

First Name	Last Name	Organisation you represent :	Organisation type:	Your contact details (email) for any follow up:	Your view of the proposal:	Reasons for your view:	Any specific safety concerns you feel are not addressed in the proposal or you wish to highlight:	Any other comments on the proposal, including any feedback on the alternative departure route option on page 10:	Approx. how many movements per year do you operate, or operate from your base? (if applicable)	What weather conditions do you typically operate in?	How often do you operate in marginal VMC conditions?	Do the operating aircraft have Electronic Conspicuity? (if known/applicable)	What airborne surveillance and/or EC solution do you/they use? (pick all that apply)
		Parham Airfield Museum	Local airport/strip		No objection – neither supporting or not	I acknowledge receipt of your consultation email. Parham is not an active airfield with flying or indeed any usable runways, so we do not have an opinion on this proposal.							
		British Gliding Association (CEO)	National body		Support - you are in favour of the proposal	Thanks for the engagement. The BGA recognises the safety benefits of GNSS approaches and particularly for HEMS activity. GNSS approaches become a problem when operators utilise a GNSS approach to attract commercial air transport which immediately increases risk within the local airspace and results in attempts to establish controlled airspace to the detriment of all other airspace users. Assuming there are no plans of that nature, we support the proposal.							
		NIPAS	National body		Support - you are in favour of the proposal	The rollout of PINS approaches allows modern helicopters to make use of their advanced avionics to conduct safe IFR recoveries in marginal weather conditions.	Nil	Nil					
		Airfield Operators Group	National body		Support - you are in favour of the proposal								
		Lydd Airport	Local airport/strip		No comment - this lets us know that you have read the document and have nothing to add								
		British Helicopter Association (BHA)	National body		Support - you are in favour of the proposal	The BHA fully supports this application as it benefits the UK population	Nil	The alternative departure route may cut down the track miles flown to RTB the helicopter but at what height would you expect the helicopter to be before it comes 'inland'. This will help inform the public so know what noise to expect if the alternate departure is flown					
		Bristol Helicopters, MCA	Local aircraft operator		Support - you are in favour of the proposal	We are also users of RSCH and would support the implementation of a PinS approach procedure.	Nil	Due to the alleviations that we operate under, we would be unlikely to use the procedure as our internal aids and SOPs would permit us to operate to a significantly lower altitude than the 500' minimum suggested in the proposal.	400	VMC & IMC	Often	All	Mode A, C or S Transponder ADS-B Out
		East Sussex Gliding Club	Local airport/strip		No comment - this lets us know that you have read the document and have nothing to add	Unlikely to affect gliding or motorglider operations at our site.				Good VMC only (>5km vis and >1000ft ceiling)	Never	Most (70% or more)	Flam
		Brighton City Airport Ltd	Local airport/strip		Support - you are in favour of the proposal	Please see attached letter.	Please see attached letter.	Please see attached letter.	45000	VMC & IMC	Often	Most (70% or more)	ATC FID project underway which will allow ATC to "see" ADSB and FLARM equipped aircraft
		Truleigh Farm	Local airport/strip		No objection – neither supporting or not	Unlikely to affect any Aircraft operating out of Truleigh Farm Strip			200	VMC and sometimes marginal VMC (less than 5km vis and/or less than 1000ft ceiling)	Sometimes	Some (but less than 70%)	Mode A, C or S Transponder
		BHA ESC HEMS PinS sub-group	National body		Support - you are in favour of the proposal	As Chair of the British Helicopter Association sub-group which proposed a trial of this type of approach to the CAA at the end of 2020, I am delighted to see this important development finally being realised. It has always been a concern that patients' chance of survival, with timely delivery to A&E, have those chances compromised by certain weather conditions in which the latest equipment is more than capable of flying in. This approach has to possibility to save lives.	Although satellite-based navigation, using Required Navigation Performance designed instrument approaches, is a step change improvement over the current lack of facility the regrettable withdrawal of the EGNOS Safety of Life Service by the current government for purely political reasons has robbed Air Ambulances of the best minima afforded by Localiser Performance with Vertical Guidance (LPV). The substitute LNAV line of minima raises the point-in-space at which visual reference with the ground has to be established. Especially at a coastal location where orographic cloud can form even 100' difference can mean success or failure for an approach. Relying on EGNOS will reduce the risk to some patients lives during periods of reduced cloud base and or visibility.	None					
		Deanland airfield	Local airport/strip		Support - you are in favour of the proposal	In respect of the PinS approach, Broadly speaking Deanland supports the ACP - however we do have some safety concerns and we believe these should be addressed by the Sponsor and should be considered by the CAA when they Review the Airspace Change Proposal submission document							None Mode A, C or S Transponder ADS-B In ADS-B Out Flam
		Ministry of Defence	Government Department		No objection – neither supporting or not	This proposed change is not anticipated to have an impact on military flying.	N/A	N/A					
		NATS	National body		Support - you are in favour of the proposal								

From: ACP-RSCH ACP-RSCH@specialist-aviation.com
Subject: FW: Airspace Change Engagement
Date: 8 December 2023 at 08:50
To: [REDACTED]

A

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From: ACP-RSCH
Sent: 08 December 2023 08:49:43 (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: ACP-RSCH
Subject: Airspace Change Engagement

Dear Sir/Madam

I am writing to invite your views on an Airspace Change Proposal that we are progressing on behalf of Air Ambulance Charity Kent Surrey and Sussex.

We are seeking to introduce Instrument Approach and Departure procedures to Royal Sussex County Hospital Brighton to be used for HEMS (Helicopter Emergency Medical Services).

You will find enclosed a description of the proposal and details of a survey to capture your views.

We invite you to complete the survey to give us your feedback before the end of the engagement on 26 January 2024. Alternatively, please contact me by email or phone if you would like to discuss it.

Yours


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From: ACP-RSCH ACP-RSCH@specialist-aviation.com 
Subject: Re: Airspace Change Proposal - Reply Requested
Date: 5 January 2024 at 13:49
To: ACP-RSCH ACP-RSCH@specialist-aviation.com

A

Dear Sir/Madam

This is a reminder email for you to give your views on the Airspace Change Proposal described below.

The engagement closes in 3 weeks on 26 January. Please provide your feedback before this date if you wish to respond.

I have re-enclosed the description of the proposal, including instructions on how to give feedback.

Yours

[Redacted signature]

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From: ACP-RSCH
Sent: 08 December 2023 15:37
Subject: Airspace Change Proposal - Reply Requested

Dear Sir/Madam

I am writing to invite your views on an Airspace Change Proposal that we are progressing on behalf of Air Ambulance Charity Kent Surrey and Sussex.

We are seeking to introduce Instrument Approach and Departure procedures to Royal Sussex County Hospital Brighton to be used for HEMS (Helicopter Emergency Medical Services).

You will find enclosed a description of the proposal and details of a [survey](#) to capture your views.

We invite you to complete the survey to give us your feedback before the end of the engagement on 26 January 2024. Alternatively, please contact us by email if you would like to discuss it.

..

To: Specialist Aviation Services (SAS) the CAA sponsor of ACP-2023-028, "PinS Instrument Procedures, Royal Sussex Hospital Brighton".

Thank you for inviting feedback from Deanland Airfield, via the PowerPoint document emailed to us on the 8th December 2023. Having reviewed the document, I provide the following comments in relation to safety and also the contents of the provided document.

Firstly I represent the owners of Deanland Airfield LLP and as such this response does not necessarily represent all the views of pilots and operators that are based at the Airfield. Organisations that are part of NACMAC also represent the wider aviation community, and many pilots flying from Deanland are either LAA, BMAA, or AOPA members by virtue of the type of aircraft flown.

Deanland Airfield has a total of 45 based Aircraft, operating throughout the year and has planning approval for up to 6000+ movements in any given year.

At Deanland we actively support the Kent Surrey and Sussex Air Ambulance (KSSAA) and have on many occasions over the recent years held fly-in's in aid of the charity. KSSAA is a cause close to that of our based pilots and we raised a total of £2586,10 at a breakfast fly-in, in 2023.

In respect of the PinS approach, Broadly speaking Deanland supports the ACP - however we do have some safety concerns and we believe these should be addressed by the Sponsor and should be considered by the CAA when they Review the Airspace Change Proposal submission document.

Impact on Airspace Users

Location of the Approach and missed approach procedure – risk to transiting aircraft

This is by design over the sea to the south of the coastline to provide separation from the high ground and to some extent the towns of Brighton, Saltdean, Telscombe Cliffs and Peacehaven.

However this route is regularly used in changeable or poor weather, for traffic recovering from the West routing Eastbound and in the case of traffic at Deanland, routing via the Ouse Valley (or via longer route round Beachy Head and in via the low lying Pevensey Marshes).

The thought of a fixed wing flying (quite legally VFR in VMC) low level over the sea in un-forecast challenging VFR conditions at 700ft AMSL, only to find a helicopter letting down, or climbing up through the cloud is quite concerning, especially as the VFR pilot may be under high workload and possibly in reducing visibility. Certainly, it seems the major risk is for traffic passing south of Brighton, where the helicopter is letting down via a PinS approach.

The UK weather is highly changeable, coastal conditions along this coastline present very changeable and often un-forecast weather, or weather that arrives sooner than it is forecasted. Local aircraft returning to base do on occasions experience very challenging

localised conditions. As part of Threat and Error Management (TEM) pilots plan for alternative routes and “plan B,C and D” and this routing is planned for.

Statement inferring procedure is only to be used in poor weather

We do not agree with your statement “since the PinS procedure is for use in poor weather there will be little “local area” VFR traffic”. In your Economic Impact, you state that this will be used for IFR currency training and so we would expect A109 aircraft to be flying the approach in VMC while under instruction. Consideration should be given at this point for other traffic such as Paragliders and Hang Gliders often seen up to 3500 FT AMSL in the local area, specifically where the instrument approach commences.

Shoreham Mitigation

Mention is made within your PowerPoint of the use of Shoreham ATC when the approach is being flown, via a Letter of Agreement (LoA). This would certainly provide traffic transiting the class G an awareness of the approach being flown to the east, but only if they communicate with Shoreham. We would request the you and the CAA consider how a pilot would know that an Instrument approach in Class G, some 14miles to east of Shoreham would have a service provided by shoreham. It is well known, that when transiting past an Aerodrome with an Instrument approach, it is good Threat and Error management (TEM) to call up the aerodrome incase the procedure is being flown. How will pilots know to contact Shoreham, and who do they call when Shoreham is closed?

Limitations of Shoreham Air Traffic and Air Ground Service

Note however that Shoreham over the previous year have been unable to provide full ATC on numerous occasions (NOTAM'd) downgrading to Air/Ground and on some occasions closing the airfield due insufficient staff. Provision should be made to allow Shoreham A/G Service to provide information as to the status of the PinS Instrument Approach to transiting (and outbound) traffic. The terms of operating an Air/Ground license, you will be aware that information that can be passed is limited and thus this should be considered.

Shoreham Hours of operation

In the Summer months, Shoreham closes “early” and often pilots transiting past shoreham will make blind calls on the frequency. As the PinS approach will be active when shoreham is closed, what mitigation will you put in place to ensure VFR pilots transiting the vicinity can be made aware of a helicopter flying the approach, for training/emergency? We would expect VFR charting to contain relevant frequency and also for a NOTAM to be issued to promulgate the information at this position.

Vicinity of Shoreham VRPs

Brighton Marina is a VRP for Shoreham. This is shown clearly on the CAA 1:250k and 1:500k Charts but on your VFR chart provided, it is however not shown.

As the Marina is a VRP, CAA policy is “Pilots should as far as practicable avoid direct overflight of a VRP”. Accordingly this will place aircraft directly in the location of the PinS approach points and descending helicopters. Has any mitigation been designed into the approach, to reduce the likelihood of a mid air collision with an aircraft recovering to Shoreham, in poor or worsening conditions, at or near Brighton Marina VRP?

ADSB and FLARM

A large proportion of operators that fly from Deanland have ADSB Out/In capability as well as traditional Mode A/C/S Transponders, in many cases. Some older non electrical system equip aircraft operators, and those without ADSB capable transponders, also take advantage of the CAA CAP1391 device. A smaller number also have FLARM in capability. Serious consideration should be given that aircraft flying the approach must have ADSB in/out EC capability for enhanced situational awareness and collision avoidance in low cloud base conditions over the sea. In addition, when practice/training approaches are being flown, VFR traffic in VMC will be higher and aircraft types much more varied (Paragliders/Hang Gliders).

Strobes and Landing/Conspicuity Lighting

No mention is made of KSSAA aircraft being required to operate with conspicuity lighting when flying the approach or missed approach. We would suggest this might be included as a requirement, to make the aircraft more visible to VFR traffic, once cloud break has been achieved. Perhaps better still if it is possible to fly the A109 in clouds with the strobes and lights on, then this could be mandated as part of the approach to keep workload on cloudbreak reduced.

Charting used in the consultation materials

We are a little surprised that SAS have chosen to use an unregulated charting application to show Impact on other users, rather than use the CAA Charts from the regulator, (such as 1:250k South E), although a CAA chart does seem to be shown on a later page.

Swanborough Farm and Truleigh Farm

It is stated in the consultation materials that Swanborough Farm and Truleigh Farm are gliding Sites.

This is most certainly not correct and this may be because of the use of unregulated charting imagery. Swanborough Farm and Truleigh Farm are airfields and there is no gliding taking place at these sites. The significant local gliding site is Ringmer.

Devils Dyke Hanglider Site

This site is not mentioned at all in the consultation materials, but is shown on the VFR charting and is also featured within ENR 5.5 of the AIP. This site has winch launch permission which does climb to a significant height when operational (AIP entry SFC – 2666 AMSL). Certainly the presence of this site should be included within any operational materials produced for the PinS approaches and should be considered in terms of routing. The BHPA may be able to provide you contact information.

Paragliding Activity

With favourable wind conditions there is significant paragliding activity from Mount Caburn and Firle Beacon which are both to the north of the ICAR1 IAF / BT704. Many of the Paragliders operate with FLARM technology only. Note also we do not only see them just on clear summer days near these sites, they also transit along the ridges. Consideration should be given to FLARM equipage of the Air Ambulance to allow situational awareness of other

EC traffic, including paragliders from known sites, as well as paragliders that are known to transit the coastline along the clifftops in strong southerly wind conditions.

Departure route feedback as requested

The procedure as shown overlayed on the CAA VFR 1:250k chart in Green (East Brighton park) departure route appears to parallel the Coast Road until it transits the built up areas of Rottingdean and Saltdean, before clearing the coastline over the sea off Peacehaven. Its not clear what height above the built up area this route will be, but looking at the other charts showing the procedure, it commences BT703 at 700ft AMSL Min north of the Marina to BT702 at 1500ft AMSL off Newhaven. The coastline along that section is between 250FT-300FT AMSL, meaning flight will be at 400ft AGL in the earlier stages. Except when necessary for take-off or landing, an aircraft should be 1,000 ft over a built-up area or otherwise 500ft from people, vehicles, vessels and structures – so we are concerned that the routing of this departure while over the land, is somewhat low.

The Red Routing is over the sea and mirrors the approach.

The alternative routing (dotted lines as shown) are to us quite acceptable in so far as the altitude of the aircraft is sufficient to transit the high ground on this route northbound, of note is that Ringmer and Parham Gliding aircraft often Ridge Soar in favourable conditions east west along the ridge of the downs and when the cloud base is not necessarily that high.

Feathers on Charts and ENR 1.5

We acknowledge the intension to display “feathers” on the chart to denote the existence of an instrument approach to the VFR pilot on VFR regulated (and unregulated) charting. The main question for us is how does the pilot know who to contact, in order to understand if the freathered approach is active?

When Shoreham is closed or not operational, there will be no “service” available.

ENR 1.5 4.2 covers the feathers and makes only mention of “Aerodromes outside controlled airspace”. The feathers are designed to allow VFR flights to avoid IFR traffic at aerodromes. Any changes to the portrayal of Feathers and what they mean, certainly would require some form of education to VFR Pilots and instructors via a TrainingCom from the CAA, that this is now different and in the interests of safety what the best course of action is. We see no mention of this in the documentation provided.

Thank you for the opportunity to respond to the PowerPoint document sent to us in December. We do hope the above information provides you with further information and will ultimately promote a safe to operate PinS Instrument approach to the Hospital in Brighton.

From: ACP-RSCH ACP-RSCH@specialist-aviation.com
Subject: FW: Airspace Change Proposal - Reply Requested
Date: 14 December 2023 at 12:34
To: [REDACTED]

A



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From: office@southdowngliding.co.uk
Sent: 14 December 2023 12:27:55 (UTC+00:00) Dublin, Edinburgh, Lisbon, London
To: ACP-RSCH
Subject: RE: Airspace Change Proposal - Reply Requested

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Hi [REDACTED]

I have forwarded this email to the airspace officer.

Kind Regards

[REDACTED]

Office
Southdown Gliding Club
01903 742137



From: ACP-RSCH <ACP-RSCH@specialist-aviation.com>
Sent: Thursday, December 14, 2023 12:12 PM
To: office@southdowngliding.co.uk
Subject: Fw: Airspace Change Proposal - Reply Requested

Hello

We just spoke on the phone and I'm forwarding you the consultation material that I mentioned referred to.

Could you reply to let me know you received this OK?



Air Traffic Services
Main Terminal Building
Brighton City Airport
Shoreham-by-Sea
West Sussex
BN43 5FF
Tel. 01273 467377
airtraffic@flybrighton.com

Wednesday, 03 January 2024

**Ref: ACP-2023-028 Royal Sussex County Hospital (RSCH) –
Provision of PinS Instrument Approach and Departure Procedures**


Brighton City Airport Ltd welcomes the opportunity to comment on the referenced ACP. We are supportive of the Sponsor's proposal and would like to make the following comments:

1. We seek assurance from the sponsor that the vertical element of the proposed Missed Approach Procedure of the proposed PINS IFP does not impact the existing SHM NDB holding procedure at Shoreham. A suggestion to further deconflict the two procedures is that any missed approach from the hospital pad should initially not be above 1000ft QNH and, upon reaching that altitude maintain level flight until established on track towards BTM02, and then climb as required.
2. Letter of Agreement (LOA). A comprehensive LOA should be established in regards to airspace arrangements and potential provision of ATS by Shoreham to participating IFR traffic.
3. As Shoreham operates both ATC and AGCS, consideration needs to be given to how standard operating procedures could be applied during periods of AGCS.
4. Shoreham ATC receives regular noise complaints from the Saltdean area, particularly in the summer months, about low overflying GA traffic. Consequently, we suggest that the local community should be engaged to explain the procedures associated with IFR operations at the hospital, particularly the proposed auxiliary departure routing.
5. Page 10 of the proposal. The diagram suggests there is the potential for conflicting tracks in Class G airspace between an aircraft flying a Shoreham Rwy 20 IFP via NITEN at 2200ft from an easterly direction, and an IFR departure northbound from the hospital pad at 2300ft. This needs further discussion and review. However, it is noted that the likelihood of this event occurring, based on the estimated number of anticipated IFR operations, is very low.
6. Page 15 of the proposal. London Flight Information Service at Swanwick (NATS) should be considered as an interested party due to transit aircraft that frequently work London Information in the area where the proposed IFP is located, around Brighton and Seaford VOR.

Yours sincerely,

[Redacted signature block]

[Redacted contact information block]

From: ACP-RSCH ACP-RSCH@specialist-aviation.com 
Subject: RE: Airspace Change Proposal - Reply Requested
Date: 21 December 2023 at 08:42
To:
Cc: [REDACTED]
[REDACTED]

A

Dear [REDACTED]

Many thanks for your response to ACP-2023-028 relating to Point-in-space helicopter procedures to Brighton Hospital. Please accept my apologies for the delay in responding as I've been out of the country. I would like to try to address the two points raised.

Point 1 - The safety case is still being developed in parallel with this ACP application, and will be presented to the CAA for their review and approval decision at the ACP stage 4 submission. The specific issue you quote, as we identified and raised in the assessment meeting, relates to mitigating mid-air collision during the transient transition from IMC to VMC outside controlled airspace, where there could be other aircraft operating VFR beneath the cloud base. This is an existing risk wherever an instrument approach is implemented in Class G airspace where VFR aircraft could be present i.e. Gloucester, Exeter, Oxford, Lydd, Biggin Hill, Kemble, Humberside, Cambridge, Walney, Dundee, Inverness, Wick, Lands' End, St Mary's, Shoreham etc. Many of these are non-radar equipped and similarly subject to coastal VFR traffic. This is a risk which will need to be considered and mitigated in every application under CAA CAP2520 for a Point-in-Space approach in Class G airspace. One of the primary reasons our ACP survey asks local airport and airspace users to give feedback on the weather conditions they operate in, their typical volume of traffic, and any transponder/electronic-conspicuity they are equipped with, is to generate quantitative data to aid with ensuring the mitigations we implement are effective and proportionate noting the instrument approach is only expected to be used at a very low volume, less than once per week on average. There are a number of safety mitigations under consideration. A key aim of all mitigations is that they are effective in preventing MAC, but do not restrict airspace users from exercising their existing rights to use the local Class G airspace. Some of the mitigations under consideration are;

1. The use of the instrument procedure only when the weather is below certain thresholds, during which the majority of local GA traffic is unlikely to be operating.
2. The extension of the Shoreham FID system to provide ATC awareness of all transponder/EC equipped traffic operating in the vicinity of Brighton.
3. 'Feathers' on the VFR chart to alert other airspace users of the presence of an instrument approach procedure in this locality.
4. An LOA with Shoreham Airport under which our PinS instrument traffic will always maintain 2-way communication with Shoreham during operating hours, with whom other radio equipped local traffic are likely to be in communication. Outside Shoreham's operating hours blind calls will be made on their frequency.
5. The procedure has been designed to avoid the nominated areas of gliding and paragliding where non-radio traffic are most likely to be present in volume.
6. The only aircraft permitted and database-equipped to fly the PinS approach to Brighton are 'blue light services' – our aircraft are fitted with Mode S transponders, TCAS II, and Sky Echo 2, and are likely to be aware of and able to avoid a significant majority of other transponder/EC equipped aircraft.
7. Often the use of the procedures will be by night where the HEMS weather minima increase notably making crossing the south downs terrain under existing VFR more problematic, and preventing hospital access by air to our patients. At night a very low volume of GA traffic are likely to be operating low level over water.

These mitigations are not exhaustive. The intent of the ACP survey feedback is to further tailor the safety case mitigations to ensure they are targeted, proportional and effective in mitigating the risks.

Point 2 – one of our key design principles is that the implementation of these PinS procedures to Brighton Hospital must minimise the negative impact on other airspace users. Early on it was decided that our starting position is that it would be disproportionate for a procedure with an estimated use of less than 1 time per week to require the implementation of an RMZ or TMZ which could significantly restrict the access to other non-radio and non-transponder equipped aircraft. No other small airport with a GNSS procedure outside controlled airspace has a dedicated RMZ/TMZ, and the likes of Biggin Hill see over 100 movements per day. It was confirmed during the CAA assessment meeting that our expectations are aligned with the CAA in this regard, with neither seeing a case for the implementation of a dedicated RMZ/TMZ, and that in any case the implementation of an RMZ/TMZ would fall outside the scope of the CAP1616 level 1 scaled ACP which we are progressing. As such, there is no intent, or facility, for this ACP to implement an RMZ/TMZ. Our safety case which will be subject to the approval of the CAA will be

predicated on providing sufficient safety mitigations within the existing 'open' Class G airspace structure without any RMT/TMZ.

I hope this provides some clarity in response to the points you raise, and gives you some confidence that we are focussing on mitigating the risks of IFR flight in Class G, and minimising the impact on other GA airspace users. If you have any remaining specific concerns which have not been identified above as existing focal points of our safety case, and which we may benefit from considering, we would be really grateful for your further feedback.

Yours

[REDACTED]
Specialist Aviation Services

[REDACTED]
Head of Training

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From: [REDACTED] <Prog.Man@gaalliance.org.uk>
Sent: 10 December 2023 20:09
To: ACP-RSCH <ACP-RSCH@specialist-aviation.com>
Subject: RE: Airspace Change Proposal - Reply Requested

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Hi,

Many thanks for the attached ACP engagement document.

Please can we be provided with the following, without which we will not be able to give the proposal a meaningful consideration:

1. We note that in your presentation to the CAA Assessment Meeting on 15Jun2023 you state, "Potential issues: Main significant hazard is likely to be VFR traffic following the coast (safety case needs to adequately mitigate this)"
Please provide full details of the safety case mitigating this stated potential issue.
2. We further note that in your presentation to the CAA Assessment Meeting on 15Jun2023 you state, "Negative impact on other airspace users if RMZ /TMZ deemed necessary in Class G"
Please provide full details of the assessment of all aspects has been carried out and that resulted in it being decided that there is no need for any RMZ or TMZ as part of this proposal.

Regards

[REDACTED]