



REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

Information Circular No. 36 Issue 01

Compliance with CPDLC Process and Procedures

1. Introduction

It has been reported to the SMCAA by Eurocontrol, that there have been a large number of breaches committed by T7 registered aircraft regarding complying with ATM procedures, these are:

- a) Not complying with the mandatory CPDLC logon procedure
- b) Lack of aircraft registration on the Eurocontrol Logon List
- c) Wrongly filed flight plans not representing the actual capabilities of aircraft

2. Mandatory Login of CPDLC:

This is the current list of places where login is mandatory.

[Maastricht UAC \[EDYY\] above FL245](#)

Cyprus [LCCC] above FL: 285 – AIP GEN 3.4

Hungary [LHCC] above FL285 – AIP GEN 3.4

Finland [EFIN] above FL095 AIP GEN 3.4

Denmark [EKDK] above FL285 AIC 5/23

Sweden [ESMM & ESOS] above FL285 AIP GEN 3.4

Romania [LRBB] above FL285 AIP GEN 3.4

Serbia and Montenegro [LYBA] above FL205 AIP GEN 3.4

Czech Republic [LKAA] above FL 195 AIP GEN 3.4

France [LFFF, LFEE, LFMM, LFBB & LFRR] above FL195 AIC10/23 & AIP GEN 3.4

Switzerland [LSAG & LSAZ] above FL 145 AIP GEN 3.4

Slovakia [LZBB] above L 285 AIP GEN 3.4

Croatia [LDZO] above FL285 AIP GEN 3.4

Bulgaria [LBSR] above FL215 AIRAC AMDT 5/24

Slovenia [LJLA] above FL285 AIP GEN 3.4

Poland [EPWW] above FL285 AIP GEN 3.4

Spain & Canaries – coming soon



REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

3. Applicability of CPDLC equipped aircraft

Aircraft that are equipped with ATN CPDLC (equipment code J1) and are registered on the Eurocontrol Logon List.

These flights need to be always connected to CPDLC in applicable airspace or indicate that they are not able to connect, either via removing the capability J1 from the FPL and entering DAT/CPDLCX for temporary exemption (as per EASA SIB 2020-03) or by declaring “UNABLE CPDLC” on the frequency.

4. Applicability of filing errors in the ICAO Flight Plan

Aircraft that are equipped with ATN B1 CPDLC as filed J1 in the flight plans, but have also filed

- a) DAT/CPDLCX which is incorrect and is against the EASA requirements. Either exemption of the EC IR2023/1770 (DAT/CPDLCX) or compliance (J1 in EQPT) shall be filed. Operators must note that the logon requirement has nothing to do with the equipage requirement through EC IR2023/1770. The minimum flight level for logon is published in the relevant AIPs. For example, Maastricht UAC it is FL245+, but in France it is FL195+ for all equipped aircraft.
- b) These aircraft need to comply with the EC IR2023/1770 AUR.COM.2005 (1)(b), LFFF will join in November 2025 and Spain is expected to join Q1 2026, which requires the aircraft operator to ensure that CPDLC connection can be established. To allow logon for many European countries (see Figure 1), your aircraft must be registered on the EUROCONTROL Logon List.

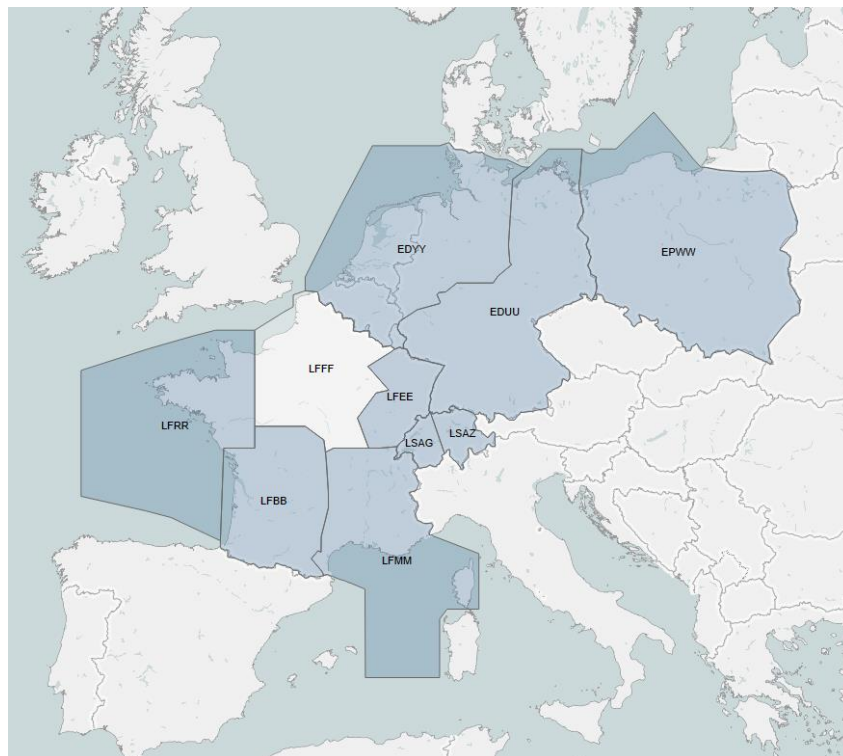


Figure 1



REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

5. Annex: Rules of the Air

SERA.15005 Establishment of CPDLC

- (a) CPDLC shall be established in sufficient time in advance to ensure that the aircraft communicates with the appropriate air traffic control unit.

SERA.15015 Construction of CPDLC messages

In case of technical problems, flight crews shall report “UNABLE CPDLC” on initial contact, which will be recorded in the MUAC system (see AIP Germany).

Please see the Figure 2 below, indicating the areas where CPDLC logon is mandatory (blue) by AIP.

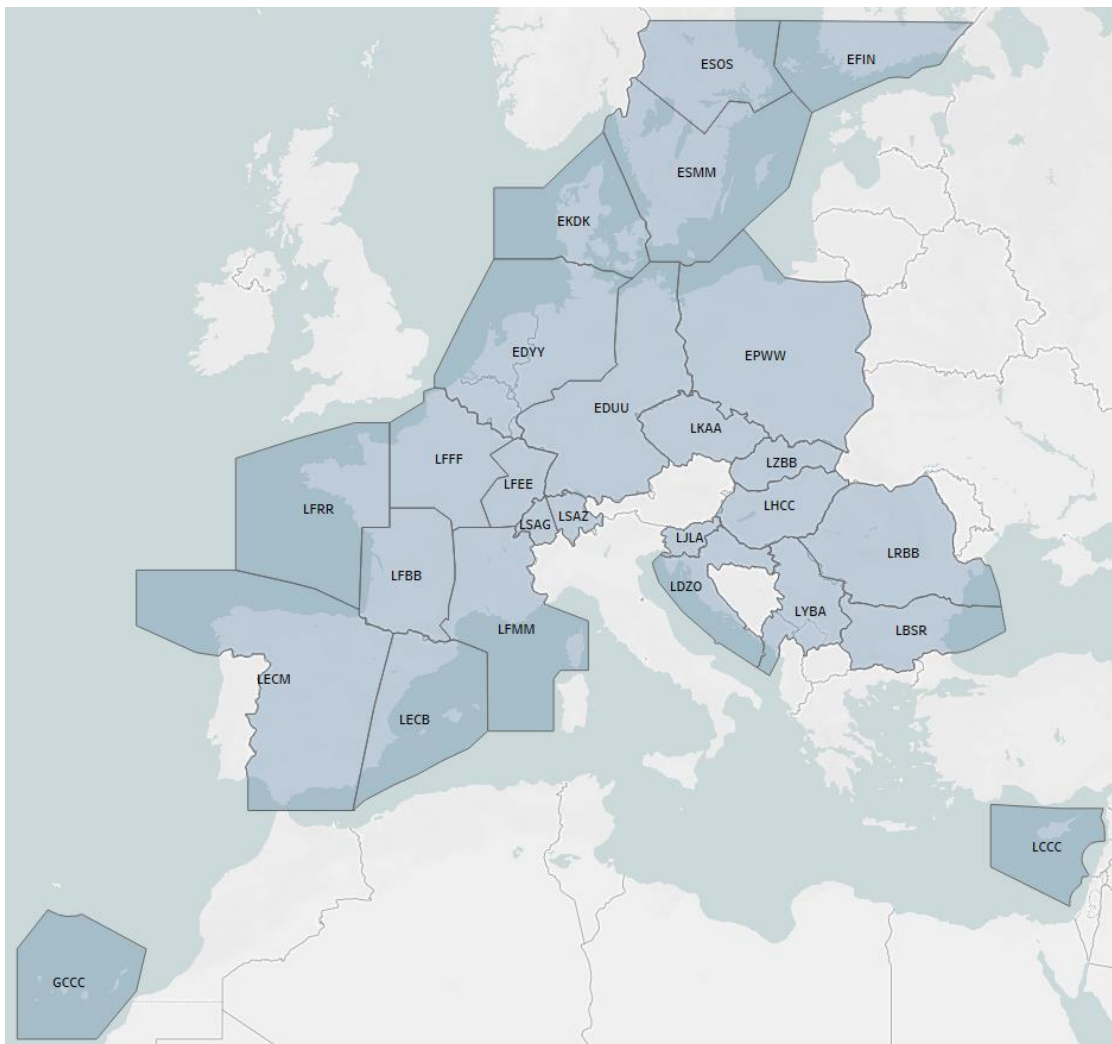


Figure 2



REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

6. ICAO Annex 10 Volume 2 para 8.1.1.1.1 requirement

8.1.1 Data link initiation capability (DLIC)

8.1.1.1 GENERAL

8.1.1.1.1 PANS.— Before entering an airspace where data link applications are used by the ATS unit, data link communications shall be initiated between the aircraft and the ATS unit in order to register the aircraft and, when necessary, allow the start of a data link application. This shall be initiated by the aircraft, either automatically or by the pilot, or by the ATS unit on address forwarding.

8.1.1.1.2 PANS.— The logon address associated with an ATS unit shall be published in the Aeronautical Information Publications in accordance with Annex 15.

Note 1. A given FIR may have multiple logon addresses; and more than one FIR may share the same logon address.

Note 2. Detailed specifications concerning aeronautical information publications presentation and contents are contained in the Procedures for Air Navigation Services — Aeronautical Information Management (PANS-AIM, Doc 10066),

7. COMMISSION IMPLEMENTING REGULATION (EU) 2023/1770 Annex I

AUR.COM.2005 Requirements on aircraft equipment

1. The aircraft operator shall:
 - (a) ensure that any aircraft it operates have the capability to operate the following data link services:
 - (i) Data Link Communications Initiation Capability;
 - (ii) Air Traffic Control (ATC) Communications Management;
 - (iii) ATC Clearances and Information;
 - (iv) ATC Microphone Check.
 - (b) make appropriate arrangements to ensure that data exchange can be established between its aircraft having data link capability and all ATC units which may control the flights it operates, with due regard to possible coverage limitations inherent in the communication technology used.



REPUBLIC of SAN MARINO CIVIL AVIATION AUTHORITY

8. Mandatory Occurrence Reporting

Please note that in compliance with EU 2015/1018 events which are considered aircraft related occurrences:

- a) Aircraft deviations from applicable air traffic management (ATM) regulations of aircraft deviation from applicable published ATM procedures; and/or
- b) Deviations from aircraft ATM-related equipment carriage and operations, as mandated by applicable regulations.

are considered reportable occurrences and future non-compliances may be reported to EASA by Eurocontrol.

9. Useful Sources of Information

[Eurocontrol Guidance Documents](#) – recommended practices

[Ops Group – Datalink in Europe](#) – What are the Rules

ICAO Doc 10037 Global Operational Data Link (GOLD) Manual

Operators of T7 registered aircraft are to ensure compliance with applicable ATM requirements relating to CPDLC process and procedures and that all staff, dispatchers, pilots and flight planning providers are made aware of the content of this information circular.

Yours faithfully,

Eng. Marco Conti
Director General

13th May 2025