

Submission: 066

**Benet Hare**



Gap Drone Pty Ltd

## **Submission to CASA**

### Support for Expansion of ADS-B Mandate to Include UAV Operations Above 400 ft AGL

Submitted by:

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## **Executive Summary**

Gap Drone Pty Ltd supports the expansion of the ADS-B (Automatic Dependent Surveillance–Broadcast) mandate to also include unmanned aerial vehicles (UAVs) operating above 400 feet AGL. As an Australian developer of medium-weight, long-range UAV platforms, Gap Drone believes ADS-B integration is essential for safe and efficient airspace operations, particularly as UAV missions increasingly resemble those of light aircraft.

## **Background**

Gap Drone is currently developing a 149 kg fixed-wing UAV designed for extended-range logistics and infrastructure support. These missions routinely require flight profiles above 400 ft AGL and beyond visual line of sight (BVLOS), often covering distances of up to 1,000 km one-way.



The operational characteristics of this UAV, altitude, endurance, and routing align more closely with crewed light aircraft than traditional drone operations. As such, integration into shared airspace demands cooperative surveillance and enhanced situational awareness.

## Support for ADS-B Expansion

Gap Drone supports the inclusion of UAVs in the ADS-B mandate for the following reasons:

### -Airspace Safety

*ADS-B In and Out enables real-time awareness and deconfliction between UAVs and crewed aircraft, particularly in Class G and E airspace where radar coverage may be limited.*

### - Operational Efficiency

*Access to higher altitudes improves fuel efficiency, endurance, and routing flexibility. ADS-B compliance supports regulatory confidence and unlocks more viable mission profiles.*

### - Alignment with Aviation Standards

*Gap Drone's platform architecture and operational modelling are aligned with light aircraft performance and safety expectations. ADS-B integration reinforces this alignment and supports harmonisation with CASA and international frameworks.*

### - Sovereign Capability

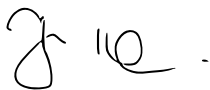
*As an Australian-built UAV platform, Gap Drone is committed to supporting national airspace safety and interoperability. Expanding the ADS-B mandate to include UAVs above 400 ft AGL strengthens Australia's leadership in advanced aviation systems.*

## **Recommendation**

Gap Drone recommends that CASA:

1. Expand the ADS-B mandate to include UAVs operating above 400 ft AGL under BVLOS conditions.
2. Provide a phased implementation pathway with technical guidance and transitional support for industry adoption.
3. Consider exemptions or alternate compliance pathways for low-risk operations in remote or sparsely populated areas.

Gap Drone is available to participate in trial programs, share operational data, and assist in the development of standards that ensure UAVs contribute positively to Australia's aviation ecosystem.

A handwritten signature in black ink, appearing to read "Benet Hare".

Benet Hare  
Co-Founder  
Gap Drone Pty Ltd.