

# DP Response Form

## PROPOSED REGULATORY PLAN IN SUPPORT OF THE AUSTRALIAN GOVERNMENT'S AVIATION WHITE PAPER, DECEMBER 2009

**Please complete your response by 30 November 2010 and return it by one of the following means:**

**Online (preferred method\*)** [casa.gov.au/newrules/ors](http://casa.gov.au/newrules/ors)

**Fax** 1800 653 897 (free call in Australia)

**Post (no stamp required in Australia)**

CASA's Standards Development Branch  
Reply Paid 2005, Canberra ACT 2601, Australia

**E-mail (use the response format in this DP)**

[dp1006as@casa.gov.au](mailto:dp1006as@casa.gov.au)

\* A web-based online response form is offered as an alternative to the printed form in this DP. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type [casa.gov.au/newrules/ors](http://casa.gov.au/newrules/ors) into your web browser and follow the links for this DP.

### Your Details

Please provide relevant information below and indicate your acceptance or otherwise of the options presented in this DP by ticking [✓] the appropriate boxes.

Your name: Paul Tyrrell ARN\* (if known): \_\_\_\_\_

Organisation: Regional Aviation Association of Australia ARN\* (if known): \_\_\_\_\_

\* Aviation Reference Number, usually your CASA-issued licence or certificate number

Address: 11/26-28 Winchcombe Court, Mitchell ACT 2911

Your telephone number (optional): (02) 6162 0305 (to enable the Project Manager to contact you as necessary)

Do you consent to have your name published as a respondent to this DP? YES [✓] NO [ ]

Signed: *Paul a Tyrrell* Date: 17 December 2010

### How are you responding to this questionnaire/proposal, i.e. whose views are represented in your response?

- |   |  |  |   |   |                                |
|---|--|--|---|---|--------------------------------|
| <input type="checkbox"/> Private individual | <input checked="" type="checkbox"/> Aviation Industry body/association | <input type="checkbox"/> Staff association/union | <input type="checkbox"/> Government agency/authority/department/council | <input type="checkbox"/> Aviation business owner/service provider | <input type="checkbox"/> Other |
|---|--|--|---|---|--------------------------------|

### Please advise your main involvement in aviation:

- |   |   |   |   |   |   |
|---|---|---|---|---|---|
| <input type="checkbox"/> Passenger/public consumer of aviation services | <input type="checkbox"/> Air crew for passenger-carrying activities | <input type="checkbox"/> Air crew for non-passenger-carrying activities | <input type="checkbox"/> Ground support for passenger-carrying activities | <input type="checkbox"/> Ground support for non-passenger carrying activities | <input type="checkbox"/> Other (specify below*, e.g. parachutist) |
|---|---|---|---|---|---|

\* **Details:** Aviation Industry Association

### Are you satisfied with CASA's consultation on this issue?

- Very satisfied     Satisfied     No opinion     Dissatisfied     Very Dissatisfied

**Key Options/Issues  
(complete in conjunction with DP Section 3, and Annex A)**

CASA invites you to advise your comments on the subject matter in this DP by indicating your preference by ticking [] the appropriate box and commenting below:

***Overall Strategy and Regulatory Plan***

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments (including an estimate of additional costs/impacts): \_\_\_\_\_

\_\_\_\_\_  
See Attached Submission  
\_\_\_\_\_  
\_\_\_\_\_

***Strategy for Phase 1 -year 2013***

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments (including an estimate of additional costs/impacts): \_\_\_\_\_

\_\_\_\_\_  
See Attached Submission  
\_\_\_\_\_  
\_\_\_\_\_

***Strategy for Phase 2 – year 2015***

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments (including an estimate of additional costs/impacts): \_\_\_\_\_

\_\_\_\_\_  
See Attached Submission  
\_\_\_\_\_  
\_\_\_\_\_

***Strategy for Phase 3 – year 2017***

- proposal is acceptable without change
- changes would improve it, but it is acceptable (please provide details below)
- changes would make it acceptable (please provide details below)
- not acceptable under any circumstances

Comments (including an estimate of additional costs/impacts): \_\_\_\_\_

\_\_\_\_\_  
See Attached Submission  
\_\_\_\_\_  
\_\_\_\_\_

***Strategy for Phase 4 – years 2020 and 2020+***

proposal is acceptable without change

changes would improve it, but it is acceptable (please provide details below)

changes would make it acceptable (please provide details below)

not acceptable under any circumstances

Comments (including an estimate of additional costs/impacts): \_\_\_\_\_

\_\_\_\_\_  
See Attached Submission  
\_\_\_\_\_  
\_\_\_\_\_



17 December 2010

Mr Peter Boyd  
Executive Manager  
Standards Development and Future Technology  
Civil Aviation Safety Authority  
GPO Box 2005  
Canberra ACT 2601

Dear Mr Boyd,

**CASA Discussion Paper 1006as  
Proposed Regulatory Plan in support of  
the Australian Government's Aviation White Paper**

**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 52 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.

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](mailto:office@raaa.com.au) Website: [www.raaa.com.au](http://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.

## **RAAA Response to Discussion Paper**

### **INTRODUCTION**

The RAAA welcomes the opportunity to comment on CASA's Discussion Paper (DP) – Proposed Regulatory Plan in support of the Australian Government's Aviation White Paper, December 2009: Communication, Navigation and Surveillance Equipage in this decade (Document DP 1006AS – October 2010).

The key concern of the RAAA is safe operations and any regulatory and legislative means to achieve enhanced safety outcomes, deemed necessary as a result of robust safety based risk analysis, is welcome.

### **OVERALL STRATEGY**

The RAAA supports CASA's proposed overall strategy, specifically the transition over the period of the decade to:

- a national ground and satellite based CNS/ATM system for civil aviation
- satellite navigation by all IFR capable aircraft
- TCAS fitment requirement for passenger transport aircraft
- Mode S ES transponder capability
- widespread ADS-B OUT capability across the Australian aircraft fleet

## PHASED APPROACH

The RAAA supports the Phased Approach outlined in the DP, Para 4.4 – Phased Implementation of the Strategy over the Decade, and included verbatim following. In particular CASA’s undertaking that “Further analysis of costs, standardized equipment availability and other impacts will be undertaken by CASA at the time of preparation of the NPRM and the necessary Regulation Impact Statement that support such major changes.” It is critical that in moving toward any future legislative outcome this process is robust and consultative.

*“A phased approach over the decade to 2020 will be adopted rather than one “big-bang” change. Four phases, as set out in Table 1 – 5 below for the installation of the necessary aircraft avionics equipage will enable the safety and efficiency issues and priorities to be addressed through concurrent implementation of aircraft and ground based systems within industry resource limitations and allowing for informed decisions on future investments. The extended compliance timing over the whole decade as proposed will also provide the timing for aircraft operators to achieve a reasonable return on current avionics equipage investments. The timing is in keeping with the White Paper’s intent, although final decisions on regulatory scope and timing would be made by CASA after the normal industry consultation and regulatory development processes have been undertaken. Further analysis of costs, standardized equipment availability and other impacts will be undertaken by CASA at the time of preparation of the NPRM and the necessary Regulation Impact Statement that support such major changes.”*

## LIMITING FACTORS

The RAAA supports the main Limiting Factors outlined in the DP, Para 4.5 – Phased Implementation of the Strategy over the Decade, and included verbatim following; in particular “capital outlays” and “the limited capacity of the existing industry specialist manpower”. The RAAA believes it is critical that these limiting factors are considered at all times in any future legislative outcome.

“The main limiting factors are the capital outlays for the Australian aviation industry in equipment procurement and installation of avionics equipment upgrades and the limited capacity of the existing industry specialist manpower to retrofit existing aircraft. There are about 1200 licensed aircraft avionics personnel currently listed in the CASA licensing database, not all of those are actively engaged in the aviation industry at any one point in time. These are the people who are needed to undertake, or at least oversight and supervise aircraft avionics installations, while still carrying out their normal day-to-day maintenance and aircraft serviceability support functions. A phased approach recognises that limitation.”

## **MANDATORY CARRIAGE OF TRANSPONDERS**

The mantra of “Affordable Aviation” should not outweigh relevant safety considerations.

“Extended TCAS fitment requirement for passenger transport aircraft” does not mitigate the possibility of a mid-air collision between a TCAS equipped passenger transport and a non-transponder equipped aircraft.

In addition to the contents of the DP the RAAA believes that for ALL users of airspace the carriage of transponders should be made mandatory.

## **MANDATORY CARRIAGE OF VHF COMMUNICATIONS**

The mantra of “Affordable Aviation” should not outweigh safety considerations.

In addition to the contents of the DP the RAAA supports the concept that for ALL users of airspace the carriage and use of VHF communications should be made mandatory.

## **ASTRA**

The RAAA, and individual RAAA members, highlight shared concerns that the DP was not promulgated through the Australian Strategic Air Traffic Management Group (ASTRA) consultative process.

The RAAA is a very active participant within ASTRA, and encourages CASA to engage fully within this group.

Astra is an aviation industry body dedicated to developing an optimum air traffic management system for Australia. As such, it is the Federal Government’s primary source of industry advice on air traffic management directions.

ASTRA brings together all of the industry stakeholders including aircraft operators, airports and service providers to develop and continuously review the ASTRA Strategic Air Traffic Management Plan and develop a recommended Target Operational Concept.

ASTRA also provides an industry-wide representative forum for developing the industry position on ATM matters as the basis for strategic advice to Government, and to coordinate agreed integrated ATM planning, development and implementation effort by all relevant ATM stakeholders.

**1. PHASE 1 – Regulate for aircraft avionics fitment – for compliance by end-2013**

1.1

White Paper Reference	Proposed Technology Plan
Page 129: Short Term (five years to 2014)  <i>&gt;ADS-B OUT upper airspace mandate from 2013.</i>	ADS-B OUT required for aircraft flight at and above FL290 by December 2013. (Already mandated by CASA). Approx 400 Australian aircraft affected, as well as all foreign aircraft operating to Australia.
<b>Comments</b>	
The RAAA supports this proposal without changes	

1.2

White Paper Reference	Proposed Technology Plan
Page 129: Medium Term (2014-2019)  <i>&gt; Wider regulatory requirements for mandated communication, navigation and surveillance capability (e.g. up-take of Mode S and ADS-B OUT capable transponders and use by aircraft set by CASA).</i>	Forward fit requirements for new and replacement transponder installations and all new aircraft registrations to have Mode S transponder with ADSB OUT capability. This will affect all replacement transponder installations and all aircraft newly placed on the Australian Aircraft Register and the aircraft registers of recreational aircraft organisations, after end 2013.
<b>Comments</b>	
The RAAA supports this proposal without changes	

1.3

White Paper Reference	Proposed Technology Plan
<p>Page 126:</p> <p>&gt; <i>Wider carriage of airborne collision avoidance systems....</i></p>	<p>Fitment of TCAS II V7.1 to all <u>new</u> Regular Public Transport (RPT)/ Charter (CHTR) turbine powered aircraft &gt;5700 kg MTOW or &gt;19PAX. ICAO Standard applies for new turbine aircraft from 1 January 2014. (Also requires Mode S transponder capability in the aircraft).</p>
Comments	
<p>In the event that “<u>new</u>” means a new production aircraft built after 1 January 2014 the RAAA supports this proposal.</p> <p>In the event that “<u>new</u>” means all aircraft newly placed on the Australian Aircraft Register or an additional aircraft within an operator’ fleet the RAAA supports this proposal WITH changes. Specifically that with reference to the ICAO Standard the compliance by date of <b>1 January 2017</b> be used and proposed changes be incorporated. See Phase 3 changes.</p> <p>In support:</p> <p>The RAAA consider the fitment of TCAS II V7.1 to some aircraft within a specific operator’s existing fleet and not to others to directly contribute to an undesirable safety outcome. Specifically in high work load situations flight crew’s actions or inactions, influenced by equipment differences, has been demonstrated to be a causal factor in human error and subsequently, in extreme circumstances, an accident.</p> <p>Therefore within a specific operator’s fleet of the same aircraft type it is highly desirable that avionics equipment is standardized wherever possible to ensure flight crew and maintenance procedural differences, and subsequent safety risks, between individual aircraft are minimized.</p>	

2. PHASE 2 – Regulate for aircraft avionics fitment – for compliance by end-2015

2.1

White Paper Reference	Proposed Technology Plan
<p>Page 129: Medium Term (2014-2019)</p> <p><i>&gt; Wider regulatory requirements for mandated communication, navigation and surveillance capability (e.g. up-take of Mode S and ADS-B OUT capable transponders and use by aircraft set by CASA).</i></p>	<p>Mandatory fitment of TSO-C145a/146a or TSO-C196 or <u>equivalent</u> GNSS enroute and approach navigation capability for: All RPT/CHTR aircraft; forward fit requirement for all subsequent IFR aircraft GNSS replacement equipment installations on existing aircraft and all new IFR aircraft registrations after end 2015. All IFR aircraft to comply by end 2017.</p>
Comments	
<p>Subject to further clarification of “or equivalent” the RAAA supports this proposal WITH changes.</p> <p>In support:</p> <p>The RAAA encourages CASA to allow existing TSO’d GNSS enroute and approach navigation systems that do not meet TSO-C145a/146a or TSO-C196 standard (eg TSO-C129) that are shown to have equivalence to TSO-C145a/146a or TSO-C196 standard.</p> <p>The RAAA proposes operators should be allowed all avenues for approval of GNSS equipment if a safety based risk analysis provides an equivalent level of safety to TSO-C145a/146a or TSO-C196 standard.</p>	

2.2

White Paper Reference	Proposed Technology Plan
<p>Page 129: AUSTRALIAN INITIATIVES Medium Term (2014-2019)</p> <p><i>&gt; APV procedures available for 100% of instrument runways used by APV-capable aircraft</i></p>	<p>70% of all Australian instrument runways used by aircraft exceeding 5700 kg MTOW to be served by APV. Procedures will be based on Baro-VNAV capability.</p>
Comments	
<p>The RAAA supports this proposal without changes</p>	

2.3

White Paper Reference	Proposed Technology Plan
<p>Page 127::.... <i>A number of locations in Australia require enhanced air traffic management services. These include the enroute environment in WA.....</i></p>	<p>Mandatory fitment of ADS-B OUT equipage required in aircraft operating at and above FL110 within 500NM of Perth. This could affect about 400 Australian aircraft in addition to those already affected by the upper airspace ADS-B mandate for December 2013.</p>
Comments	
<p>The RAAA supports this proposal without changes</p>	

2.4

White Paper Reference	Proposed Technology Plan
<p>Page 127::.... <i>ICAO has identified runway incursions as a threat to aviation safety. The use of electronic surveillance on the surface by ATC and pilots will increase situational awareness.</i></p>	<p>Mode S transponder fitment required for all aircraft operations into Sydney, Melbourne, Brisbane and Perth Airports (A-SMGCS aerodromes).</p>
Comments	
<p>The RAAA supports this proposal without changes</p>	

### 3. PHASE 3 – Regulate for aircraft avionics fitment – for compliance by end-2017 (start of 2017 for TCAS II V7.1)

#### 3.1

White Paper Reference	Proposed Technology Plan
Page 129: AUSTRALIAN INITIATIVES Medium Term (2014-2019)  <i>&gt; APV procedures available for 100% of instrument runways used by APV-capable aircraft</i>	All RPT/CHTR aircraft >15,000 kg MTOW or 30PAX capacity to be APV capable by either Baro-VNAV or RNP-APP AR. ILS will remain satisfactory for those aircraft operating only to aerodromes equipped with ILS.
Comments	
<p>The RAAA supports this proposal WITH changes relating to revision of MTOW and PAX capacity provision to align with the current CAR (1988) definition of a high capacity aircraft, as follows:</p> <p style="padding-left: 40px;">Delete: RPT/CHTR aircraft &gt;15,000 kg MTOW or 30PAX capacity</p> <p style="padding-left: 40px;">Insert: high-capacity RPT/CHTR aircraft</p> <p>In support:</p> <p style="padding-left: 40px;">CAR (1988) defines high capacity, in relation to an aircraft, means permitted, by the aircraft’s certificate of type approval:</p> <p style="padding-left: 80px;">(a) to have a maximum seating capacity of more than 38 seats; or</p> <p style="padding-left: 80px;">(b) to carry a maximum payload of more than 4,200 kilograms;</p> <p>The RAAA believe that a distinction between low and high capacity aircraft is more appropriate. And further that this distinction more appropriately takes in to account the unique challenges facing regional aviation including out of production aircraft, capital outlay considerations, and likely outcomes of safety based risk analysis.</p> <p>The RAAA encourages CASA, with the use of a safety based risk analysis, to review the MTOW and PAX capacity provision.</p>	

#### 3.2

White Paper Reference	Proposed Technology Plan
<i>&gt; Potential adoption of SBAS to assist in making APV widely available.</i>	Every instrument runway in Australia to have an APV.
Comments	
The RAAA supports this proposal without changes	

3.3

White Paper Reference	Proposed Technology Plan
<p>Page 129: Medium Term (2014-2019)</p> <p>&gt; <i>Wider regulatory requirements for mandated communication, navigation and surveillance capability (e.g. uptake of Mode S and ADS-B OUT capable transponders and use by aircraft set by CASA</i></p>	<p>Mandatory carriage of ADS-B OUT required for all operations at/above FL110</p>
<p><b>Comments</b></p>	
<p>The RAAA supports this proposal without changes</p>	

3.4

White Paper Reference	Proposed Technology Plan
<p>Page 126: <i>Wider carriage of airborne collision avoidance systems</i></p>	<p>Fitment of TCAS II V7.1 to existing RPT/CHTR turbine powered aircraft &gt;5700 kg MTOW or &gt;19PAX by 1 January 2017 (ICAO Standard). Also requires Mode S transponder capability in the aircraft for TCAS capability.</p>
<p><b>Comments</b></p>	
<p>The RAAA supports this proposal WITH two changes relating to MTOW provisions and equivalent equipment as follows:</p> <ol style="list-style-type: none"> <li>1. Delete: &gt;5700 kg MTOW</li> <li>2. Delete: Fitment of TCAS II V7.1</li> </ol> <p style="padding-left: 40px;">Insert: Fitment of TCAS II V7.1 or equivalent</p> <p>In support:</p> <ol style="list-style-type: none"> <li>1. The RAAA encourages CASA to delineate the requirement to RPT/CHTR turbine powered aircraft permitted, by the aircraft's certificate of type approval to have a maximum seating capacity of more than 19 seats.</li> </ol> <p style="padding-left: 40px;">The RAAA believe that this distinction is more appropriate. And further that this distinction more appropriately takes in to account the unique challenges facing regional aviation including out of production aircraft, capital outlay considerations, and likely outcomes of safety based risk analysis.</p> <ol style="list-style-type: none"> <li>2. The RAAA encourages CASA to allow existing TCAS systems that do not meet TCAS II V7.1 standard that are shown to have equivalence to TCAS II V7.1 standard.</li> </ol> <p style="padding-left: 40px;">The RAAA proposes operators should be allowed all avenues for approval of equivalent TCAS equipment if a safety based risk analysis provides an equivalent level of safety to TCAS II V7.1 standard.</p>	

**4. PHASE 4 – Regulate for aircraft avionics fitment – for compliance in the 2020 - 2020+ timeframe (exact compliance dates yet to be defined)**

4.1

White Paper Reference	Proposed Technology Plan
<p>Page 129: AUSTRALIAN INITIATIVES Long Term (2020-2025)</p> <p><i>&gt; Electronic surveillance of traffic by either aircraft-to-aircraft or air navigation service providers will be assured for operations in controlled airspace generally and from the surface within specified volumes of airspace at aerodromes with traffic densities exceeding a risk-based threshold.</i></p>	<p>1 Jan 2020: Mandatory fitment of Mode S + ADS-B OUT transponder capability required for aircraft operating in Classes A, C, D and E airspace; in Class G airspace at/above FL110, and from the surface within 20NM of designated aerodromes (i.e. an aerodrome listed with safety criteria based on traffic density and having RPT services.)</p>
<p><b>Comments</b></p>	
<p>The RAAA supports this proposal without changes</p>	

4.2

White Paper Reference	Proposed Technology Plan
<p>Page 129: Medium Term (2014-2019)</p> <p><i>&gt; Potential adoption of satellite based augmentation systems (SBAS) to assist in making APV widely available</i></p>	<p>2020+: All IFR aircraft to be APV capable by Baro-VNAV, RNP APP AR, SBAS, or Modernised GNSS, as relevant.</p>
<p><b>Comments</b></p>	
<p>The RAAA supports this proposal without changes</p>	

4.3

White Paper Reference	Proposed Technology Plan
<p>Page 129: AUSTRALIAN INITIATIVES Long Term (2020-2025)</p> <p><i>&gt;Electronic surveillance of traffic by either aircraft-to-aircraft or ATC will be assured.....from the surface within specified volumes of airspace at aerodromes with traffic densities exceeding a risk-based threshold.</i></p>	<p>1 Jan 2020: Forward fit requirements for new registrations of Air Transport aircraft &gt;15,000 kg MTOW or 30PAX capacity to have ADS-B IN/CDTI.</p>
Comments	
<p>The RAAA supports this proposal WITH changes relating to revision of MTOW and PAX capacity provision to align with the current CAR (1988) definition of a high capacity aircraft, as follows:</p> <p style="padding-left: 40px;">Delete: Air Transport aircraft &gt;15,000 kg MTOW or 30PAX capacity</p> <p style="padding-left: 40px;">Insert: high-capacity Air Transport aircraft</p> <p>In support:</p> <p style="padding-left: 40px;">CAR (1988) defines high capacity, in relation to an aircraft, means permitted, by the aircraft’s certificate of type approval:</p> <p style="padding-left: 80px;">(a) to have a maximum seating capacity of more than 38 seats; or</p> <p style="padding-left: 80px;">(b) to carry a maximum payload of more than 4,200 kilograms;</p> <p>The RAAA believe that a distinction between low and high capacity aircraft is more appropriate. And further that this distinction more appropriately takes in to account the unique challenges facing regional aviation including out of production aircraft, capital outlay considerations, and likely outcomes of safety based risk analysis.</p> <p>The RAAA encourages CASA, with the use of a safety based risk analysis, to review the MTOW and PAX capacity provision.</p>	

4.4

White Paper Reference	Proposed Technology Plan
<p>Page 129: AUSTRALIAN INITIATIVES Long Term (2020-2025)</p> <p><i>&gt;Electronic surveillance of traffic by either aircraft-to-aircraft or ATC will be assured.....from the surface within specified volumes of airspace at aerodromes with traffic densities exceeding a risk-based threshold.</i></p>	<p>2020+: Forward fit requirements for new registrations of Air Transport aircraft &gt;5700 kg or 19PAX capacity to have ADS-B IN/CDTI capability.</p>
Comments	
<p>The RAAA supports this proposal WITH changes relating to revision of MTOW and PAX capacity provision to align with the current CAR (1988) definition of a high capacity aircraft, as follows:</p> <p style="padding-left: 40px;">Delete: Air Transport aircraft &gt;5700 kg or 19PAX capacity</p> <p style="padding-left: 40px;">Insert: high-capacity Air Transport aircraft</p> <p>In support:</p> <p style="padding-left: 40px;">CAR (1988) defines high capacity, in relation to an aircraft, means permitted, by the aircraft’s certificate of type approval:</p> <p style="padding-left: 80px;">(a) to have a maximum seating capacity of more than 38 seats; or</p> <p style="padding-left: 80px;">(b) to carry a maximum payload of more than 4,200 kilograms;</p> <p>The RAAA believes that a distinction between low and high capacity aircraft is more appropriate. And further that this distinction more appropriately takes in to account the unique challenges facing regional aviation including out of production aircraft, capital outlay considerations, and likely outcomes of safety based risk analysis.</p> <p>The RAAA encourages CASA, with the use of a safety based risk analysis, to review the MTOW and PAX capacity provision.</p>	



The RAAA would welcome any questions that the CASA Standards Development and Future Technology might have and can be available for meetings with any reasonable notice.

A handwritten signature in black ink, reading "Paul Tyrrell". The signature is written in a cursive style with a large initial 'P' and 'T'.

Paul Tyrrell  
Chief Executive Officer

