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Title	Introduction of a regulatory framework for the operation of drones - Unmanned aircraft system operations in the open & specific category
NPA Number	NPA 2017-05 (A)

DAA Honourable Company of Air Pilots (daa@airpilots.org) has placed **5** unique comments on this NPA:

Cmt	Segment description	Page	Comment	Attachments
2958	(General Comments)	0	<p>We welcome the EASA decision to introduce standardised regulatory control of smaller un-manned air vehicles. We believe the general principles of this draft regulation are good. However, there are several issues of detail that must be resolved, including:</p> <ul style="list-style-type: none"> • Simplifying the category systems and defining how geo-fencing will operate to avoid endangering people who are in the proximity of a vehicle that encounters a geo-fence barrier. • Reviewing the level of detailed information that is required of manufacturers - details drawings etc. - so that it does not inadvertently provide the operator with sufficient knowledge to disable any embedded geo-fence system. • Explaining how an operator will be able to comply with a 'max 150m above ground level' requirement - which suggests every vehicle up to 25kg will require a radar altimeter or geo-database of height in addition to geo-fencing data. • A precise definition of 'toy' which is used to exempt certain types of flying vehicle from the requirements. <p>We would be happy to engage in discussion to further clarify the above and further comments below.</p>	
2960	2. In summary — why and what	4 - 6	<p>Page 4</p> <p>We believe the general principles adopted by this draft regulation are good. There are issues of detail still to resolve, such as simplifying the category systems and defining how geo-fencing will operate to avoid endangering people who are in the proximity of a vehicle that encounters a geo-fence barrier.</p> <p>We also believe the level of detailed information that is required of manufacturers - details drawings etc. - might inadvertently provide the operator with sufficient knowledge to disable any embedded geo-fence system.</p> <p>Page 5</p> <p>We note and welcome the intention to use a mix of operator proficiency and vehicle design requirements. However, there is insufficient guidance or mandate on how the design aspects will work. As an example, geo-fencing will prevent a vehicle from penetrating protected areas but vehicle behaviour on encountering</p>	

			<p>the fence could be to land or de-power and crash, both of which place overflown people and property at risk, or to return to its start point or some specified point associated with the protected area. Without guidance on this, manufacturers may implement modes that EASA did not envisage.</p> <p>Page 6 We note the Warsaw Conference required EASA to produce SIMPLE regulations. This is not borne out by the complex allocations of category of operation and vehicle within the body of this document, that increases the probability of citizens failing to understand and comply with the details therein.</p>	
2963	2.3.1.5 Model aircraft — 2.3.1.6 Boundaries of the open, specific, and certified category — 2.3.1.7 Third-country UAS operators — 2.3.1.8 Registration — 2.3.1.9 Link with the U-Space — 2.3.1.10 Applicability — 2.3.2 Open-category issues — 2.3.3 Specific-category issues — 2.4. What are the expected benefits and drawbacks	9 - 20	<p>Page 11 The list of certified-category operations appears adequate for now but the Warsaw Conference required the regulations to be future-proof so the list should include ‘future applications’ of vehicles above 25kg</p> <p>Unless it is the Agency's intention to separate completely the approach to vehicles covered by this NPA from those of certified-category operations, it would be helpful to provide outline proposals for the latter at the same time as concluding this task. Otherwise, there is a risk of an illogical disconnect in safety and operational requirements for essentially similar vehicle types.</p>	
2966	2.3.1.5 Model aircraft — 2.3.1.6 Boundaries of the open, specific, and certified category — 2.3.1.7 Third-country UAS operators — 2.3.1.8 Registration — 2.3.1.9 Link with the U-Space — 2.3.1.10 Applicability — 2.3.2 Open-	9 - 20	<p>Table 2</p> <p>We note the Warsaw Conference required EASA to produce SIMPLE regulations. This is not borne out by the complex allocations of category of operation and vehicle within the body of this document, that increases the probability of citizens failing to understand and comply with the details therein.</p>	

	category issues — 2.3.3 Specific-category issues — 2.4. What are the expected benefits and drawbacks			
2965	3.1.1 Draft cover regulation — Article 2	24 - 26	<p>Page 25</p> <p>'toy' should be defined - the phrase (except toys) is used within the draft regulations but without precise definition it may be used to circumvent the requirements.</p>	