

Director, Airspace and Future Technology

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RE: National Strategic Airspace – National Aviation Issues Paper, May 2021

Dear Sir/Madam,

I am writing to provide feedback on your proposals for airspace classification as described in the above issues paper.

I am a fifty seven year old VFR private pilot and have enjoyed the privileges of flying in a private capacity since I first obtained my license at eighteen.

I believe my feedback might provide a perspective to assist you in reaching a direction that achieves both the current and future safety outcomes desired whilst maintaining equitable access and enjoyment of this airspace amenity with ALoSP.

My feedback primarily discusses the proposals AC7 – AC10.

The main aspects of these proposed changes is the conversion of the current Class G into Class E down to significantly lower altitudes. Much of the rationale for these changes can be summarized as:

- a) Increased services available to IFR pilots and;
- b) The Class E requirement for aircraft to be equipped with an ADS-B transmitter, currently not required in Class G

Both justified by the mantra making the airspace safer – but does it?

Addressing these in turn:

- a) In Class G, both IFR pilots and VFR pilots can have flight information and flight following services available to them on request, whereas for Class E, ATC are required to provide this for IFR flights only, and VFR pilots must request this service. So it would seem there is little benefit to either IFR or VFR pilots by changing E to G from this aspect
- b) I appreciate the future challenges associated with drones and VTOL craft beginning to demand more access to the traditional divisions of airspace and the safety matters associated with this. There is no doubt that having an ADS-B transmitter fitted to all aircraft types, including drones in the future, would make the skies safer through making the ATC job of separation easier.

However, using the conversion of Class G to Class E to achieve the outcome of ADS-B fitment is like using a sledge hammer to crack a peanut. This is because there are other consequences and conditions associated with Class E that have not been contemplated nor justified in the rationale – these are the meteorological separation requirement differences between the two classifications.

VMC – non-controlled airspace – Class G

Height	Flight Vis	Distance from cloud	Additional conditions
Aeroplanes, helicopters and balloons			
1. At or above 10,000 ft AMSL	8 km	1000 ft vertical 1500 m horizontal	
2. Below 10,000 ft AMSL (subject to items 3 and 4 on page 3.12)	5000 m	1000 ft vertical 1500 m horizontal	

With reference to the CASA VFRG right, a VFR pilot in Class G airspace may fly “clear of cloud” below 3000ft AMSL or if >3000ft AMSL, clear of cloud 1000ft above terrain.



VMC – controlled airspace – Class E

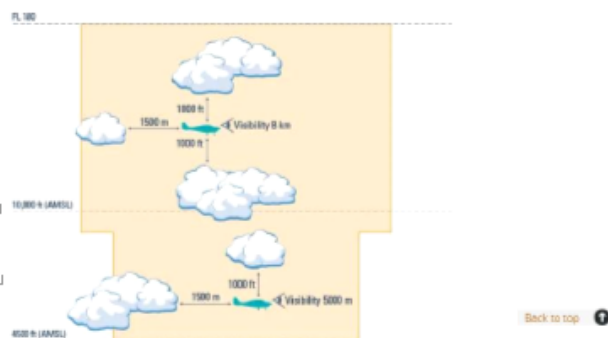
Type of aircraft	Height	Flight Vis	Distance from cloud	Additional conditions
Aeroplanes, helicopters and balloons	At or above 10,000 ft AMSL	8 km	1500 m horizontal 1000 ft vertical	
	Below 10,000 ft AMSL	5000 m	1500 m horizontal 1000 ft vertical	

Source: AIP ENR 4.2

However, in Class E airspace, a VFR pilot must maintain 1000ft vertical separation from cloud as shown right.

This imposed restriction introduces safety issues for VFR pilots at lower altitudes

If Class E replaces Class G down to altitudes of 3000ft AMSL or lower, VFR pilots will be forced to **fly lower** in meteorological conditions where they might otherwise have been able to fly more safely at greater heights “clear of cloud” OR it means they cannot fly at all. The skies would no doubt be safer if no one was flying, but this is hardly a great achievement for CASA.



Recommendation:

For VFR pilots, weather and clouds are a major safety concern, and altitude at lower levels is vital for reasons that should be self-evident, even to non-pilots. These matters are not a main concern

for IFR pilots including commercial operators. Lowering Class E into Class G makes no safety difference to IFR pilots, but it makes a big difference to VFR pilots – ie. Makes it less safe.

If CASA cannot find better solutions than simply drastically lowering Class E, it should at least find a mechanism to achieve the fitment of ADS-B transmitters WITHOUT impacting the meteorological separation requirements for VFR pilots, so that VFR pilots can fly safely at these altitudes as they do now with Class G cloud separation requirements.

I hope you will take this feedback into consideration.