



10 July 2012

David Gilbert
Regulatory Impact Analyst
AARD
Civil Aviation Safety Authority
GPO Box 2005
Canberra ACT 2601

Dear Mr Gilbert,

Draft Regulation Impact Statement
Aircraft avionics equipage mandates for satellite-based IFR navigation,
Mode S/ADS-B transponders and forward fitment of TCAS II version 7.1

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 28 Ordinary Members (AOC holders) and 63 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, universities, 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, Airnorth and Chartair Northern Territory networks, West Wing Aviation in Mt Isa, Airlines of Tasmania in Hobart and Skytrans operations from Cairns, to name a few.

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

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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 Draft Regulation Impact Statement Aircraft avionics equipage mandates for satellite-based IFR navigation, Mode S/ADS-B transponders and forward fitment of TCAS II version 7.1

The RAAA has consistently supported these initiatives for their value in enhancing aviation safety in a cost effective way.

In relation to the RIS, the RAAA does not question the overall savings anticipated. However, it does note that some of the savings claimed as future savings, especially in relation to the benefit of ADS-B in allowing more flexible routing, have been taken already.

The expected greater efficiency in the management of approaches has been and continue will be lost if Traffic Flow systems do not operate effectively. There has been a recent example of this with all en route benefits being lost due to the breakdown of the Metron system in Perth.

Conclusion

The RAAA is appreciative of the ability to respond to this RIS.

Further to your telephone call with our Office Manager, due to our CEO, Paul Tyrrell, being overseas at this time, we may take up the opportunity to submit an amendment to this submission on his return, if it is felt necessary.

Regards

A handwritten signature in black ink, appearing to read "B. Candler", is positioned above the typed name.

Brian Candler
Project Officer

Annex A: RAAA Ordinary Members

