Montevideo, May 8, 2026.

ACTAU TECHNICAL CIRCULAR No. 01/2026

Preventive recommendation regarding the non-operational use of ILS Category III B RWY 25 at SUMU

Scope: Air Traffic Controllers of SUMU, TWR Carrasco, and APP Carrasco
Subject: Technical, operational, and safety conditions for the potential use of ILS CAT II & III RWY 25
Nature: Technical, preventive, and union recommendation based on operational safety
Reference Documents: DTA Circular No. 04-2026; Internal SMS Note NO/13/2026; Informative Technical Note ILS CAT III; LAR 153; CA/AGA/153-005

Development

PREVENTIVE TECHNICAL RESOLUTION. ACTAU recommends that the ILS Category III B RWY 25 at SUMU not be used operationally, nor should operations under associated CAT III B/LVP minimums be accepted, until the competent Authority and the ATS service provider documentarily prove full, prior, and verifiable compliance with the operational safety conditions detailed in this circular.
This recommendation does not constitute opposition to technological modernization. On the contrary, it is issued precisely to preserve the operational safety of the system, ATC personnel, crews, passengers, and the aerodrome, preventing an infrastructure improvement from being put into service without the human, procedural, technological, and risk management requirements demanded by an all-weather operation of this criticality.

THESE MEASURES UNDER NO CIRCUMSTANCES ENDANGER THE LIFE, SAFETY, OR HEALTH OF ALL OR PART OF THE POPULATION.

1. Purpose of the circular

This circular aims to establish ACTAU's preventive technical position regarding the implementation of ILS CAT II & III RWY 25 at Carrasco International Airport (SUMU), recommending its non-operational use as long as conditions persist that, by their nature, prevent considering the resulting safety level acceptable:

- the lack of availability of a surface movement radar (SMR) or equivalent surface surveillance system for operations with RVR below 350 m;
- the insufficiency of minimum operational staffing to sustain LVP/CAT II & III with functional separation of tasks, coordination, supervision, and contingencies, especially given the difference

between the minimum of four controllers per shift foreseen in the operational draft and the current reality of two controllers per shift;

- training not yet completed, not universal, and subject to actual demonstration of operational competence;
- the absence of comprehensive validation through realistic simulation with all equipment installed, operational, and under normal and abnormal scenarios;
- the need to have definitive, approved, disseminated, and practiced ATS procedures coordinated with the airport operator;
- the need for a final, formal, traceable risk analysis approved by the competent SMS structure, with explicit acceptance of the residual risk level.

2. Relevant background arising from official documentation

DTA Circular No. 04-2026 expressly acknowledges that the Division submitted technical-operational reports requesting the postponement of the commissioning, based on identified operational safety risks, the need to complete specific training, and current limitations in operational human resources.

Likewise, the same circular states that until the training of all operational ATC personnel is completed and the operation is simulated with all equipment installed and fully operational, the resulting safety level is not considered acceptable for the operational implementation of ILS CAT II & III.

This internal recognition is decisive: if the technical-operational body itself identifies that the safety level is not acceptable until training, simulation, and validation are completed, ACTAU cannot recommend its members to operationally use a CAT II & III procedure as if those conditions were met.

It also emerges from the DTA Circular that the proposed implementation included July 9, 2026, as a possible date, in order to complete the AIRAC cycle and have CAA acceptance of processes concluded by the DTA, once the training demonstrating the competence required by regulations is finalized.

To that extent, it was proposed to issue a NOTAM indicating that, due to incomplete ATC training, only ILS V RWY 25 and LOC V RWY 25 would be usable.

Internal SMS Note NO/13/2026 adds another critical aspect: the use of ILS CAT II & III was contingent upon the outcome of the latest risk analysis and achieving an acceptable safety level.

The same note warns about weaknesses in the hierarchy, autonomy, and structure of the ATS SMS function, which makes it particularly delicate to compromise the operational safety of an implementation of this magnitude without clear, formal, and robustly supported risk acceptance.

3. Technical characterization of CAT II & III risk

CAT II & III operations cannot be treated as a simple reduction of approach minimums. It is an all-weather operation in which the aircraft may approach and land with extremely limited or practically non-existent

visual references, depending critically on the integrity of the ILS signal, the condition of visual aids, the protection of critical and sensitive areas, runway incursion control, and reliable surveillance of the movement area.

The base technical documentation indicates that ILS CAT II & III allows operating with RVR as low as 50 m and DH below 50 ft or even without DH. In this environment, any inadvertent entry of an aircraft, vehicle, or person into the protected area, any undetected runway occupation, or any disturbance of the ILS critical or sensitive areas can transform a normal operation into an event of extreme severity:

- the tower may not have sufficient visual contact to confirm a clear runway or taxi trajectories;
- the crew may not have timely visual references to detect obstacles;
- the ILS signal must be protected from interference generated by aircraft or vehicles;
- ATC decisions must be made with complete, reliable information and in very short times;
- the recovery margin from operational error, communication failure, degradation of aids, or runway incursion is extremely low.

4. Lack of surface movement radar: incompatibility with CAT II & III RVR

The most serious technical issue is the lack of a surface movement radar (SMR) or equivalent surface surveillance system.

LAR 153, section 153.490, establishes that the operator must provide a surface movement guidance and control system designed considering traffic volume, expected visibility conditions, the need for pilot orientation, aerodrome layout complexity, and vehicle circulation. Furthermore, it states that the SMGCS must help prevent inadvertent entry of aircraft and vehicles onto an active runway and prevent collisions in the movement area.

The same section 153.490(f) of LAR 153 states that surface movement radar must be provided in the maneuvering area of aerodromes intended for use in conditions where RVR is less than 350 m. The planned CAT III B operation for SUMU, with RVR potentially below 350 m, falls directly under this provision. Therefore, if the aerodrome does not have an operational SMR or accepted equivalent system, the CAT III B operation lacks an essential technological barrier for surface surveillance.

Advisory Circular CA/AGA/153-005 reinforces the same criterion: in poor visibility conditions, preventing incursions may require an electronic surveillance means that provides the ATC with a guarantee that the active runway is truly clear. It also points out that the installation of surface movement control radar contributes to safety and efficiency in reduced visibility and at night, allowing constant verification of runway occupation and taxiway use.

Technical conclusion: the administrative measure of "only one aircraft in motion" can reduce exposure, but it does not substitute the surface surveillance requirement nor does it by itself resolve the loss of visual

contact, verification of a clear runway, detection of vehicles, towing, FOD, unauthorized occupations, or position errors in CAT II & III conditions.

5. Staffing shortage and operational workload

ACTAU considers that the lack of personnel is a critical operational bottleneck. CAT III B/LVP operation requires the unit to simultaneously sustain aerodrome control functions, ground control or surface coordination, TWR-APP coordination, monitoring of aids, ATIS/RVR management, coordination with vehicles and the aerodrome operator, supervision, log recording, and contingency response.

The DTA Circular itself mentions "current limitations of operational human resources" as grounds for postponing implementation. It also foresees that, as a contingency associated with staff availability, the post-implementation stage be evaluated by keeping only one operation in the movement area at a time. This formulation confirms that the operation is not supported by a robust and stable workforce, but by a restrictive mitigation aimed at compensating for human and technological shortcomings.

The minimum staffing for CAT II & III cannot be defined solely by the physical presence of controllers in the room. It must be defined by functional positions actually covered, operational rest, relief capacity, available supervision, contingency management, and the ability to sustain workload without cognitive degradation. Operating LVP/CAT II & III B with reduced staffing increases the risk of saturation, omission, coordination errors, and delays in detecting unsafe conditions.

It should be noted, moreover, that the draft document on LVP operation in TWR estimates a minimum staffing of four (4) controllers per shift for its operation. However, the current operational reality of TWR Carrasco is substantially different: it routinely operates with two (2) controllers per shift. In practice, this would imply that, for indefinite periods, the operation could end up being sustained by a single effective controller in position or with a functional distribution incompatible with the demands specific to LVP/CAT II & III B.

This difference between the minimum technical requirement and the actual staffing does not constitute a mere administrative difficulty: it constitutes a latent condition of operational risk. Currently, there is no structural solution to the staff shortage nor reasonable prospects for correction in the short or medium term. Therefore, it is inappropriate to enable an operation of maximum criticality based on a contingency that, due to its duration and indefiniteness, ceases to be exceptional and becomes part of the normal mode of service provision.

Likewise, it is noted that the creation or activation of the Tower Supervisor position as an organizational barrier for LVP/CAT II & III B involves the assignment of an additional functional responsibility, not agreed upon in the latest discussion with DINACIA for the new MADOR, of high technical and legal criticality. Nevertheless, the available documentation does not address the regime of recognition, compensation, or differential remuneration associated with said responsibility.

ACTAU understands that a function with greater decision-making, supervisory, and potentially disciplinary load cannot be incorporated without previously defining its duties, scope, conditions of exercise, institutional backing, and corresponding remuneration. Furthermore, the implementation of an agreement on appropriate remuneration mentioned in DTA Circular No. 04/2026, "the introduction of special tower and approach procedures and the generation of operational positions with additional functions," is still pending.

6. Training, simulation, and demonstration of competence

Training cannot be reduced to an informative session or theoretical familiarization. The DTA Circular establishes that, prior to commissioning, training must involve TWR SUMU and APP Carrasco ATC personnel, including specific instruction in LVP, ILS CAT II/III operation, protection of ILS critical and sensitive areas, TWR-APP coordination, contingency management, system degradation or failure.

More importantly, the DTA Circular itself demands a demonstration of operational competence, not limited to theoretical instruction, and training in normal and abnormal scenarios, including technical failures, capacity reduction, staff shortage, and suspension or degradation from CAT III to CAT II or CAT I. Consequently, as long as there is no individual, documented, and evaluated record of competence, the operation must not be enabled for the affected ATC personnel:

- individual record of attendance, evaluation, and approval;
- tower and approach simulation with normal, degraded, and emergency scenarios;
- specific practice on protection of ILS critical and sensitive areas;
- scenarios involving failure of RVR, lighting, communications, ILS, stop bars, vehicles, and staff reduction;
- clear criteria on when to suspend CAT III and downgrade to CAT II, CAT I, ILS V, or LOC;
- operational validation with all equipment installed, fully operational, and coordinated.

7. Procedural and coordination deficiencies

CAT II & III B operation requires a closed procedural system. It is not enough to publish an approach or have a radio aid available. There must be specific ATS procedures, TWR-APP coordination, LVP activation/cancellation rules, phraseology, ATIS/RVR handling, protection of LSA/LCA, taxi limitations, vehicle control, contingencies, degradations, and responsibilities clearly defined between ATSP and the aerodrome operator.

8. Identified Risks

Hazard	Main Cause	Possible Consequence	Measure required before operating CAT III B
Undetected occupied runway	Loss of visual contact and absence of SMR/A-SMGCS	Runway incursion during CAT III B approach	Operational SMR or accepted equivalent surveillance; verifiable clear runway procedures
ILS signal interference	Entry into critical/sensitive areas by aircraft or vehicle	Automatic flight path deviation at very low altitude	LSA/LCA protection published, practiced, and controlled; unambiguous CAT III holding points
ATC Saturation Insufficient training Incomplete procedures	Reduced staffing and multiple simultaneous functions Theoretical familiarization without demonstration of competence Lack of comprehensive ATSP-aerodrome operator validation	Coordination omissions, late clearances, or sequencing errors Uneven application of procedures and contingencies Informal transfer of risks to the controller on duty	Specific minimum staffing, supervision, coordination, and suspension criteria due to staff shortage Individual evaluation, simulator, normal/abnormal scenarios and formal records Definitive ATS procedures, letter of agreement/operational agreement, and

			validation with all actors
Unmanaged degradation of aids	Failure of lights, RVR, ILS, communications, or stop bars	Improper continuation of CAT III operation	Degradation tables, NOTAM, suspension criteria, and specific training

9. ACTAU Technical Recommendation

Based on the background, ACTAU formally recommends:

- Not to use the ILS CAT II & III RWY 25 at SUMU operationally until the technical, human, and procedural conditions indicated in this circular are fully met.
- Request DINACIA/CAA and the DTA to issue or maintain a NOTAM limiting use to ILS V RWY 25 and LOC V RWY 25, or the appropriate procedure, while incomplete training, lack of validation, or absence of acceptable safety conditions exist.
- Require a written report, signed by the competent authority, accrediting the closure of the final risk analysis, the accepted residual risk level, and mandatory mitigations.
- Require documentary confirmation that the aerodrome complies with LAR 153.490 for operations with RVR below 350 m, especially regarding surface movement radar or an accepted equivalent system.
- Require specific minimum staffing for LVP/CAT II & III operations, with automatic suspension/downgrade criteria in case of staff shortage.
- Require that any creation, activation, or assignment of the Tower Supervisor position for LVP/CAT II & III operations be previously regulated in writing, including responsibilities, limits of action, institutional coverage, and additional remuneration for the assumed responsibility.
- Require complete, practical, evaluated, and documented training for all involved ATCs, including demonstration of operational competence.
- Require realistic simulation and operational validation with all equipment installed and fully operational, including normal, degraded, and abnormal scenarios.

10. Recommended Conduct for ATCs on Duty

Do not apply LVP Procedures until adequate operational safety conditions are met as described above. Specify that due to a lack of personnel, it is not possible to use ILS Cat II & III under operational safety conditions.

11. Minimum Conditions to Review this Recommendation

ACTAU may review this recommendation only when the following is accredited, at a minimum:

- Operational SMR/A-SMGCS or formally accepted equivalent system for operations with RVR below 350 m;
- Approved final risk analysis, with a matrix of hazards, severity, probability, mitigations, responsible parties, and accepted residual risk;
- Minimum operational staffing defined by procedure, with functional positions and contingencies;
- Definition of the Tower Supervisor position, if used as an operational barrier, with a functional regime, institutional backing, and specific compensation;
- Complete training of all involved ATC personnel, with individual evaluation and demonstration of competence;
- Realistic simulation and operational validation with all equipment installed and fully operational;
- Definitive ATS procedures published, disseminated, and practiced;
- Formal ATSP-aerodrome operator coordination through an agreement, operational letter, or equivalent document.

12. Institutional Closing

ACTAU reaffirms that operational safety cannot be subject to administrative shortcuts. A CAT III B operation requires a complete system: infrastructure, surface surveillance, procedures, sufficient personnel, evaluated training, simulation, inter-institutional coordination, and a robust SMS. The absence or weakness of any of these barriers transforms the operation into an unacceptable transfer of risk to the controller on duty.

Therefore, until the indicated conditions are met, ACTAU recommends the non-operational use of ILS CAT II & III RWY 25 at SUMU and the adoption of the formal measures necessary to maintain the operation within an acceptable level of safety.

For ACTAU, Board of Directors / Technical Commission
Uruguayan Air Traffic Controllers Association

Annex I - Document Sources Considered

- DTA Circular No. 04-2026, "Pending stages for the implementation of the ILS CAT III RWY 25 system at SUMU in ATS", Carrasco International Airport, May 4, 2026.

- Internal SMS Note NO/13/2026, Air Traffic SMS Office, Air Circulation Directorate, DINACIA, April 27, 2026.
- LAR 153 Aerodrome Operations, Fifth Edition, Amendment 9, December 2023, adopted by DINACIA Resolution No. 406-2024.
- Advisory Circular CA/AGA/153-005/000, "Surface Movement Guidance and Control Systems (SMGCS) and Apron Management Service", DINACIA.
- ICAO Doc 9365, Manual of All-Weather Operations; ICAO Doc 9476, SMGCS Manual; ICAO Doc 9859, Safety Management Manual; ICAO Doc 4444, PANS-ATM.