



## **ACCEPTABLE MEANS OF COMPLIANCE**

### **AMC-47**

## **ICAO THREE LETTER DESIGNATOR (3LD) AND RADIO TELEPHONY DESIGNATOR**

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***GUIDANCE REGARDING THE SELECTION AND APPLICATION OF THREE LETTER  
DESIGNATORS (3LD) AND RADIO TELEPHONY DESIGNATORS AND CALL SIGNS FOR UAE  
AIR OPERATORS***

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## 1 RECORD OF ISSUES AND DATE OF APPLICABILITY

Issue. No	Date of issue and date of Applicability
previous issues	Refer to CAAP-47 issue 01 in the archive
Issue 02	Date of issue 08 November 2020 Date of applicability 08 November 2020
Issue 03	Date of issue 01 <sup>st</sup> February 2021 Date of applicability 01 <sup>st</sup> February 2021



## 2 HIGHLIGHTS OF CHANGES

Issue 02	<ol style="list-style-type: none"><li>1. Flow process added to 7.RULES FOR REGISTRATION OR CHANGE OF DESIGNATOR</li><li>2. Change of the type of the publication from CAAP to AMC</li></ol>
Issue 03	Editorial errors fixed



## TABLE OF CONTENT

1	RECORD OF ISSUES AND DATE OF APPLICABILITY .....	2
2	HIGHLIGHTS OF CHANGES .....	3
3	PURPOSE.....	5
4	LEGISLATION .....	5
4.1	ICAO Provisions.....	5
4.2	RELATED REGULATOR REFERENCES .....	6
5	STATUS OF THIS AMC .....	6
6	APPLICABILITY.....	6
7	RULES FOR REGISTRATION OR CHANGE OF DESIGNATOR .....	6
7.1	Three-letter designators applicability .....	7
7.1.1	Selecting 3LD .....	7
7.1.2	Use of three letter .....	8
7.1.3	Restrictions of 3LDs .....	8
7.2	Radio Telephony designators .....	8
7.2.1	Call sign.....	8
7.2.2	Call sign general rules.....	9
7.2.3	Conflicting call sign .....	9
7.2.4	Flight Number Assignment .....	10
7.3	Use of Call sign or Radio Telephony designators within UAE Operator .....	10
7.3.1	Use of UAE operator call sign .....	10
7.3.2	Use of UAE operator call sign on Foreign Aircraft.....	10
	ICAO Three Letter Designators and Radio Telephony Designator application procedures .....	12



### 3 PURPOSE

Radio telephony communication plays an important role in the aviation safety. The need to identify each station unambiguously resulted in the assignment of distinct “code words” for aircraft operating agencies, their “telephony designator”. With an increasing number of such agencies, ICAO needed to coordinate the choice of the designators to assure that there is little similarity. Eventually abbreviated designators – initially two letters, now three – were introduced additionally to facilitate data communication, which at that time was still via teletypewriters. The more traffic, more compliance with communication procedures and phraseology is required to maintain brief and effective communications.

As per ICAO Doc 8585 recommendations, States should review periodically all designators and associated information. The GCAA found that many operators do not comply with ICAO Standards and Recommended Practices (SARPs) particularly on radio telephony designators. In order to enhance safety and to reduce communication congestion, operators are urged to review those guidelines for their initial application of a radio telephony designator and should consider to change their existing radio telephony designator and/or call sign when communication congestions or ambiguity (call sign confusion) have been identified.

This AMC details UAE requirements for air operators to use a Radio Telephony Designator and provides guidance on how to make an application for a new or amendment of an existing radiotelephony designator for aircraft operating agencies and the corresponding Three Letter Designator (3LD) through the ICAO online services.

### 4 LEGISLATION

#### 4.1 ICAO Provisions

ICAO SARPs in ICAO Annex 10, Volume II inherently require that aircraft use a distinct radiotelephony call sign in aeronautical communications. The call sign can be

- Type a) — the characters corresponding to the registration marking of the aircraft; or
- Type b) — the telephony designator of the aircraft operating agency, followed by the last four characters of the registration marking of the aircraft;
- Type c) — the telephony designator of the aircraft operating agency, followed by the flight identification.

The telephony designators referred to in Types b) and c) are published periodically in ICAO Doc 8585 — Designators for Aircraft Operating Agencies, Aeronautical Authorities and Services.

Any of the foregoing call sign types may be inserted in field 7 of the ICAO flight plan as the aircraft identification. However, due to the limitation of field 7 to seven alphanumeric characters (see Appendix 2 of ICAO Doc 4444 – PANS-ATM), the telephony designator of the aircraft operating agency has to be represented by a three-letter code (3LD), and radio



telephony designator may be inserted in field 18: Other information with the following information: OPR/ Operator name / radio telephony designator (if exist).

#### **4.2 RELATED REGULATOR REFERENCES**

ICAO Annex 10 Vol II Communication Procedures

ICAO doc 9432 Manual of Radiotelephony

AMC 69 Radiotelephony Standards.

### **5 STATUS OF THIS AMC**

ISSUE 3 of AMC 47 is valid from 01<sup>st</sup> February 2021.

### **6 APPLICABILITY**

This publication is applicable to: Air operators, organizations that are involved in aviation operations, and government organizations, including those operating State Aircraft or military aircraft.

The use of a 3LD and the Radiotelephony Designator / call sign is mandatory for scheduled operations and recommended to Non Scheduled Air Transport operators / AOC holder who operate more than three aircraft commercially and optional for other operators including Private operators, Government and other organizations.

Non Scheduled Air Transport operators who do not intend to operate multiple aircraft may still operate, however only using their aircraft registrations or tail number (for state / military aircraft) as a call sign and as flight identification in the ATS flight plan.

### **7 RULES FOR REGISTRATION OR CHANGE OF DESIGNATOR**

ICAO introduced in November 2014 an online system for managing radiotelephony designators and Three Letter Designators (3LD). The 3LD request system allows airlines to request designators themselves directly, and have those requests automatically forwarded to the 3LD Focal Points assigned by each State. An airline can click on Request New Designator (under Industry), purchase a PIN, and fill in the form with their suggestions for a Three-letter and Telephony designator, before submitting the request.

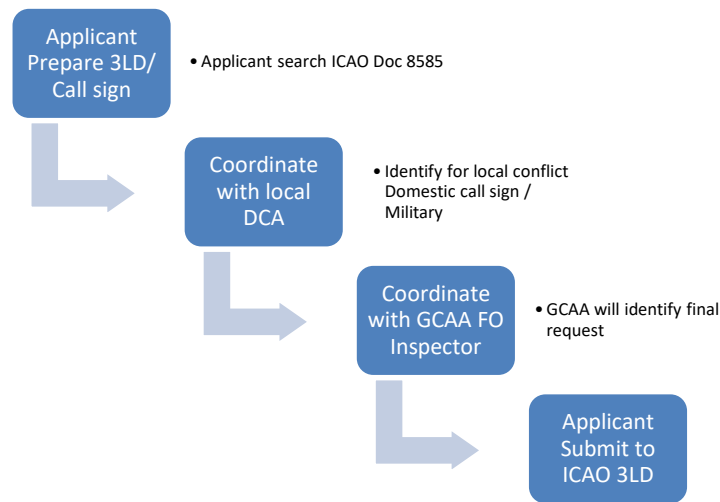
The State focal point then receives each new request for review and approval online. The focal point can then forward the request to ICAO to assign the designators by a click of a button. The request is reviewed through ICAO ATM and OPS experts, helping to achieve global suitability and non-duplication of designators. Once assigned, the request follows the reverse path back to the requesting airline.

The transition to an online system provided the states and the operators with the ability to trace the



designator requests online.

3LD and Call sign request process flow



## 7.1 Three-letter designators applicability

The three letter designators are intended for use on the international aeronautical telecommunications service. It may be used following the Location Indicator as the fifth, sixth and seventh letters of Addressee Indicators followed by the filler letter "X", or by a letter representing a department or division within the organization addressed for AFTN message (see also annex 10)

Three letter designator may be used by UAE operators, UAE government and ground handling agent services (Flight Operations related) see AMC 46 on Ground Handling Agent

The three-letter designator may also be used in the aircraft identification as used in the Flight Plan and associated messages (see PANS-ATM, Doc 4444).

### 7.1.1 Selecting 3LD

- A three-letter designator should reflect to the maximum extent practicable, the name of the aircraft operating agency or its telephony designator, or the aeronautical service for which it is requested.
- Designators for governmental organizations which provide civil aviation facilities and services are allocated only in the Y series.
- Designators for governmental organizations which provide air traffic services are allocated only in the Z series (except ZX A to ZX Z).
- The following designators are reserved for national allocation by GCAA to national



authorities and services and will not be used for other assignments by ICAO. The State may select and use any of those without referring the matter to ICAO: YEY, YGY, YHY, YIY, YJY, YKY, YQY, YRY, YUY, YVY and ZXA to ZXZ groups.

### 7.1.2 Use of three letter

The following three-letter designators when appearing in the Shortened Address, the Address and/ or in the Origin parts of an AFTN message, must be complemented with further identification of the aircraft operating agency, aeronautical authority or service concerned, in the beginning of the Text part of the message

YXY - Military Service or organization

YYY - Aircraft operating agencies and organizations not allocated a three-letter ICAO designator on an exclusive basis

ZZZ - Aircraft in flight

### 7.1.3 Restrictions of 3LDs

In the registration of three-letter designators the following restrictions will apply:

- a) to avoid conflict with the AFTN Start-of-Message Signal, combinations with CZ or ZC will not be used;
- b) to avoid conflict with the AFTN End-of-Message Signal, combinations with NN will not be used;
- c) PAN and SOS will not be assigned;
- d) to avoid confusion with communications service codes, the following three-letter combinations should not be used: QTA and SVC
- e) to avoid potential AFTN routing problems:
  - i. no further allocation of aircraft operating agency designators will be included in the Y and Z series; and
  - ii. No further allocation of any designators will be included in the Y series and **ZAA** to ZIZ, ZOA to ZUZ and ZYA to ZZY groups.

## 7.2 Radio Telephony designators

ICAO will assure that the radio telephony designators and three letter designators are not conflicting.

### 7.2.1 Call sign

Telephony designators for aircraft operating agencies may be used as part of the aircraft



radiotelephony call sign followed by the flight identification in radiotelephony communications, in accordance with the ICAO Radiotelephony Procedures (Annex 10, Volume II, 5.2.1.7.2 refers). Example: "Airorvx 305".

### 7.2.2 Call sign general rules

- a) The telephony designator should resemble the name of the aircraft operating agency or its function and be distinct and dissimilar from any other telephony designators in Doc 8585. Ideally it should reflect correlation between the three-letter designator, the telephony designator and the name of the aircraft operating agency or its function (examples: FRP - FREEPORT- Freeport International Airlines); however, other similar replacement may be used if no available meaningful words,
- b) In order to reduce the length of transmission the telephony designator should be brief, comprising if possible one word of two or three syllables that is meaningful. It should not exceed two words and should not exceed four syllables if the applicant cannot find meaningful three syllables.
- c) Three letter designators should not be used in phonetic form as telephony designators.

However, telephony designators that are too long (such as those for KLM or TWA) may be retained, provided that an acceptable alphabetic representation is used (example: KAY-ELL-EMM); similarly any radio telephony designator which would lead to ambiguity with other call signs or widely used abbreviations shall be avoided, such as VOR, NDB.

- d) The telephony designator should be easily and phonetically pronounceable in English.

### 7.2.3 Conflicting call sign

Any air operator, AFTN, ATC or aviation organization that is involved in communications may recommend to the GCAA to propose changes if the call sign is either: difficult to pronounce, too long, similarity found or may conflict with the safety of the flight.

For example: Cargofax encounter another similar call sign e.g. cargoflight, the operator shall immediately notify GCAA that the call-sign may create ambiguity, and may request changes or propose changes to other appropriate call-sign to ICAO.

The following words should be avoided in assigning radiotelephony designators: Taxi, Fly, Climb, lower, higher, any number or similar words that are used in the communication in air traffic services as they may create ambiguity. In addition, any radio station call sign, city name or region / FIR name shall be avoided.

To avoid conflicting 3LD and or call sign, organisation that is using other than ICAO 3LD and or Radio Telephony designation for the purpose of domestic flight or within the FIR



shall address to the Emirates Air Navigation Service Providers and notification to the GCAA, these callsign shall not be used for international Air Navigation purposes.

#### **7.2.4 Flight Number Assignment**

GCAA recommend the following flight number assignment

- a) Flight numbers should be kept as short as possible, ideally two number, and limited to three figures; in some special condition it may be extended to four figures.
- b) Flight numbers should be selected bearing in mind the flight numbers already in use by other operating agencies in the intended control environments; and
- c) When practicable flight numbers ending in a zero or five should be avoided.
- d) To reduce frequency congestion, the zero prefix should not be pronounced, for example Emirates 008 should be called “Emirates Eight”, or Etihad 05 should be called “Etihad Five”.

### **7.3 Use of Call sign or Radio Telephony designators within UAE Operator**

The Radio Telephony designators or a call sign is not transferable between one state member to another state member as it may have further implication on safety such as traffic arrangement, separations, interpretations or establishment of visual contact (logo vs call sign confusion). Additionally there will also be security impact particularly on other member state. Therefore the use of call-signs are regulated by UAE GCAA

#### **7.3.1 Use of UAE operator call sign**

The UAE air operator (UAE AOC Holder) may use another UAE (UAE AOC Holder) to cover AOG or short notice requirement on replacement aircraft as one off (this shall not exceed 5 days), for periodic / frequent use of call sign, the these operator shall request to UAE GCAA no objections using call sign within 5 days of the commencement of the operations. The Flight operations Inspector will review the contract agreement between those operators including type of lease (Wet Damp or Dry) as well as insurance coverage. Upon satisfactory on document review, the GCAA Flight Operations Inspector will prepare Letter of No Objections.

#### **7.3.2 Use of UAE operator call sign on Foreign Aircraft**

The AOC and Operations Specifications is the Legal document that is issued by General Civil Aviation Authority for Commercial Air Transport operators. The Operations Specifications describes the Area of operations, Type of Aircraft, Operational /



Navigation authorizations (e.g. Low Visibility, RVSM, etc.), and wet leased aircraft. This authorizes the Foreign Operator to use an UAE AOC call sign for foreign registered aircraft. There may be a case where the arriving aircraft enters UAE Airspace with a foreign call sign (e.g. flight bound from USA may use their call sign or N (November registered) call sign, and during departure, carrying UAE Operator / lessor, the lessee may use UAE Operator call sign.

Unless it is specified in the Operations Specifications or authorized by the GCAA Flight Operations, no operator shall use any other call sign from another state without GCAA approval unless in accordance with CAROPS 1 / 3.165 par d.



## Appendix to AMC 47 RADIO TELEPHONY DESIGNATORS AND 3LD

### ICAO Three Letter Designators and Radio Telephony Designator application procedures

1. It is recommended that an applicant for a Radiotelephony Designator or 3LD, reviews thoroughly the ICAO Doc 8585 which is available on-line. (see also <http://www4.icao.int/3LD> which includes video instructions).
2. To contact the Principal Flight Operations Inspector or mail [fops@gcaa.ae](mailto:fops@gcaa.ae) to establish initial contact regarding the 3 options proposed for three 3LD and radio telephony designator to avoid rejection from ICAO. Once acceptance has been obtained from the Principal Flight Operations Inspector, the following ICAO procedures to be followed. Review availability of 3LD or Radiotelephony on ICAO doc 8585
3. Go to <http://www4.icao.int/3LD>.
4. Review carefully the guidance provided for the application process.
5. Go to the store <http://store1.icao.int/index.php/catalogsearch/result/?q=3LD>.
6. Create Account.
7. Buy the appropriate PIN.
8. Fill and submit the appropriate request form.

### Step by Step Illustrated Guide from ICAO 3LD

Note: This guide may not be updated, it is provided as guided illustration

3 LD process flow for industry and State (GCAA)

1. Once GCAA have reviewed your application
2. (Industry) Purchase pin
3. (State) Fill 3LD form and click SUBMIT
4. (State) Click Online Tracking to review Pending Request
5. (State) For valid pending request: submit to ICAO
6. (State) click to view status request
7. (Industry) click to view status request

In the BUY PIN page you can buy three products for 3LD:

1. New Designation
2. Modify Designation
3. Purchase 3LD Confirmation Letter



### CAUTION

After selecting 3 Letter designation, do not forget to tick YES in Radio telephony

If you DID NOT select YES in Radio telephony, you may have to **buy PIN again**.



STEP 1 Go To <http://www4.icao.int/3LD> then BUY PIN

INTERNATIONAL CIVIL AVIATION ORGANIZATION  
A United Nations Specialized Agency

ADMIN ONLINE STORE

THREE LETTER & TELEPHONY DESIGNATORS HOME PROCESS FEES CONTACT FAQ SIGN OUT

3LD  
Three Letter & Telephony Designators.

3LD Process

Industry Industry State State State Industry

1 → 2 → 3 → 4 → 5 → 6 → ✓

PURCHASE PIN UNDER INDUSTRY [CLICK HERE TO PURCHASE A PIN](#)

**States**  
DOC #585  
ONLINE STEP-BY-STEP VIDEO  
ONLINE-TRACKING

**Industry**  
3LD FORMS  
CONFIRMATION LETTER  
**DOC #585**  
ONLINE-TRACKING



## OR DIRECTLY GO TO ICAO STORE

<http://store1.icao.int/index.php/catalogsearch/result/?q=3LD> to BUY PIN

The screenshot shows the ICAO Online Store interface. At the top, the ICAO logo and name are displayed, along with a search bar containing '3LD' and a 'Search' button. Below the search bar, there are navigation links for 'My Account', 'My Wishlist', 'My Cart', 'Checkout', and 'Log In'. The main content area shows search results for '3LD', with 3 items listed. Each item has a thumbnail image, a title, a price, and 'Add to Cart' and 'Add to Wishlist' buttons. The items are: '3LD and Telephony Designator - New Request (3LDNR) - DIGITAL' for USD 4,000.00; '3LD - Modify Code (3LDMC) - DIGITAL' for USD 3,000.00; and '3LD Confirmation letter (3LDCL) - ENGLISH - DIGITAL' for USD 50.00. On the left side, there are filters for 'Categories' (Publications, Online Products / CD, Training, Performance Based Navigation (PBN), Clearance Sale 2014!) and 'Shop By' (Document / Product Type, On Line (3), Format Type, Digital Format (3), Language, English (3)). On the right side, there are sections for 'My Cart' (0 items), 'Recently Viewed Products' (3LD and Telephony Designator - New Request (3LDNR) - DIGITAL), and 'Newsletter Sign Up' (ICAO E-MAIL NEWSLETTERS, Sign up).



**STEP 2. GO TO THE FORM (FROM FOOTER)**

**3LD Process**

Industry Industry State State State Industry

1 → 2 → 3 → 4 → 5 → 6 → ✓

FOR A VALID PENDING REQUEST SUBMIT TO ICAO FOR APPROVAL

**States**  
DOC 8585  
ONLINE STEP-BY-STEP VIDEO  
ONLINE TRACKING

**Industry**  
3LD FORMS  
• REQUEST NEW DESIGNATOR  
• MODIFY EXISTING DESIGNATOR  
• MODIFY AGENCY NAME  
CONFIRMATION LETTER  
DOC 8585

**Industry**

[3LD Forms](#)

- [Request New Designator](#)
- [Modify Existing Designator](#)
- [Modify Agency Name](#)

[Confirmation Letter](#)



Or directly to <http://www4.icao.int/3LD/Form/New>

Fill in Three Letter designation,

Tick **YES** (else, you have to buy PIN again) in Telephony Designator, Fill then SUBMIT button

The screenshot shows the 'New Designator Form' on the ICAO website. The form is divided into several sections:

- New Designator Details:** Includes fields for Agency Name, Three Letter Designator (with three options: Option 1, Option 2, Option 3), and Telephony Designator (with three options: Option 1, Option 2, Option 3). There are also fields for AOC Number and PIN.
- Instructions:** A text box providing detailed instructions on how to fill out the form, including a note to visit the online store to purchase a PIN.
- Your Contact Information:** Includes fields for Title, First Name, Last Name, Email, and Phone.
- State Focal Point(s):** Includes a dropdown menu to select the State.

At the bottom of the form, there are two buttons: 'Submit to Focal Point' and 'Cancel'.



### STEP 3. REVIEW YOUR REQUEST

THREE LETTER & TELEPHONY DESIGNATORS [HOME](#) [PROCESS](#) [FEES](#) [CONTACT](#) [FAQ](#) [RULES](#) [SIGN OUT](#)

## Review New Designator Request

Please review your request before submission:

**From**

Agency	
Agency Name	Always Airline
AOC Number	-

Contact Information	
Name	Mrs. Allisun SMITH
Email	allisun.smith@ala.com
Phone	
Department	

**To**

Member State
Mexico

**Designator Details**

Three Letter Designator	
Option 1	ALA

Telephony Designator
Will be requested later.

**Tracking**

PIN
oizz0vi4cr325t4h2b3ln

[Submit to Focal Point](#) [Cancel](#)



## STEP 4. MAKE SURE YOU SEE CONFIRMATION PAGE

The screenshot displays the ICAO website interface. At the top left is the ICAO logo with the text "INTERNATIONAL CIVIL AVIATION ORGANIZATION" and "A United Nations Specialized Agency". The main navigation bar includes "HOME", "PROCESS", "FEES", "CONTACT", "FAQ", "RULES", and a "SIGN OUT" button. The page title is "THREE LETTER & TELEPHONY DESIGNATORS". A large blue banner reads "Confirmation". Below this, the heading "Thank you for submitting a request" is followed by the text: "The request has been sent to your State for approval. You may download a confirmation document below." A blue button labeled "Download PDF" is provided. A light blue note box contains the text: "Note: If you wish to make changes to this request, please do so by submitting another request using the same PIN before your State submits this request to ICAO." The footer includes links for "Home", "About", and "Contact", along with social media icons for YouTube, Facebook, and Twitter.



## OPTION to see your application status

**Online-Tracking**

Please enter the PIN used to submit the request you would like to track:

[Track](#) [Close](#)

**Process**

Industry Industry State State State Industry

1 → 2 → 3 → 4 → 5 → 6 → ✓

UNDER INDUSTRY CLICK ONLINE-TRACKING TO VIEW STATUS OF REQUEST(S)

**States**

- DOC 8555
- ONLINE STEP-BY-STEP VIDEO
- ONLINE-TRACKING

**Industry**

- 3LD FORMS
- CONFIRMATION LETTER
- DOC 8555
- ONLINE-TRACKING
- BUY PIN

**3LD Benefits**

Global identification and recognition by major industry providers.  
Advantageous to Air Traffic Control Systems.



## GCAA INSPECTOR VIEW

Click to ICAO portal (make sure you are authorised to 3LD application)

Then review pending request

The screenshot shows the ICAO portal interface. At the top, it displays the ICAO logo and the text 'INTERNATIONAL CIVIL AVIATION ORGANIZATION A United Nations Specialized Agency'. Below this, there is a navigation bar with links for 'HOME', 'PROCESS', 'FEES', 'CONTACT', 'FAQ', 'RULES', and a 'SIGN OUT' button. A large blue banner in the center reads 'UAE Pending requests'. Below the banner, there are two tabs: 'Requests Submitted to ICAO' and 'Pending Requests', with the latter being selected. There are also dropdown menus for 'Type: All' and 'Date Submitted: All', and a search box labeled 'Search request...'. A table lists the pending requests:

Agency Name	Request Type	Three Letter Designator	Telephony Designator	Submitted On	Action
Airways Airline	New	Awaiting approval	Will be specified later	31-Oct-2014	<a href="#">View</a>

At the bottom of the page, there are links for 'Home', 'About', and 'Contact', along with social media icons for YouTube, Facebook, and Twitter.



Once accepted, GCAA inspector assigned for 3LD will submit to ICAO

**From**

Agency	
Agency Name	Airways Airline
AOC Number	-

Contact Information	
Name	Mrs. Allisun SMITH
Email	allisun.smith@ala.com
Phone	
Department	

**Request Details**

Request Details	
Type	New Designator
Submitted On	31 October 2014 at 02:22 PM

**Designator Details**

Three Letter Designator	
Option 1	ALA

Telephony Designator	
Will be specified later	

I have reviewed this request and agree that it is valid.     This request cannot be submitted to ICAO at this time.

Home   About   Contact