure. The trial will be finalised in March 2014 with a report to be tabled at the next Perth community aviation consultation meeting.
Oct 2013 – Mar 2014	Fly Neighbourly Agreements – Tyagarah, Traralgon, Tyabb	The ANO is monitoring Airservices' management of noise issues in these locations, stemming from a number of complaints. Airservices has agreed to continue offering their assistance to the relevant local councils to establish fly neighbourly agreements with operators and to keep residents notified of progress.

'Fly friendly' agreements: noise improvement or unnecessary intervention?

Background

C In January, a letter to the editor of a local newspaper advocated for a 'fly friendly' agreement, encouraging residents to contact the Aircraft Noise Ombudsman. The ANO
A office did receive a number of contacts from local residents, including one that was against
S the idea of a 'fly friendly' agreement, saying it was an unnecessary intervention.

What is a 'fly friendly' agreement and why have one?

E A 'fly friendly' agreement is a set of courteous flying practices ideally developed through
S consultation between the aerodrome owner, local operators and residents. It recognises
T that there needs to be a balance between residents' reasonable expectations and the
U rights of the aviation industry to operate. As the correspondent to our office rightly pointed
D out, aviation contributes significantly to the economy of a region and any constraints on
Y that activity, while improving the noise outcomes for some may negatively affect the
broader community.

The ANO has seen the benefits of such 'fly friendly' agreements in other locations and supports a locally tailored solution. Often, when the communities and operators take the time to understand each other's needs and interests, the agreement is more effective at getting the balance right. In many cases the introduction of (or amendment to) a 'fly friendly' agreement delivers an improved noise outcome with minimal impost on the activities of the operators. Perhaps many of these practices are already in place, and by having them published (usually on a website), local residents have some visibility into the procedures. The 'fly friendly' can also provide an opportunity to rule out options that may seem reasonable to non-pilots, but that are not operationally viable.

How does the ANO consider these issues?

When the ANO receives a complaint we consider it on its merit with particular attention to whether there are any opportunities for improvement – in terms of both Airservices' handling of the issues, and the aircraft noise outcome. The ANO does not require a minimum number of complaints to pursue an improvement opportunity. Equally, while we consider all submissions carefully, we do not offset the number of complaints with the number of any counter-views – these are also simply part of our consideration process.

We often see local campaigns run to encourage many people to contact authorities (such as Airservices or the ANO) in the belief that action must then be taken. Our approach is rather to look for whether a noise improvement can reasonably and practically be made and, if so, to pursue it. We do not have regard for the number of complainants or how many times they have contacted us – we focus on the substance of the issue.

Obviously, a change of greater reach and impact should receive priority where resource-demand is a factor. However, for those affected by aircraft noise, even very small improvements can make a big difference. The effect of aircraft noise is very subjective. Noise that seriously annoys one person may not even be noticed by another.

Outcome

In this case our view is that the nature of a Fly Friendly agreement, and the value of discussing noise issues in the context of such an agreement, outweighs the risk that an agreement would unduly constrain flying. Given the voluntary nature of such agreements, and the legitimate needs for aviation in the area, the outcome of discussion will not disadvantage businesses and recreation aviation users.

4 Consultation

- 4.1 The ANO office was represented at a number of airport consultative meetings and other industry forums during the quarter, in line with our role of monitoring Airservices' consultation and information provision. Attendance at such meetings helps us to better understand the information requirements of communities and other stakeholders, which allows us to provide more effective feedback to Airservices on these issues.
- 4.2 One of the forums was the Airservices and Australian Airports Association aircraft noise forum held in February. This is a forum for industry stakeholders to focus specifically on the issue of aircraft noise. I am optimistic that some of the actions identified at this recent forum will lead to improved information for the communities affected by aircraft noise and an approach by industry that is better aligned with complaint-handling best practice.

5 Information Provision

- 5.1 We continue to consider opportunities to improve the way that Airservices reports on aircraft noise issues and complaints. We still see instances of Airservices referring to contacts as complaints and strongly urge Airservices to give priority to stopping the practice of crediting repeat contacts with the status of separate complaints. In its public reporting Airservices has now stopped reporting the number of contacts, however, the information about contacts (labelled as 'complaints') is still provided to Airports, and still referred to in various contexts.
- 5.2 I recently spoke with an Airport manager about why he saw value in receiving the information from Airservices. Following our discussion he agreed that the number of times a resident has contacted Airservices is not of interest, but rather the substance of the complaint is what he is interested in. I would like to see Airservices complete the move away from reporting contacts as complaints by no longer providing reports on contacts as part of complaint analysis. There may be a continued need for internal reporting of contacts as a workload indicator while some airports may still want reports on total contacts for historical comparison.
- 5.3 There has been no change to the status of the outstanding recommendations from our *Assessment of Aircraft Noise Information (Sydney)* report, with two recommendations still to be closed. The ANO notes that Airservices is working to make changes to their reports over the coming two quarters to potentially address recommendation 2 (and possibly recommendation 7) of that report.
- 5.4 We have also identified a number of recommendations for further improvement of public information, along with improved complaint handling, in our *Case Studies in Complaint Management* report, published in January 2014.
- 5.5 **Attachment 2** lists the two ongoing recommendations from our *Assessment of Aircraft Noise Information (Sydney)* report and all recommendations from our *Case Studies in Complaint Management* report.

6 Conclusions

- 6.1 Publication of our major *Case Studies in Complaint Management* review was a key achievement this quarter. We look forward to continued reform and improved quality in Airservices' handling of complaints and information provision as they action the recommendations.
- 6.2 We are keen to see the improved public reports Airservices is finalising over the next two quarters and a continuing focus on complaint issues and identifying potential opportunities for noise improvements.
- 6.3 We also see the use and publication of contacts data as a key issue. It is important to remove the public reporting of repeat contacts (especially when labelled 'complaints') because it rewards some individuals for lodging repeated contacts on the same issue. We will continue to work with Airservices to address this issue in line with the recommendation from our very first formal report published in early 2011.



Ron Brent
Aircraft Noise Ombudsman
1 April 2014

Attachment 1 Complaint Statistics

The following table summarises the complaint statistics both for the quarter and also since the establishment of the ANO.

	Jan 2014	Feb 2014	Mar 2014	Total for quarter	Total from 1 Sep 10 to 31 Mar 14
Complaints received:	8	9	13	30	375
Complaints closed:	7	12	16	35	360
Total complaints closed - not reviewed:					85
Complainant did not provide further information					16
Outside charter scope					17
Referred to Airservices to respond directly					52
Total complaints closed - reviewed:					275
No change possible - explanation provided					230
Change adopted by Airservices Australia					11
Change adopted by Airport operator					24
Change adopted by Aircraft operator					10

Attachment 2 ANO assessment of action on Review Recommendations

Recommendations are classified as 'ongoing' where there remains work to be undertaken by Airservices Australia.

Assessment of Aircraft Noise Issues: Sydney (March 2012)

Since the last report to the Board, there has been no change to the status for ongoing recommendations for the *Assessment of Aircraft Noise Issues: Sydney* report. Two remain to be finalised.

Ongoing recommendations	ANO assessment of Airservices' response
<p>Sydney Issues Recommendation 2:</p> <p>Airservices should improve the clarity of maps produced in reports used to convey aircraft noise information.</p>	<p>The ANO notes that action has been undertaken to improve the maps produced in reports.</p> <p>The ANO will review the new versions before determining closure of this Recommendation.</p>
<p>Sydney Issues Recommendation 7:</p> <p>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>	<p>The ANO notes that action is underway.</p>

Case Studies in Complaint Management (January 2014)

Airservices has been actively pursuing work in response to all recommendations made in the *Case Studies in Complaint Management* report. Several sub-parts of recommendations have been closed, although no complete recommendation is yet finalised. The table below summarises the status of recommendations.

Ongoing recommendations	ANO assessment of Airservices' response
<p>Case Studies Recommendation 1:</p> <p>Airservices should:</p> <ol style="list-style-type: none"> amend its contact acknowledgement and reference numbering system. Complainants should not be notified of a new reference number for each and every contact made. Complainants advised that responses will not be made on a particular issue, should not be responded to on that issue. Airservices should clarify what the reference number provided to complainants actually means acknowledge the lack of timeliness, apologise and provide a brief explanation for the delay where service delivery standards are not met be mindful of balancing the resource burden with the value to the complainant when considering the provision of ongoing information, particularly if similar information has already been provided. Procedures or guidelines should be established to assist staff with making these decisions. 	<p>Airservices action plan finalised.</p>

Ongoing recommendations	ANO assessment of Airservices' response
<p>Case Studies Recommendation 2:</p> <p>Airservices should:</p> <ul style="list-style-type: none"> a. as far as practicable, assign complaints to an airport, rather than a generic category b. provide reports to airports that provide sufficient detail to help identify meaningful issues and avenues for potential improvements c. be clear to complainants about what is, and is not, provided to airports about their complaint d. ensure that information provided to complainants is accurate and does not potentially misrepresent the situation, or contradict other information published by Airservices on their website e. consider opportunities to take the lead in consulting various stakeholders as part of the process to identify noise improvement outcomes, rather than refer complainants to those stakeholders with the expectation that the complainant will manage that consultation process. 	<p>Airservices action plan finalised.</p>
<p>Case Studies Recommendation 3:</p> <p>Airservices should:</p> <ul style="list-style-type: none"> a. develop and implement processes to ensure all appropriate information about complainants is passed to other authorities when undertaking a transfer of a complaint b. clarify when a response will be provided. Information linked to the complaint form should explain that a response will be provided where specifically requested, where a question has been asked or where a response can provide useful and relevant information. The exception to this rule should be when a complainant has explicitly requested no response or when a complainant has been advised previously that the particular issue has been dealt with to finality. 	<p>Airservices action plan finalised.</p>
<p>Case Studies Recommendation 4:</p> <p>Airservices should:</p> <ul style="list-style-type: none"> a. store all correspondence relating to a complaint in a single repository, accessible to all complaint handlers and, to the extent practicable, accessible through the relevant NCMS database record b. ensure complaint records are managed in compliance with the National Archives Act 1983 as well as relevant Australian Standards and Australian Government recommended practices. c. standardise the salutations, introductory text and sign-off styles used for correspondence with complaints d. carefully consider the expectations created by encouraging further contact and only do so when appropriate e. use other means to contact clients whenever details have been provided and the primary means of contact fails. 	<p>Airservices action plan finalised.</p>
<p>Case Studies Recommendation 5:</p> <p>Airservices should routinely analyse complaints to identify common issues not yet addressed by the current suite of fact sheets and develop fact sheets or standard responses for residents raising the same issues.</p>	<p>Airservices action plan finalised.</p>

Ongoing recommendations	ANO assessment of Airservices' response
<p>Case Studies Recommendation 6:</p> <p>Airservices should:</p> <ul style="list-style-type: none"> a. establish clear protocols for when residents are to be referred directly to an external authority b. review its Guide and Protocols documents and current practices to ensure that documented procedures for managing unreasonable complainant behaviour are followed in practice, including consistent and timely application of management plans for persistent complainants, and ensuring that it is cases of unreasonable behaviour that are subject to 'formal restriction' not complainants c. check compliance with its Guide and Protocols in an internal audit/review process for complaint management. 	<p>Airservices action plan finalised.</p>