



Air Services Australia,  
GPO Box 367,  
Canberra ACT 2601.

**Re: Proposal to lower Class E airspace on the East Coast of Australia.**

The Sports Aviation Federation of Australia (SAFA) administers the activities and represents the interests of 3556 pilot members of hang gliders, paragliders, their powered versions and weight-shift microlights. Our members are located in every State and Territory of Australia.

The SAFA opposes the proposed change to Class E airspace proposed by Air Services Australia because:

- It will decrease the safety of our members while introducing significant compliance costs.
- It introduces operational requirements that will be virtually impossible to meet.
- It introduces a significant risk of fomenting a culture of non-compliance due to the two reasons stated above.
- The amount of time given to contribute meaningfully to a genuine discussion on airspace improvements is negligible. We therefore believe that this proposal cannot be entertained and clearly indicates that AirServices Australia is not interested in a mature and serious consultation.

In response to the proposals claimed benefits:

**Greater alignment to the International Civil Aviation Organisation (ICAO) system and proven United States practice of airspace management**

Class E airspace in the USA does not have the same requirements as Class E airspace in Australia. An example is that VFR aircraft in the USA do not require a transponder nor a VHF radio under 10000 feet AMSL. Class E airspace in the USA is transparent to VFR aircraft under 10000 feet AMSL; This is not so in Australia.

We believe that CASA's CNS/ATM policy which outlines a transition to new technologies is a superior policy compared to this proposal.

### **Improved safety for Regular Public Transport (RPT) operations and other airspace users**

It is our considered opinion that separating RPT and other high-speed operations to “above 10,000 feet AMSL” leaving the rest to operate “below 10,000 feet AMSL” is a far better system, and that the separation provides the safety benefits for RPT operations.

In this case we believe the proposal introduces risk by compressing the available airspace for aircraft to operate in that do not meet the operational requirements and will lead to greater non-compliant airspace incursions.

### **Reduced complexity for pilots and air traffic controllers**

We do not believe that the increase in numbers of our aircraft appearing on the screens and in the headsets of other pilots and ATC personnel will reduce complexity. Due to cluttering, which has been demonstrated on numerous occasions in the past, it will dramatically degrade situational awareness for all those involved.

### **Enhanced separation services based on surveillance**

A great many Sport aviation aircraft do not have an electrical system and under the proposed change these aircraft will be in the same class of airspace as RPT traffic. Only VHF radio could provide separation through alerted see and avoid. As such, the lowered Class E airspace would provide no additional benefit in separation. Currently, Sport aviation aircraft rarely use Class E airspace as they have the freedom to operate in Glass G up to 10,000' amsl in the airspace in question. Lowering Class E will lead to the VHF area frequencies becoming extremely congested with position reports from non-transponder equipped aircraft.

While the use of ADS-B may provide enhanced surveillance, this claim may not be valid for operations in mountainous areas where our members frequently operate.

### **Class E airspace does not restrict access for VFR aircraft**

This may be so, however, the increased requirements to comply as proposed when in Class E (mandatory VHF and possibly transponder), will be prohibitive in terms of cost and pilot safety, so as to exclude our members.

Our aircraft are open cockpit with associated wind noise. Pilots of our aircraft are unable to easily operate handheld VHF radios - their hands are fully occupied with the aircraft controls and gloves are usually worn. Changing frequency under these circumstances is virtually impossible and distracts from the prime need to **safely pilot the aircraft**.

Added to this, as we utilise UHF radios extensively for inter-aircraft communications, we would need to carry two radios. As many pilots also fly with PTT and speaker units in their helmets and there is no satisfactory communication system available that allows for switching between these two types of radio unit, the complexity of equipment carriage becomes increasingly onerous.

### **Controlled airspace containment and separation for IFR flights**

Many sport aviation operations include non-powered flight, where the ability to maintain a set altitude is not possible. We believe that ATC will not be able to maintain separation between IFR aircraft and non-powered aircraft in Class E using assigned flight levels.

The proposal that the Class E LL be tied to 1500' AGL is unworkable. Our aircraft do not have the ability to tightly control our flight envelopes to this restriction as we climb in

thermals and transit across undulating terrain. We are unpowered and do not deploy Terrain Following Radar (TFR). In addition, only high-performance instruments are able to give an indication of elevation above ground level, and cost well in excess of \$1000. This is a cost impost that is unacceptable and many pilots will not be in a position to afford.

We think this proposal does not fit in with the CASA CNS/ATM policy, nor does it align with full ICAO airspace specifications, and will NOT cater to the needs of private and sport aviation airspace users.

CNS/ATM policy posits that reduced separation standards are possible with the use of Nextgen and SESAR technologies, which in turn will allow more efficient use of airspace, but this proposal seeks to maintain current separation standards.

CNS/ATM provides better tools for alerted see and avoid and situational awareness; this proposal provides no improvement in this regard.

#### **Fosters equitable access for airspace users**

This claim is preposterous as it deliberately imposes operational requirements and practises upon our members that will exclude them from airspace that is currently open to them. Impositions such as these will significantly increase the risk of fomenting a culture of deliberate non-compliance. The policing of these impositions being almost impossible for SAFA and the incurred costs being unacceptable to the organisation. This is a situation that SAFA definitely does not want as it could have very serious negative consequences for the safety of **all** airspace users.

#### **Caters for current and future needs of airspace users**

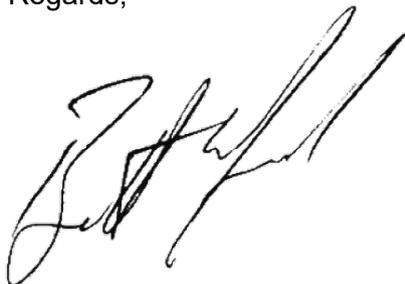
We have not been consulted as to SAFA's members' current and future needs. This statement is therefore completely mendacious and misleading.

#### **In conclusion.**

On the current information SAFA believes a better safety outcome is to leave the airspace Class G as is, and would support the initiative of VFR ADS-B (as part of CNS/ATM) or similar (currently being developed) new technology. Noting that any such initiative would need to be affordable and financially acceptable to our members.

The SAFA appreciates Airservices consulting on their proposals but feel that this particular proposal should have been subject to more internal and external review as it is not a workable model for equitable airspace use by all stakeholders.

Regards,



Brett Coupland - 13/2/2021  
COO Sports Aviation Federation of Australia.