Submission: 099

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Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts

Automatic Dependent Surveillance Broadcast (ADS-B) Submission

I fully support an ADS-B mandate in Australia. I am of the opinion that absolutely all aircraft in all airspaces should broadcast their Identification, Position, Altitude, and Velocity Vector. Simply put, if it leaves the ground it must broadcast its presence. To do anything less simply defers the problem to another day, and continues to send the signal to the less compliant airspace users that their unannounced presence is not important.

I support the proposed VFR Model if that is the best that you think that you can achieve but I believe that the model would be of much greater value if the proposed changes for the end of 2033 were brought forward to 2028. I can see no possible advantage in putting off a safety decision that obviously has to be taken eventually. The howls of the few that believe that aviation should be free of both cost and responsibility will not be remembered when an RPT aircraft in a busy airspace such as Bundaberg is involved in a mid-air collision. In my experience there is a vast difference in understanding between those pilots who have adopted ADS-B and those who refuse to do so. CASA has done a brilliant job of defining exactly who can see who and on what equipment. Unfortunately this is very much "Preaching to the Converted". Those that understand the utility of ADS-B Out already have it installed in their aircraft whereas those that do not think that it should be applied to their own use of airspace demonstrate limited or no knowledge. You cannot reach these pilots and the fact that CASA has extended the rebate for ADS-B installations shows that uptake is sub optimal. This is unlikely to change unless leadership is demonstrated by our rule makers.

In the event that the regulator decides that the VFR Mandate cannot be achieved sooner that proposed it would be my suggestion that the RPT or Certified Aerodrome Models be brought forward with all haste. The fact that hundreds of non-certified aircraft operated by amateur pilots can be allowed to operate, invisibly, in the vicinity of the paying travelling public defies belief.

If the regulator decided to mandate ADS-B Out it would have no impact on my operation other than to enhance my own and my passengers' safety as I operate an IFR aircraft. I am currently in the process of investing a further fifteen thousand dollars to install ADS-B In. I have been using an EFB app with an EC device (50% funded by CASA) to receive this information for the last couple of years and have become very aware of its limitations. It would seem that the benefits of a more robust solution would speak for themselves.

Regarding the timeline for ADS-B In adoption for IFR aircraft I hold the same opinion. I believe that the time for compliance should be brought forward. That being said, however, it is also obvious that owners of IFR aircraft tend to understand the benefits more clearly and also tend to maintain and equip their aircraft to a higher standard. If VFR aircraft were required to have and use ADS-B Out I believe that operators of IFR aircraft would feel that the benefit of being able to see all traffic, especially those pilots operating VFR aircraft illegally in IMC or marginal IMC, would be of great value and worthy of the investment required.

Regarding the height limitations for Drones, I must respectfully disagree. I stand by my original statement that everything that leaves the surface of the earth should broadcast its presence. Overseas experience shows that drones may be operated irresponsibly in areas and at altitudes that conflict with crewed aircraft, and collisions have occurred. This is another disastrous consequence of non-reporting aircraft, where the perpetrator of the incident simply runs away while the aircrew may be placed in life threatening danger.

In closing I commend this initiative and believe that it cannot come too soon. ADS-B Out for all aircraft is obviously the future of aviation. Given the potential costs of delay I believe that Australia should take a leading role in the widespread implementation of this life saving technology.

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