



20 April 2011

Office of Airspace Regulation
Civil Aviation Safety Authority
GPO Box 2005
CANBERRA ACT 2601

Dear Office of Airspace Regulation,

Context to the Ambidji Group's study on the airspace of 10 Class D Towers

The RAAA and its Members

The Regional Aviation Association of Australia (RAAA) was formed in 1980 as the Regional Airlines Association of Australia to protect, represent and promote the combined interests of its regional airline members and regional aviation throughout Australia.

The Association changed its name in July 2001 to the Regional Aviation Association of Australia and widened its charter to include a range of membership, including regional airlines, charter and aerial work operators, and the businesses that support them.

The RAAA has 27 Ordinary Members (AOC holders) and 56 Associate/Affiliate Members. The RAAA's AOC members directly employ over 5,000 Australians, many in regional areas. On an annual basis, the RAAA's AOC members jointly turnover more than \$1b, carry well in excess of 2 million passengers and move over 23 million kilograms of freight. Annex A lists the Ordinary Members of the RAAA.

RAAA members operate in all States and Territories and include airlines, airports, engineering and flight training companies, finance and insurance companies and government entities. Many of RAAA's members operate successful and growing businesses providing employment and economic sustainability within regional areas.

Some examples of RAAA members' presence in regional Australia is the REX hub in Wagga Wagga, SkyWest in WA, Sharp Aviation in Hamilton, Kimberley Aviation at Broome, Airnorth, Chartair and Vincent Aviation Northern Territory networks, West Wing Aviation in Mt Isa and Skytrans operations from Cairns, to name a few.

Serving regional aviation, and through it, the people and businesses of regional Australia

Unit 11, 26-28 Winchcombe Court, Mitchell ACT 2911

ABN: 23 008 568 054 Telephone: 02 6162 0305 Facsimile: 02 6162 0308 Email: office@raaa.com.au Website: www.raaa.com.au

RAAA Charter

The RAAA's Charter is to promote a safe and viable regional aviation industry. To meet this goal the RAAA:

- promotes the regional aviation industry and its benefits to Australian transport, tourism and the economy among government and regulatory policy makers;
- lobbies on behalf of the regional aviation industry and its members;
- contributes to government and regulatory authority policy processes and formulation to enable its members to have input into policies and decisions that may affect their businesses;
- encourages high standards of professional conduct by its members; and
- provides a forum for formal and informal professional development and information sharing.

The RAAA provides wide representation for the regional aviation industry by direct lobbying of Ministers and senior officials, through parliamentary submissions, personal contact and by ongoing, active participation in a number of consultative forums.

Context to the Ambidji Group's study on the airspace of 10 Class D Towers Response

The Regional Aviation Association of Australia shares the ASTRA Council's concerns at both the report by Ambidji to the Office of Airspace Regulation (OAR) and the Airservices Australia (AsA) implementation plan.

There has been an obvious lack of industry consultation on the implementation front which is clearly remiss given that it is the aviation industry that will pay for any roll-out. It is acknowledged however that OAR is seeking industry comment regarding the Ambidji Report in its own right.

As mentioned in the Ambidji report there does not appear, as yet, to have been a detailed, quantitative detailed safety analysis or cost benefit analysis with respect to any implementation plan.

It is acknowledged that the Ambidji Group was not party to concurrent government documents such as the CASA Report on Ministerial Direction 2004-4 (Radar Direction), CASA's DP on the Plan for Communication, Navigation and Surveillance Equipage, as well as the subsequent implementation plan by AsA. This limits the RAAA's ability or confidence in responding to the Ambidji recommendations.

With the above caveats, the RAAA is generally supportive of Ambidji recommendations 3, 4 and 5.

The RAAA is supportive of the ASTRA critique of the AsA implementation plan. As suggested, the high costs of implementing the proposals at the identified regional locations could threaten some regional routes and be a further challenge to much need regional development.

Regional operators are attempting to redevelop regional routes, plan for ADS-B and Baro-Vnav equipage, as well as organise their finances for fleet renewal. These are already placing heavy burdens on a regional aviation industry that is often barely profitable.

As stated by the ASTRA Council 'the industry's ability to fund the proposed infrastructure and services should not be understated'.

The RAAA supports the ASTRA Council's analysis of each option in the AsA plan including that sufficient time be allowed for the definition of airspace configuration requirements, user comments, design, industry review and implementation.

The RAAA is supportive of the ASTRA view the implementation plan does not 'justify advancing mandatory fitment dates for ADS-B ahead of those contained in ASTRA's response to CASA Discussion Paper 1006AS.'

The RAAA will continue to work with the ASTRA Council to ensure that safe, efficient and cost effective service and surveillance options are made available to regional operators and airports.

If the RAAA can be of any further assistance in this matter please don't hesitate to contact me.

Regards



Paul Tyrrell
Chief Executive Officer

Annex A: RAAA Ordinary Members

