



DFS Deutsche Flugsicherung

IFR Pilot Info 02/2024

High speed below FL100

In general, a speed limit of 250 KIAS applies below FL100 in the Federal Republic of Germany. The exception is airspace Class C, where speeds higher than 250 KIAS are permitted below FL100. In airspace Class C, all aircraft (including VFR) are known to the controller. In airspace Class C, IFR separation values also apply to the separation of VFR traffic from IFR traffic.

Article 2 (28 and 29) of Commission Implementing Regulation (EU) No 923/2012 (SERA) lays down:

28. Air traffic control (ATC) clearance means authorisation for an aircraft to proceed under conditions specified by an air traffic control unit;

29. Air traffic control instruction means directives issued by air traffic control for the purpose of requiring a pilot to take a specific action;

This means that the descent rates and speeds assigned by ATC must be complied with (see also IFR Pilot Info 02/2023).

- If the controller issues a clearance for an altitude below FL100 and assigns a rate of descent (usually for reasons of separation) that does not allow the speed to be reduced to below 250 KIAS, it is ensured that the flight continues to fly in protected airspace Class C and a speed greater than 250 KIAS is taken into account.
- If a controller confirms "high speed approved" to an approaching aircraft below FL100, it is ensured that the traffic density is so low that the TCAS requirements regarding the alert time are met.

In many cases, we have found that pilots very often fail to report to the controller when an instructed descent rate cannot be maintained and reduce the descent rate shortly before passing FL100 in order to reduce the speed to 250 KIAS.

We are aware of the airline's regulations regarding speeds of 250 KIAS below FL100. This reduction below FL100 in airspace Class C is not required according to EU regulations (SERA). In addition, the complex tactical traffic planning on the radar screen is made more difficult and additional work is generated by the need for renewed coordination (increase in air traffic control instructions).

In order to be able to maintain the capacity values at a high level, especially in the TMAs, we urgently request compliance with the given clearances regarding descent rates and the avoidance of independent speed reduction to 250 KIAS.

If the assigned descent rates or speeds cannot be maintained, ATC must be informed immediately.