# Proposed amendments to Part 139 MOS – new system to reassess aerodrome pavement strength and update AIP ERSA - (CD 2502AS)

# Overview

We would like your feedback on a proposal to amend the Part 139 Manual of Standards (MOS), to enable the implementation of a new Pavement Classification Rating (PCR) system. This would replace the existing Pavement Classification Number (PCN) system.

When introduced, the new PCR would require aerodrome operators to reassess pavement strength and report this information in the Aeronautical Information Publication (AIP) En-route Supplement Australia (ERSA).

This change is part of a global program for reporting pavement strength, with standards specified in Annex 14 to the Convention on International Civil Aviation (the Chicago convention) - Aerodromes, Volume 1. The new pavement strength rating system offers a more accurate evaluation of the strength of airport pavements and provides a better understanding of pavement life.

### Principal changes that would occur

Under the proposed changes to the Part 139 MOS, the following will be required:

* For aerodromes with pavements intended for aircraft with a maximum certificated take-off weight (MTOW) greater than 5,700 kg, aerodrome operators would be obliged to determine and report a PCR value in AIP ERSA.
* For aerodromes with pavements intended for aircraft with an MTOW equal to or less than 5,700 kg, determining and reporting a PCR value would be optional. The aerodrome operator may also elect to publish a weight or tyre pressure value for the pavement.
* If an aerodrome operator is not obliged by the proposed standards to determine and report PCR values, and chooses not to voluntarily do so, the pavement strengths for the aerodrome would be published as ‘unrated’.

**Background and engagement**

In mid-2024, we initiated a PCR Transition Working Group via the National Runway Safety Group, to assist with the transition from the current Aircraft Classification Number/Pavement Classification Number (ACN/PCN) system to the proposed new regulations for Aircraft Classification Rating (ACR/PCR).

The working group has helped to inform a transition pathway. This pathway includes the lodging of a 12-month ‘notification of difference’ with the International Civil Aviation Organization (ICAO) to allow for a transition period.

The working group also assisted CASA to draft an Aeronautical Information Circular (AIC) [(H38/24)](https://www.airservicesaustralia.com/aip/current/sup/a24-h38.pdf) that clearly identifies the procedure for assessing and publishing the PCR arrangements.

# Why your views matter

Your feedback will help us make sure the proposed requirements are suitable, the final legislation is clear and it will work as intended.

Please submit your comments using the survey link on this page.

If you are unable to provide feedback via the survey link, please email regulatoryconsultation@casa.gov.au for advice.

## **Documents for review**

All documents related to this consultation are attached in the ‘Related’ section at the bottom of the overview page. They are:

* Summary of proposed change on CD 2052AS, which provides background on the proposed standards
* Consultation Draft - Part 139 Manual of Standards Amendment Regulations No.1/2025
* MS Word copy of online consultation for ease of distribution and feedback within your organisation.

# **What happens next**

At the end of the response period, we will:

* review all comments received
* make responses publicly available on the consultation hub (unless you request your submission remain confidential)
* publish a Summary of Consultation which summarises the feedback received and outlines any intended changes and next steps.

All comments received on the proposed legislation will be considered. Relevant feedback that improves upon the proposed instrument will be incorporated into the final instrument.

# **Post-implementation review**

CASA will monitor and review the new rules during the transition phase and on an ongoing basis.

# Give Us Your Views

 [Appears on the overview page at the bottom]

Online Survey

[This link is on the front page of the survey and takes you to the survey questions]

**Related**

[This section is at the bottom of the front page and contains all the links to other sites and documents related to this consultation]

**Related Documents**

List of documents attached to the consultation

* Summary of proposed change on CD 2052AS
* Consultation Draft - Part 139 Manual of Standards Amendment Regulations No.1/2025
* MS Word copy of online consultation on Proposed amendments to Part 139 MOS – new system to reassess aerodrome pavement strength and update AIP ERSA - (CD 2502AS)

# Audience & Interest groups

**Audience**

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| * Aerodrome operator
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| * Air operators
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| * Pilots
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| * Air traffic service provider
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| * Part 175 of CASR Aeronautical information service providers
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| * Operations Control/Flight Dispatch
 |
| * Certified aerodrome owner/operator
 |
| * Unregulated aerodrome owner/operator
 |
| * Aerodrome owner/operators
 |
| * CASA aerodrome inspector
 |
| * Aerodrome industry consultant
 |
| * VET and tertiary sector organisations providing aviation theory training
 |
| * Aerodrome industry consultant
 |

**Interest**

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| * Operational standards
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| * Aerodrome Reporting Officer Training
 |
| * Aerodromes
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# Page 1. About this consultation

This consultation asks for your feedback on proposed amendments to the Part 139 Manual of Standards associated with the transition from Pavement Classification Number (PCN) to Pavement Classification Rating (PCR).

We will ask you for:

* **personal information**, such as your name, any organisation you represent, and your email address
* **your consent** to publish your submission
* **your responses** to the proposed changes in the regulations
* **demographic information** to help us understand your interest in the regulations
* **any comments** you may want to provide

Our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public) contains more information on making a submission and what we do with your feedback.

# Page 2. Personal information

## First name

*(Required)*

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## Last name

*(Required)*

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## Email address

*If you enter your email address, you will automatically receive an acknowledgement email when you submit your response.*

Email

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## Do your views officially represent those of an organisation?

## *(Required)*

*Please select only one item*

[ ]  Yes, I am authorised to submit feedback on behalf of an organisation

[ ]  No, these are my personal views.

If yes, please specify the name of your organisation.

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## Which of the following best describes the group you represent?

*Please select all that apply*

[ ]  Aircraft owner/operator

[ ]  Aerodrome operator

[ ]  Aerodrome owner

[ ]  Aviation consultant/contractor

[ ]  Pavement engineer

[ ]  Air Navigation Service Provider

[ ]  Defence Force

[ ]  Other

Please specify ‘Other’ if selected.

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# Page 3. Consent to publish submission

To provide transparency and promote debate, we intend to publish all responses to this consultation. This may include both detailed responses/submissions in full and aggregated data drawn from the responses received.

Where you consent to publication, we will include:

* **your last name** if the submission is made by you as an individual or
* **the name of the organisation** on whose behalf the submission has been made
* **your responses** and comments

We **will not** include any other personal or demographic information in a published response

Do you give permission for your response to be published?

*(Required)*

*Please select only one item*

[ ]  Yes - I give permission for my response/submission to be published.

[ ]  No - I would like my response/submission to remain confidential but understand that de-identified aggregate data may be published.

[ ]  I am a CASA officer.

Information about how we consult and how to make a confidential submission is available on our [website](https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public).

# Page 4. Feedback on proposed Pavement Classification Rating (PCR) amendments

### Principal changes that would occur

Under the proposed changes to the Part 139 Manual of Standards (MOS), the following will be required:

* For aerodromes with pavements intended for aircraft with a maximum certificated take-off weight (MTOW) greater than 5,700 kg, aerodrome operators would be obliged to determine and report a PCR value in AIP ERSA.
* For aerodromes with pavements intended for aircraft with an MTOW equal to or less than 5,700 kg, determining and reporting a PCR value would be optional.
* If an aerodrome operator is not obliged by the proposed standards to determine and report PCR values, and chooses not to voluntarily do so, the pavement strengths for the aerodrome would be published as ‘unrated’.

**Link:** [Consultation Draft - Part 139 Manual of Standards Amendment Regulations No.1/2025](https://consultation.casa.gov.au/%2B%2Bpreview%2B%2B/regulatory-program/copy-of-cd-2502as/supporting_documents/Consultation%20Draft%20%20Part%20139%20Manual%20of%20Standards%20Amendment%20Instrument%202025%20No.%201.PDF)

**Question 1.** Do you agree the proposed amendment to the Part 139 MOS is sufficient for introducing the PCR system in Australia?

*Radio buttons*

[ ]  Agree

[ ]  Agree, with changes (please provide your suggestions below)

[ ]  Disagree (please explain why and provide alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Do you agree with the proposed 5,700kg MTOW break point between mandatory and voluntary assessment and reporting of PCR?

[ ]  Agree

[ ]  Agree, with changes (please provide your suggestions below)

[ ]  Disagree (please explain why and provide alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**General comments**

Do you have any additional comments about the proposed policy? Please include any **impact** this change may have on you or your operation. Please do not include points you have already raised.

Comments

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