

RESPONSE TO THE NATIONAL AVIATION POLICY ISSUES PAPER

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Background of writer

Now retired, I have been involved in the aviation industry for over 55 years and have accumulated over 22,000 hours flying experience in both General Aviation and Airline (RPT) operations. I have held an Instructor Rating and Check and IFR Training approvals on multi-engine aircraft. I have held the position of Safety/Risk Manager for two high capacity airlines and have been engaged as an auditor for IATA conducting IOSA Audits. I have owned and operated a light aircraft for the past 46 years. I have been involved in "airspace politics" since about 1981 participating in Regional Airspace and Procedures Advisory Committee's (RAPAC's) and the National body (NAPAC). As the Convenor of NAPAC I participated in the ACC and other meetings held by the then Service Provider and Defence Department, prior to the airspace responsibility transferring to the CASA OAR in 2007.

Comments

The policy issues paper is very comprehensive and outlines the various options in a sound manner. However I would expect the end policy paper to be more concise and perhaps not greater than five or six pages. One interpretation of this paper is that it outlines a direction for the ATS Service Provider however it needs to be understood that what is in this paper is for discussion only at this time and not a road map for Airservices future direction.

Consultation

Since the RAPACs were established in the late 1970's they have been the prime forum for the discussion of airspace and procedure matters. Without a doubt they have been the most successful and longest running of any forum in the aviation sector. As the present facilitator of the RAPACs, CASA are presently changing the structure of the forum in an attempt to update how they work, increase participation, and how information is distributed. This process has been slowed down due to the COVID virus and the limitations on travel during the past year. It is still works in progress.

Over the past year or two, consultation has taken a back seat due partly to the COVID virus and a desire from some entities to do their own thing and not participate in a RAPAC style forum. Unfortunately at least one organisation is guilty of this withdrawal and seems to want to undertake their own consultation which in recent times has failed due to an apparent inability to engage in open two-way discussions. Consultation must be two-way and not the delivery of change as a fait accompli. The only other forum existing at this time for discussion of airspace matters is ASTRA (Australian Strategic Air Traffic Management Group). This forum has not worked as designed for some years and their web page presently lists meetings for 2019 and nothing since.

One recent suggestion is that the prime consultation forum, such as RAPAC or its replacement and ASTRA be facilitated by the Department of Infrastructure, Transport, Regional Development, and Communications. Those that support such an idea believe that it would ensure that discussions are open, two-way and independent of the service provider and the regulator and fair to the industry.

Without appropriate consultation, any change proposal is at risk.

Comments

- Class F airspace. Airservices present proposal for modified airspace at Ballina is in fact Class F by default. If compliance with ICAO recommendations is of importance then Class F needs to be tabled as a formal alternative. It is understood that a Class D tower is not being considered due to cost.
- Base of Class A. As mentioned in the document the base of controlled airspace under ICAO recommendations is to be a VFR level. In Australia we use FL180 not FL185 for no

published reason. A change should be considered to FL185 and it be standardised across the country.

- Transponder requirement in Class E. Unlike the USA, Australia requires fitment of a transponder in Class E airspace. This requirement places a significant financial penalty on VFR General Aviation operations. Unlike the USA, Australia does not have such high traffic levels and this requirement is believed to have been introduced as a political *keep certain operators happy* move rather than one subject to a high level safety case and risk assessment. It should be reviewed, especially if there is significant Class E introduced below A085.
- Control Tower services. Present regulations give Airservices Australia the sole right to provide control tower services. There are a number of locations around Australia where the establishment of a Class D control tower is likely to be more economical if outsourced to a licenced provider. Such towers could be provided if required by or in arrangement with the aerodrome operator. Amendments to the applicable Act and/or regulations should be considered.
- Chart clutter. Much of the airspace outlined in the policy document would require some form of annotation and/or description on aeronautical charts. There are already some areas where the clutter is considered to be unacceptable and is as a result a potential safety hazard. It is understood that some information on charts is there as a legal requirement and not of a practical requirement. If this is so, then such information should be reviewed and placed elsewhere on the charts. Chart clutter needs to be considered as a check item in any proposal for new or amended airspace. One change that should be considered is to identify all PRD areas that are fully enclosed in controlled airspace (Class A, B, C) and delete them from the charts. It would then be up to ATC to regulate access. PRD areas are subject to regular audits and unless used on a regular basis they should be deleted.
- Transition Level. Presently the Transition Level is A100 due to a requirement to carry and use oxygen above A100. A change should be considered to 12,000ft and Oxygen requirements reviewed in line with those in the USA. This would provide an additional two VFR cruising levels.
- Military Control Zones. These zones need to be identified as Class A, B, C or D and the procedures applicable to the class put in place. Alternatively a different class of airspace needs to be considered such as that used in the UK for military control zones.

The key factor in the design and promulgation of airspace is STANDARDISATION across the board so that everyone knows the set up and what the requirements are. Keep it simple.

It is acknowledged that the ICAO recommendations need to be considered in regard to airspace design, however many of the ICAO documents are dated with some well over two decades old. My experience with ICAO is that it takes about seven years to process a change, so waiting for a suggestion to be published is perhaps untenable. What Australia should do, is take the lead and if an alternative to an ICAO recommendation is identified then steps should be taken to (a) design and implement such a change, declare a difference to ICAO, and (b) submit such a suggested change to ICAO for consideration.

I would strongly suggest that the final policy document include a statement of requirements for consultation on airspace and procedures and that standardisation of airspace design and promulgations and relevant procedures be of a high priority.

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