MOONEY

23rd June, 2008

Department of Infrastructure, Transport, Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam,

Ref. Development of a National Aviation Policy

The Australian Mooney Pilots Assocation represents a small but unique group within Australian Aviation. Our membership believes that current aviation policy in this country restricts the social and economic benefits that we would experience if the aviation industry was active, vibrant and well supported by all levels of government.

Background.
There are approximately 150 Mooney aircraft on the Australian Civil Register. The Australian Mooney Pilots Assocation (AMPA) currently has 74 members, representing 65 aircraft.

The Mooney Airplane Company, based in Texas USA, specialises in fast, efficient, 4 seat, single engined aircraft. As such, these aircraft are ideally suited to longer distance private/business travel. They are not used for passenger charter (being single engine) and nor are they in the executive aviation segment.

As a result of the unique Mooney aircraft attributes, we believe that our Mooney association has a very strong percentage of business use when compared to general aviation averages.

Our membership includes people who use their planes for the following business purposes:

- Health professionals and administrators servicing remote and indigenous communities
- Health-related services to regional areas.
- Angel Flights.
- Engineering professionals servicing remote regions (e.g. mining, agriculture and local government).
- Education professionals.
- Business people servicing the primary and mining industries in regional and remote areas
- A primary producer travelling between properties in Qld and NT.

Following are some typical examples of where our members use their aircraft and the alternatives transport options:

- A mining engineer involved in the early stages of mine development in WA. His plane allows him to do several jobs on different sites in two or three days. Alternatively, he would require approx. 7 -10 days driving in poorly accessible areas. There are no RPT flights into the areas where he operates.
- An optometrist who services regional Qld. He can service a number of communities in one week which would require 10 or 11 days if he had to drive. Once again, there are no RPT options.
- A WA based medico who services remote indigenous communities in WA. He can service a number of communities in a couple of days where a week would be required if driving.
- A business that supplies equipment for agriculture and related industry. His business based in Sth NSW can service all areas of the wheat belt (including WA). Many projects can be accessed within several hours by private plane, where driving would take a day (or longer) and RPT flights (all connections via capital cities) combined with a significant amount of driving would, in many cases, take longer.

- A Qld based consultant physician who serves a number of communities with populations ranging from 500 to 5,000. It is common for him to fly for 2 hours, consult and then return home all in the one day. To drive would often involve up to 12 hours driving each way. Many of his patients include elderly, frail and indigenous people who would otherwise need to travel long distances.
- A medical specialist who uses his aircraft to assist medical retrieval teams who have flown into rural NSW to treat and stabilize sick children but need support in achieving adequate stabilisation for safe transfer to a children's hospital.

Whilst is difficult to determine across the entire membership, most members who use their plane for business have indicated that their aeroplane usage is between 70% and 90% related to business activities. Of the remaining, a significant proportion is related to ongoing training, leaving only small percentage for personal/recreational activity.

A number of our pilots have overseas flying experience, mostly in the United States. Whilst we know that we do not have the size of population or economy in Australia, and we recognise shortcomings in their system, we believe that there is a lot to learn from the US model. Aviation should be equally as important in Australia as we have a very limited regular public transport network and long distances to travel.

Following is a list of issues and recommendations from our membership.

Promotion of Aviation – Including General Aviation (GA)
The culture that permeates our Civil Aviation Safety Authority is one that does not include the concept of the promotion of aviation.

This culture was typified so well recently by the comments of a CASA representative. One of our members was waiting to have his new plane inspected for registration. The CASA representative was taking quite some time to undertake the inspection (weeks, not days) and when challenged about the urgency responded that it is the planes that are flying that have priority because "a plane that is effectively grounded does not represent a safety risk". If we had a culture of promoting aviation, CASA would recognise that the aircraft owner's $600K investment was important and that getting the plane flying would be a priority. Perhaps this also says something about the level of resources within CASA.

One of the frustrations for many private pilots is the constant changing of rules and regulations. This frustrates many pilots who find this all too hard and effectively surrender their involvement in GA. Whilst safety is very important (AMPA run its own pilot safety program), we need also to ensure that we are also promoting the industry when we are addressing safety through change.

There seems often to be a belief that GA is simply a recreational activity of the wealthy, and therefore it does not deserve government support. We believe that our membership and members flying activities demonstrate that aviation plays an important role in economic activity and provision of social services

An often mentioned benefit of promotion of aviation is the flow-on effect to the major airlines which are currently experiencing difficulty attracting pilots.

Our members who have flown in the US are quick to point out that one of the first differences you notice is that there is much focus on promoting and supporting aviation. This support comes form all levels of government and the community in general.

Access to Airports
We have two major access problems in Australia: the lack of airports and restricted access to military facilities.

It is ludicrous that we are closing down airports (e.g. Hoxton Park) and effectively banishing GA from others (e.g Bankstown) by pricing their use out of the reach of small business. A metropolitan area such as Sydney is dramatically under-serviced in terms of access to GA airports. We have members who have a significant drive just to get to Bankstown or Camden. If we were honest about promoting aviation, we would be providing more facilities. Once again the US example demonstrates that when

we compare similar-sized cities, a well promoted industry can support an increase in the number of facilities.

Access to existing military facilities needs to be considered. One member was recently undertaking business in Nowra and the port of Newcastle, NSW. His office was in regional NSW and so RPT was not an option. In both cases, the closest airports were military (Williamtown and Nowra). However, permission was not given to access those airports so the nearest suitable airport was about 75minutes drive away. In neither case would the military airport be considered "busy" – the only real impediment was the policy of excluding civil flights from military airports. It is difficult to find a valid excuse for this policy. There are a number of global precedents for the safe, effective use of military airports by general aviation.

As an added note, the defence forces in Australia have been granted exclusive use over a significant percentage of Australian Airspace. This would seem unnecessary when compared to other international models even before the relatively small scale of the ADFs aviation activities is taken into account. This creates a significant inconvenience to GA flights and often in areas that are much travelled (e.g. Amberley, Richmond, Nowra etc)

Another problem that GA pilots face is the lack of a common security access systems at airports. For example Essendon and Moorabbin airports in Melbourne have different security access systems. For pilots who may not use a particular airport often this is an added difficulty.

Lack of Infrastructure

The level and quality of infrastructure is notably lacking in Australia. In the user-pays environment, the provision of infrastructure is always going to be well behind the potential. If quality facilities don't exist, people will be discouraged from using what is there and so the demand will not be generated. It would seem that all levels of government (federal, state and local) lack vision in terms of the benefits of a vibrant general aviation industry.

Examples of potential infrastructure improvement include;

- Provision of quality runway surfaces. For example many council runways are grass/gravel/clay which limits use to dry weather and often prevents higher performance aircraft (including our Mooneys) from using them.
- Provision of computers/internet accessible by pilots for flight planning and weather forecasts.
- Access to phone, good toilet facilities.
- Access to fuel – in remote areas this makes flight planning difficult and prolongs flights.
- Access to airport courtesy vehicles (Many US airports have complimentary courtesy vehicles for travel local to the airport)

There needs to be a commitment to the improvement and maintenance of the infrastructure. This, we believe, needs to come from a federal level. Clearly major infrastructure (such as air traffic control, radio networks etc) needs to be managed federally. Other components, such as local airfields, need more support. Local councils often do not derive a direct monetary benefit that allows them to plough back money into maintenance and development.

VHF Coverage

A number of our members conduct a significant amount of their flying in remote areas. The lack of VHF radio coverage is a major concern. The lack of coverage compromises safety and limits operations (e.g. it often precludes IFR operations). Surely it is time to fill the gaps in Australia's VHF network so that the whole country has VHF above 5000 feet and much more area with coverage to circuit heights.

The option of HF radio is not always practical for the following reasons:

- HF radios for aviation must be TSOd. The available TSOd radios are quite primitive when compared to current radio communications technology (e.g. weight of equipment, digital tuning etc)
- A number of aircraft with HF have limited channel selection availability which means that operations over larger areas of Australia would mean regular changing of crystals – a costly process.

- TSOd HF equipment is expensive
- HF radios add significant weight – a real problem for light aircraft regularly engaged in long journeys
- The HF antenna is an icing issue for a number of Mooney's which have TKS systems and therefore cannot be fitted.
- The long HF aerial is a problem to fit to the Mooney all flying tail and induces an asymmetric drag (as it does in any light aircraft)

SBAS
Given the importance of aviation in Australia and the current levels of technology available, we believe that a commitment needs to be made to a satellite based GNSS augmentation system. While a ground based system could conceivably meet the needs of the major airlines at major airports, this leaves much of the country without access to vertical navigation for precision approaches.

A particular case in point is the VH-TFU (Lockhart River) incident where the availability vertical navigation may have prevented loss of life.

ADSB
A commitment to providing ADSB as soon as possible will bring many benefits to aviation. Primarily our members look forward to the safety benefits that are currently only available to those flying the highly populated east coast or the areas surrounding the capital cities elsewhere.

Availability of Real Time Weather
Given the level of technology currently available, we believe that the weather information available to pilots in the air is not acceptable. The have been accidents that could have been avoided if the pilot had real-time weather (e.g. VH-PYN – which suffered an in flight break up of the airframe due to severe weather conditions). However a number of pilots have expressed concern that we do not have access to the level of information that is available. Our concerns are:

- The Flightwatch network is not available on many occasions due to staff shortages.
- Our members report being unable to contact Flightwatch when they should have been available
- The Flightwatch network is not extensive in remote areas.
- The coverage of the weather radar network does not assist in providing real-time information for much of the country (including major centres such as Dubbo, NSW)

An ideal model would be the XM satellite system available in the US where near real-time storm information, and current forecasts are available to pilots without the need for direct contact with a with an ATC/Flightwatch operator.

Access to Approach Training/Currency
A number of members have commented on the difficulty experienced accessing ILS approaches. We have a limited number of airports with ILS ground equipment but the currency (35 days) for ILS means that often our pilots need to take every opportunity to carry out an ILS approach. A number of airports with ILS are not accessible to GA or require this to be pre-arranged (which adds to the complexity of flight planning). Members report that, on occasions, ATS will not make the ILS available even when pre-arranged.

Importance of Recreational flying.
Community thinking and Government policy often seem to reflect the attitude that GA (and in particularly recreational flying) is an unnecessary luxury or a downright nuisance. This is seen with the negative publicity that most airports attract and the oppressive regulatory regime applied to the industry.

We would argue strongly, that the real benefits of GA can only be achieved when there is a strong community support of recreational flying. Very few (if any) pilots learn to fly because they have a need but no desire. Recreational flying fosters the interest and gives people the opportunity to develop skills. Whilst people with a desire to fly recreationally should have as much right to do so as a citizen driving their car along a public road to attend an entertainment function, we need also to remember that it is

from this base that pilots then move to providing the benefits to the community that arise from the whole aviation industry (GA and Commercial).

Of key importance is the development of pilot training. It has been suggested that pilot training could be brought into the HECS scheme. This would provide another financing option for young people wanting to make aviation a career.

Community Benefit
Our association recognises that it cannot provide information about the benefit to be derived from the GA industry in Australia. As can be noted in our introductory comments, a number of our members feel that we are making strong contributions to the wider community. Without the use of our planes we could not do so with the same level of efficiency. In particular we highlight again that there is a significant level of activities in rural and remote areas.

From a community perspective, we see that GA is providing benefits in the following areas;

- Reduced activity on roads (which in many cases are poorly maintained in remote areas)
- Allowing greater use of skills (thereby reducing cost to the community or providing services which may otherwise be left wanting due to skills shortages) e.g. provision of engineering and health services
- Providing these services in a timely fashion (i.e. response times can be much faster due to air travel)
- Contrary to some community opinion, in the case of our "efficient" Mooney's the net effect on greenhouse emissions is very little different from alterative forms of transport (e.g. in many cases our aircraft would use the same fuel for a journey as would a Toyota Landcruiser)

For Further Information.
The Australian Mooney Pilots Association is keen to assist further with the development of a new aviation policy. For further information and/or clarification please contact the following;

AMPA Website – www.mooney.org.au

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Yours Faithfully

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