



# SUMMARY OF CONSULTATION



## Frequency use in Class G



<b>Date</b>	October 2018
<b>Project number</b>	AS 16/03
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## Overview

CASA appreciates that matters associated with frequency use in Class G airspace are important to the aviation community. Therefore, a comprehensive consultation process has been undertaken to understand and quantify the preferences of industry. This is in addition to investigating safety issues related to radio frequency use in uncontrolled aerodromes, including aerodromes not published on charts.

Through this process, CASA obtained a large volume of feedback on the issues and concerns relating to radio frequency use in non-controlled airspace. Previous consultation has included a discussion paper resulting in an initial proposal by CASA to introduce MULTICOM (126.7 MHz) in low level airspace with expanded CTAFs. This proposal was not supported.

A second proposal, to which this summary of consultation relates, was developed based on previous feedback, industry discussions and a risk assessment. This included a low-risk proposal that would maintain the principles of 'alerted see and avoid' whilst being sufficiently uncomplicated so pilots can adopt consistent radio procedures when operating in low level Class G airspace.

## About this consultation

This consultation proposed the use of 126.7 MHz specifically in the circuit area of uncharted aerodromes, instead of the current recommendation to use the area frequency. As CASA has already received substantial general feedback on radio frequency use in low level airspace, this consultation asked open-ended questions to explore whether there would be any practical implementation issues or any safety issues raised by the proposal.

## Summary of feedback

CASA received 298 responses to this consultation survey. Figure 1 visually describes the geographic location of respondents. Thirty-one responses were submitted on behalf of an organisation with 29 providing CASA with permission to publish. The organisations that agreed to the publication of their response are listed in Appendix A.

Overall, 173 (58%) of respondents did not identify issues with practical implementation or any additional risks with the proposal.

Of the 42% of respondents that did provided feedback, most of these followed five main themes which is summarised in Table 1:

- Confusion relating to inbound call procedures when applying the proposed frequency boundary for 126.7 MHz in the circuit area of uncharted aerodromes
- Radio congestion/workload issues with frequency changes, especially for sport and recreational aircraft
- Requests for uncharted aerodromes to be added to the aeronautical charts
- Situational awareness concerns with two frequencies in use in the same airspace
- Requests for a comprehensive education and awareness campaign to explain the correct radio procedures.

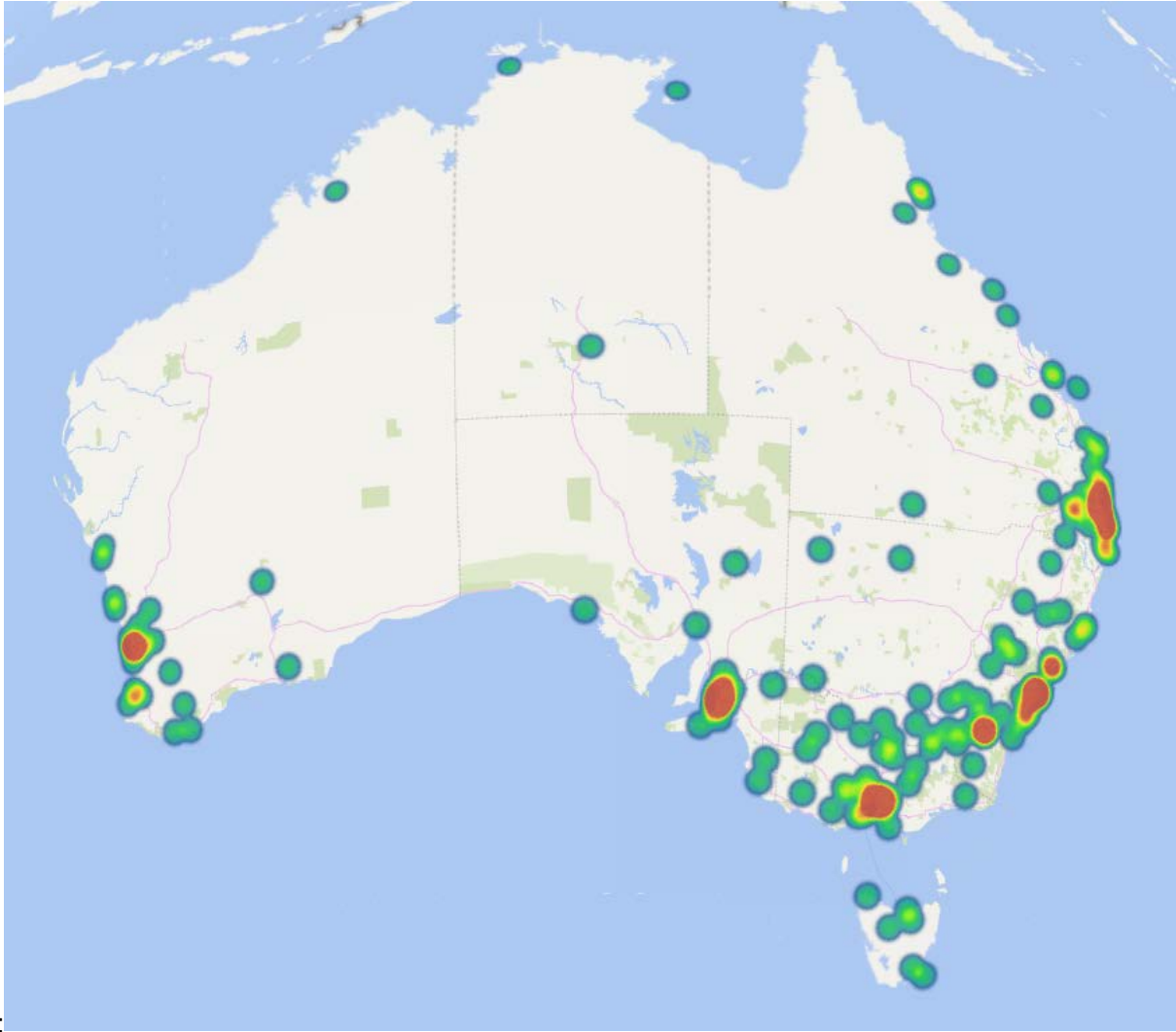


Figure 1: Location of consultation survey respondents - heatmap

Table 1: Summary of issues from consultation

Issue	Summary
<p>Proposed 126.7 MHz circuit area boundary, implications for inbound calls</p>	<p>Thirty-six respondents were concerned about switching frequencies 3NM from the runway of an uncharted aerodrome and that, if required to give an inbound call at this 3NM threshold, it wouldn't give aerodrome traffic enough notice of their presence. Some suggested keeping only the definition and procedures associated with 'in the vicinity' or suggested a different circuit boundary/height for 126.7 MHz.</p> <p><i>Example:</i></p> <p><i>"The Summary of Proposal document states that we are PERMITTED to use 126.7 in the circuit area at uncharted airstrips, which presumably means that we are not permitted to use it outside that area. When and on what frequency do we give inbound calls? If we give them on Area at 10nm, they will not be heard by aircraft in the circuit area. If we give them on 126.7 at 3nm, that is far too close</i></p>

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Issue	Summary
	<p><i>to avoid conflict. What about straight-in approaches? Do we call established at 5nm on area, without any idea if there are other aircraft already in the circuit?"</i></p>
<p>Radio workload, frequency congestion, confusion and complexity)</p>	<p>Thirty-six respondents felt the introduction of a different radio frequency for the circuit area at uncharted aerodromes would mean increased workload (with more frequency changes), frequency congestion on 126.7 MHz, and would add a layer of complexity.</p> <p>Some respondents advised that some recreational and smaller aircraft cannot monitor two frequencies.</p> <p><i>Example:</i></p> <p><i>"I believe it is a big and unnecessary change. It will create congestion, confusion and communication problems. We need more predictable radio frequencies not less. Right now many people at low alt are on the wrong frequencies. This in my opinion will make it even harder to communicate."</i></p>
<p>Situational awareness</p>	<p>Sixteen respondents raised safety concerns around reduced situational awareness, if pilots are operating on different frequencies in the same airspace, or close to other aerodromes with different frequencies.</p> <p><i>Example:</i></p> <p><i>"This proposal will create large numbers of aircraft operating in the Lower Levels of G uncontrolled airspace on different frequencies and without doubt will degrade safety and cause congestion on area frequencies."</i></p>
<p>Mapping for uncharted aerodromes</p>	<p>A few respondents questioned the definition of an uncharted aerodrome, or how they would know if there is one where they are overflying. Ten respondents called for uncharted aerodromes to be added to the Australian aeronautical charts. One respondent also called for the removal of airstrips on charts that are no longer in use.</p> <p><i>Example:</i></p> <p><i>"Great if all uncharted strips could be listed on charts. It would then be possible to ban entry to circuit areas unless the pilot was intending to join that circuit."</i></p> <p><i>Of greater benefit would be the removal from charts of those strips that no longer exist. There is nothing more frustrating to see a strip marked on a chart yet not be able to find it either on Google Earth when flight planning or, when you are overhead looking for a place to land in a hurry."</i></p>
<p>Education</p>	<p>Twenty respondents called for an education campaign to reduce any risks associated with a change to frequency procedures, and to encourage a strong and consistent understanding of the rules and procedures of radio use.</p>

## Safety and risk mitigation

There was a clear message in the responses that the aviation community was seeking a comprehensive education campaign to explain:

- any changes to the procedures for radio use, as well as
- the existing rules and recommendations for radio use in non-controlled airspace.

This was desired regardless of the outcome of the consultation.

To address this, CASA is developing a campaign to assist airspace users to understand and follow the recommended radio procedures and to enhance best practice in radio communication. This will include addressing the issues around radio congestion, irrelevant and unclear broadcasts, frequency confusion, pilot workload and mapping.

CASA will continue to work with industry on the issues raised in the consultation, such as:

- encouraging operators of uncharted aerodromes to arrange for details to be added to the aeronautical charts
- identifying busy aerodromes through RAPAC and other mechanisms, that currently use 126.7 MHz to ascertain whether a discrete frequency would be appropriate
- utilising CASA Aviation Safety Advisors to promote the recommended radio procedures and to improve situational awareness techniques.

CASA also expects situational awareness will improve with continued advances in technology. This includes the development and voluntary uptake of solutions for surveillance equipment, such as low-cost ADS-B (IN/OUT) equipment that is suitable and cost-effective for smaller aircraft.

## Future direction

As a result of the feedback received from the consultation for 'Frequency use in Class G', CASA has determined not to implement the 20 NM/below 5,000ft AMSL proposal or the use of MULTICOM 126.7 in the circuit area of uncharted aerodromes. The AIP will be simplified and less prescriptive about the frequency to use at those aerodromes that are uncharted.

To ensure the feedback from this consultation is addressed, CASA has taken action to:

- simplify the content within the Aeronautical Information Publication (AIP) relating to the selection of radio frequency when operating in Class G airspace and at non-controlled aerodromes
- develop and deliver education materials to reinforce consistent application of radio procedures
- increase the number of aerodromes displayed on the visual aeronautical charts (WAC, VTC & VNC) to provide better situational awareness for pilots and for ease of selecting the most appropriate frequency.

The amendment to AIP relating to radio frequency use will be incorporated in AIP at the AIRAC cycle effective 28 February 2019. Furthermore, Civil Aviation Advisory Publication (CAAP) 166-01 will require minor amendments to support the AIP amendments. We anticipate consulting publicly on that amendment during November 2018.

CASA has already progressed with the development of educational materials that include booklets, updates to the Visual Flight Rule Guide (VFRG) and CASA Flight Planning Kit, e-learning modules and incorporation into Aviation Safety Seminars. This will be a sustained campaign to ensure lasting pilot awareness and consistent application of the recommended procedures.

CASA continues to work with Airservices Australia to incorporate all aerodromes that have been allocated an ICAO four-letter code (e.g. YADY) onto WAC, VNC and VTC charting products whilst considering chart clutter. At time of publishing this document, it is planned that will be progressively rolled out from May 2019.

## **Appendix A**

### **Organisational respondents**

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Aerial Application Association of Australia Ltd - AAAA
Airservices Australia
Arkaroola Wilderness Sanctuary
Air Sport Australia Confederation (ASAC)
AusALPA
behalf of majority of National RAPAC Convenors
Bell Sport Aviation
Caboolture-microlights
Caboolture Warbirds
Chinta Air
Davewood Pty Ltd
Dept for Environment & Water, SA Government
Esperance Aero Academy
Freedom Flight P/L
Gliding Federation of Australia
Goldfields Air Services
Hang Gliding Federation Australia
Honourable Company of Air Pilots
Interspatial Aviation Services Pty Ltd
Lone Eagle Flying School
McNeil Aviation and Colonial Airways
OzRunways
Rainbow Coast Flying School
Recreation Aviation Australia
Rotorwing Helicopters
Royal Federation of Aero Clubs of Australia
Sport Aircraft Club of SA
Wettenhall Air Services
<a href="http://www.OztronixAviation.Com">www.OztronixAviation.Com</a>