

DP Response Form

CASA'S PLAN FOR AIRCRAFT COMMUNICATION, NAVIGATION AND SURVEILLANCE EQUIPAGE IN THIS DECADE

Please complete your response by 31 October 2011 and return it by one of the following means:

Online (preferred method*) 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)
dp1102as@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 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): (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 Tyrrell Date: 7 November 2011

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 checked="" type="checkbox"/> Other (specify below*, e.g. parachutist) |
|---|---|---|---|---|--|

* Details: Industry Association representing regional aviation in Australia

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 section 4 of this DP)

CASA invites comment on those proposals indicated in this DP by ticking [✓] the appropriate box and/or commenting below.

Note: For those proposals on which CASA has indicated it intends to proceed directly to NPRM on the basis of strong industry support, no further responses are sought at this time.

Proposal 2: Proposal for aircraft carriage of a Mode S or Mode A/C transponder in Class D airspace from 1 January 2014. (Exemptions would initially apply)

- 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: _____

See Attached Document

Proposal 6: Proposal for mandatory TCAS II V7.1 equipage in existing turbine powered passenger transport aircraft >5700kg/19PAX operating at/above FL290 from 1 January 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: _____

See Attached Document

Proposal 9: Proposal for mandatory ADS-B OUT equipage in all aircraft operating in airspace classes A, C, D and E by 1 January 2020. (Exemptions to initially apply)

- 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: _____

See Attached Document



7 November 2011

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

Dear Mr Boyd,

**Discussion Paper 1102as
Revised Plan for Aircraft Communication,
Navigation and Surveillance Equipage in this Decade**

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 29 Ordinary Members (AOC holders) and 57 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, Chartair and Vincent Aviation 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

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.

RAAA Response to DP 1102as Revised Plan for Aircraft Communication, Navigation and Surveillance Equipage in this Decade.

INTRODUCTION

The RAAA welcomes the opportunity to comment on CASA's Discussion Paper – Revised Plan for Aircraft Communication, Navigation and Surveillance Equipage in this decade (Document DP 1102AS – September 2011).

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 most welcome.

DP 1102AS PROPOSALS THAT WILL PROGRESS DIRECTLY TO NPRM

The RAAA is broadly supportive of those proposals that will progress directly to NPRM contained with CASA's Discussion Paper – Revised Plan for Aircraft Communication, Navigation and Surveillance Equipage in this decade (Document DP 1102AS – September 2011). The RAAA looks forward to reviewing the published NPRMs and providing further feedback at that time.

OVERALL STRATEGY

The RAAA agrees with 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
- ➔ extended 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 agrees with the Phased Approach outlined in CASA's October 2010 Discussion Paper – 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), 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 agrees with 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

“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 strongly believes that for ALL users of airspace the carriage of transponders should be made mandatory.

MANDATORY CARRIAGE OF VHF COMMUNICATIONS

The concept of “Affordable Aviation” should at no time outweigh significant safety considerations.

In addition to the contents of the DP the RAAA strongly believes 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 an 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. RAAA Responses

1.1 RAAA Response to Proposal 2

Proposal
Proposal for aircraft carriage of a Mode S or Mode A/C transponder in Class D from January 2014. (Exemptions would initially apply)
Comments
The RAAA supports this proposal without changes.
The RAAA highlights the significant safety benefits arising from the mandatory carriage of a Mode S or Mode A/C transponder in Class D airspace and encourages CASA to limit where possible the applicability of initial exemptions and expedite the time frame applying to those initial exemptions.

1.2 RAAA Response to Proposal 6

Proposal
Proposal for mandatory TCAS II V7.1 equipage in existing turbine powered passenger transport aircraft >5700kg/19PAX operating at/above FL290 from 1 January 2017.
Comments
The RAAA supports this proposal without changes

1.3 RAAA Response to Proposal 9

Proposal
Proposal for mandatory ADS-B OUT equipage in all aircraft operating classes A, C, D and E by 1 January 2020. (Exemptions to apply initially)
Comments
<p>The RAAA supports this proposal without changes.</p> <p>The RAAA highlights the significant safety benefits arising from the mandatory carriage of ADS-B OUT equipage in all aircraft operating classes A, C, D and E by and encourages CASA to limit where possible the applicability of initial exemptions and expedite the time frame applying to those initial exemptions.</p>

Regards



Paul Tyrrell
Chief Executive Officer

Annex A: RAAA Ordinary Members

