Australian Government
Civil Aviation Safety Authority

SUMMARY OF CONSULTATION

Maximum take-off weight limit for aeroplanes managed by approved self-administering aviation organisations

Date	December 2019
Project number	SS 99/05
File ref	D19/383698

Overview

From 30 August to 28 September 2019, CASA published a Discussion Paper (DP) to explore the policy proposition that an Approved Self-Administering Aviation Organisation (ASAO) may administer aeroplanes with a maximum take-off weight (MTOW) greater than 600 kg up to a maximum of 760 kg and sought feedback from industry. The DP sought feedback from the aviation community with regards to the relevance of the stated benefits, the identified risks and the industry impacts more broadly, in relation to potentially amending the Civil Aviation Order (CAO) and relevant regulations to permit three-axis aeroplanes up to a maximum weight of 760 kg to be included as aircraft that could be administered by an ASAO.

The CAO 95.55 (Exemption from provisions of the Civil Aviation Regulations 1988 — certain ultralight aeroplanes) Instrument 2018 provides a scheme of exemptions, subject to conditions, that facilitates the safe operation of ultralight aircraft administered by an ASAO.

Since first published in February 1990 and due to advancements in design, materials, manufacturer capability, regulations and safety of operations, the MTOW of two seat ultralight aircraft operated under CAO Part 95, Section 95.55, has increased from 450 kg MTOW to 600 kg. Currently, the MTOW of aircraft to which the CAO applies is set at 600 kg, in line with the internationally accepted standard for Light Sport Aircraft (LSA) certification.

The discussion in this Summary of Consultation (SOC) is a summary of the main themes that emerged in a review of the responses.

Public consultation is conducted by CASA to seek feedback from the aviation community on specified proposals. Decisions on policy matters are determined by a thoroughly considered evaluation of community feedback (including qualitative and quantitative feedback) and whether appropriate reasons have been presented for modifying current or proposed regulatory policy.

Executive summary

CASA conducted public consultation via a discussion paper DP 1912SS – 'Maximum take-off weight limit for aeroplanes managed by approved self-administering aviation organisations' – from 30 August to 28 September 2019. This detailed the proposition to amend the relevant regulations to permit three-axis aeroplanes up to a maximum weight of 760 kg, regardless of whether the aircraft is equipped to land on water or not, to be administered by an ASAO. Feedback was sought on whether the potential benefits to aviation safety and the aviation community, as outlined in the discussion paper, would likely be realised.

A total of 408 responses were received from individuals and persons representing a group, business or organisation. Most respondents indicated strong support for CASA to consider the policy proposition to increase the MTOW of aeroplanes that an ASAO may administer, with 83% of respondents supporting an MTOW increase up to 760 kg.

The first question asked whether the potential benefits to aviation safety are likely to be realised by implementing this proposal:

- 284 (70%) agreed
- 82 (20%) disagreed
- 42 either did not answer or selected ‘I Don’t Know’.

The second question asked whether the potential benefits to the aviation community are likely to be realised by implementing this proposal:

- 308 (75%) agreed
- 75 (18%) disagreed
- 25 either did not answer or selected ‘I Don’t Know’.

The third question asked industry to consider whether the effect of the proposal on the aviation community would be positive for private recreational aviation:

- 326 (80%) agreed
- 64 (16%) disagreed
- 18 either did not answer or selected ‘I Don’t Know’.

These figures closely aligned with the results received from respondents selecting either Option 1 to retain the current status quo or Option 2 for CASA to consider the policy proposition; the option which was supported by 83% of the respondents.

Seven themes emerged from the feedback. Respondents shared their views on what the maximum MTOW and stall speed could be, how maintenance requirements, medical and flight standards would impact on the policy change and, if introduced, what the impact on safety and cost may be.

- The feedback was generally positive with the following statements repeated throughout many of the written comments: The proposal would benefit the aviation community and have a positive effect on private recreational aviation and that it would stimulate activity in the recreational/private aviation industry across the board.

- An increase in MTOW would result in improved safety through greater structural integrity during manufacture and convenience through access to greater useful loads and carriage of additional fuel.
- It would provide a greater choice for pilots, aircraft owners and amateur/experimental aircraft builders.
- It would likely change the perception of recreational flying and attract new and former pilots into the sector creating greater opportunities in training and maintenance.
- It provides owners of CS-VLA aircraft (built to 750 kg MTOW) a choice of system to operate under.

The consensus among the respondents is that CASA should consider the policy change in line with the DP. However, some respondents said CASA should consider increasing the maximum stall speed limitation above 45 kts to capture those two-seat aircraft with an MTOW of 760 kg or less that would otherwise fit in the category, other than for the fact that their stall speed is greater than 45 kts.

Discussion

The primary aim of the Discussion Paper (DP) was to seek feedback from the aviation community to explore the policy proposition that an ASAO may administer aeroplanes with an MTOW greater than 600 kg up to a maximum of 760 kg. This would be conditional on the organisation conducting only recreational flying activities or flying training and demonstrating to CASA a capability of maintaining an acceptable level of aviation safety.

The proposal is for the establishment of a new operating classification within an ASAO's safety system to manage operations of aircraft within the proposed higher MTOW and above the 600 kg limit which currently exists.

The respondents had the opportunity to express their concerns, raise related issues and offer suggestions and opinions about the proposed changes to the regulations. The collection of both quantitative and qualitative data enabled a comprehensive analysis to be undertaken.

Respondent overview

CASA received 408 submissions; 281 respondents consented to having their comments published. Two types of responses were received—those that expressed the view of a group, business or organisation and those that were opinions of individuals.

There were 34 responses (8%) expressing the views of groups or organisations (Table 1) and 374 (92%) that reflected the views of individuals (Table 2).

Table 1. Responses on behalf of a group, business or organisation

Organisation	Total	Option 1 Maintain Status quo	Option 2 Amend to 760 kg	Option 1 % Maintain Status quo	Option 2 % Amend to 760 kg
Flying schools	15	2	13	13%	87%
Aero clubs	3	0	3	0%	100%
Aviation Interest groups	6	5	1	83%	17%
Self-administering orgs	3	1	2	33%	67%
CAR 30 organisations	2	2	0	100%	0%
Manufacturers/dealers	5	0	5	0%	100%

Table 2 – Views of respondents

Group	Total	Option 1 Maintain Status quo	Option 2 Amend to 760 kg	Option 1 % Maintain Status quo	Option 2 % Amend to 760 kg
Aircraft owner and pilot	207	44	163	21%	79%
Aircraft owner—non-pilot	16	5	11	31%	69%
Pilot—no aircraft ownership	134	14	120	10%	90%
Student pilots	10	0	10	0%	100%
AME/LAME	1	1	0	100%	0%
Other	6	2	4	33%	67%

Submissions were received from all Australian States and Territories (Figure 1).

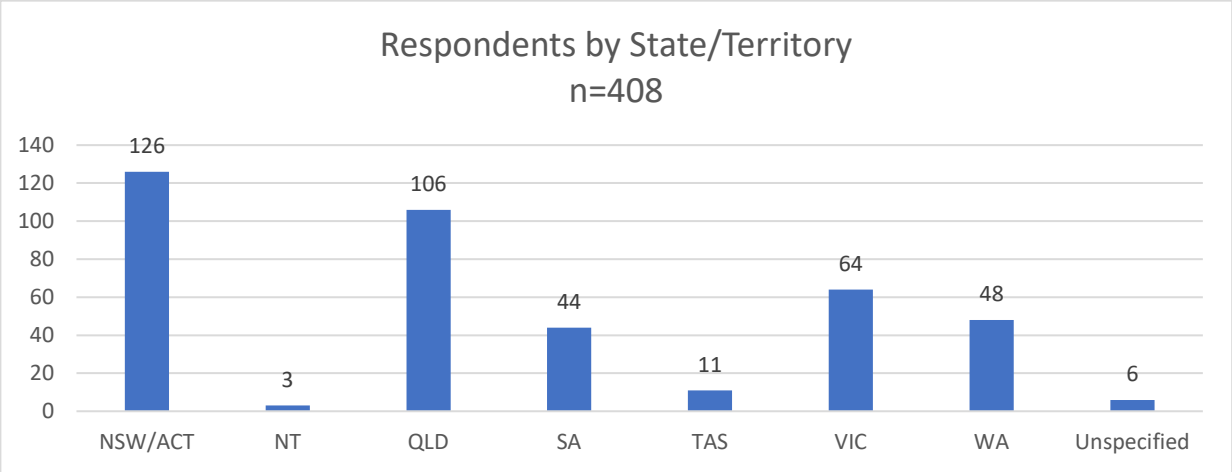

Figure 1 – Location of respondents across total submissions to consultation hub

Qualitative data

The feedback provided by the 408 respondents was in free-text format. The responses varied from brief to lengthy, with each text response requiring a thematic evaluation to obtain qualitative data.

The content and context of each comment was assessed and grouped within common themes established by frequency of reference. The themes are not mutually exclusive; multiple themes can be revealed within a single response.

Key feedback

CASA sought comments and suggestions on the policy proposition and respondents were asked to provide free-text comments on the proposal, limited personal information and to consent, if they wished, to publication of their submission.

Respondents were asked to answer some key questions and select one of three options:

- Option 1: maintain the status quo and make no changes to MTOW limits
- Option 2: support CASA considering the policy proposition to amend CAO 95.55 and relevant regulations to permit three-axis aeroplanes up to a maximum weight of 760 kg to be included as aircraft that could be administered by approved self-administering aviation organisations (ASAO)
- Other option: provide CASA with an idea or policy proposal that had not been considered.

All responses were evaluated and reviewed to determine whether respondents fully supported, partly supported or opposed the proposal.

Option 2 was selected by 289 respondents (71%), 56 respondents (14%) selected option 1, 51 (12%) selected other option, while 12 (3%) did not select an option (see Figure 2).

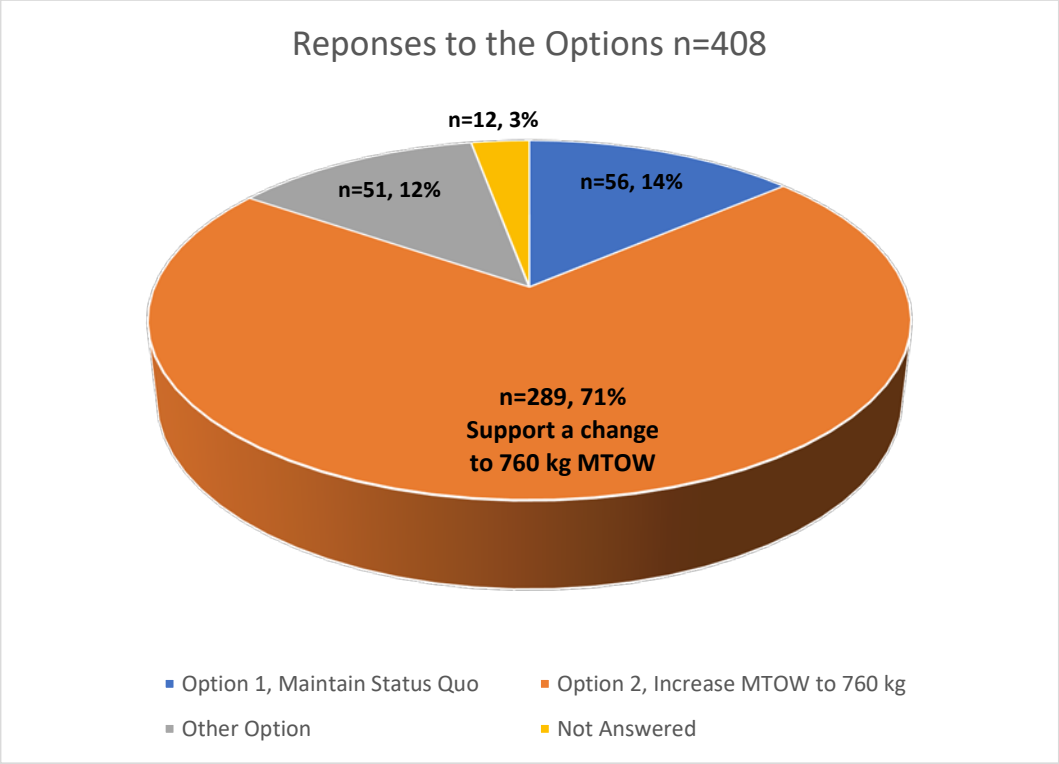

Figure 2 – Results of the options selected

Of the 63 respondents that selected 'Other Option' or left the option choice blank, 48 (76%) supported the policy proposition, 13 (21%) were opposed and two were undefined. This has a combined effect of 82.6% of respondents indicating support for an increase in MTOW.

Key questions answered

Are the potential benefits to aviation safety mentioned in the DP likely to be realised by implementing this proposal?

In response to whether the potential benefits to aviation safety are likely to be realised by implementing this proposal (Figure 3):

- 284 (70%) agreed the potential benefits to aviation safety are likely to be realised
- 82 (20%) disagreed the potential benefits to aviation safety are likely to be realised
- 42 either did not answer or selected 'I Don't Know'.

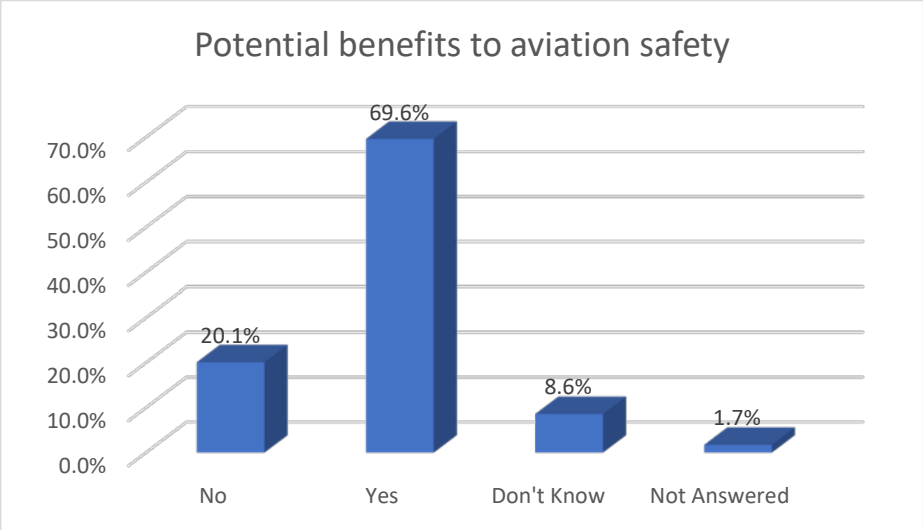

Figure 3 - Are there potential benefits to aviation safety?

Are the potential benefits to the aviation community mentioned in this DP likely to be realised by implementing this proposal?

In response to whether the potential benefits to the aviation community are likely to be realised by implementing this proposal (Figure 4):

- 308 (75%) agreed the potential benefits to the aviation community are likely to be realised
- 75 (18%) disagreed the potential benefits to the aviation community are likely to be realised
- 25 either did not answer or selected 'I Don't Know'.

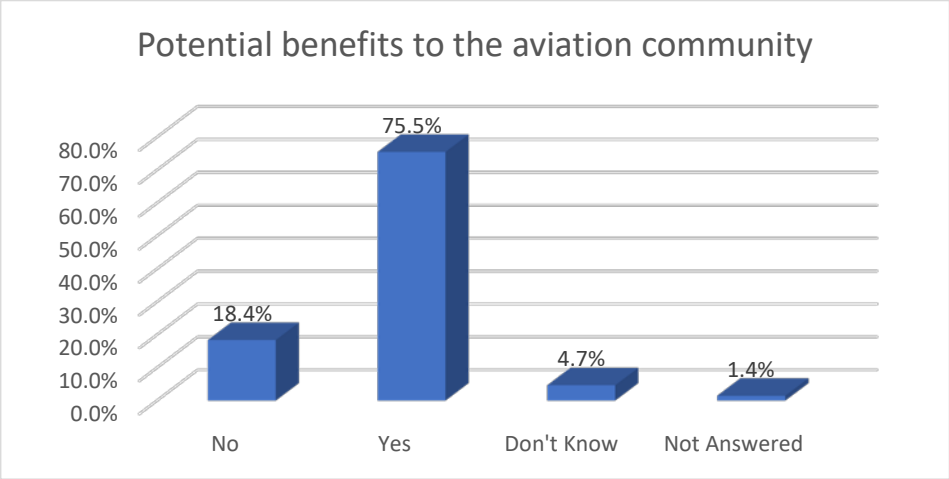

Figure 4 - Are there potential benefits to the aviation community?

Do you consider the overall effect of the proposal on the aviation community to be positive or negative for private recreational aviation?

In response to whether the effect of the proposal on the aviation community would be positive or negative for private recreational aviation (Figure 5):

- 326 (80%) answered the effect of the proposal would be positive on the aviation community
- 64 (16%) answered the effect of the proposal would be negative on the aviation community
- 18 either did not answer or selected 'I Don't Know'.

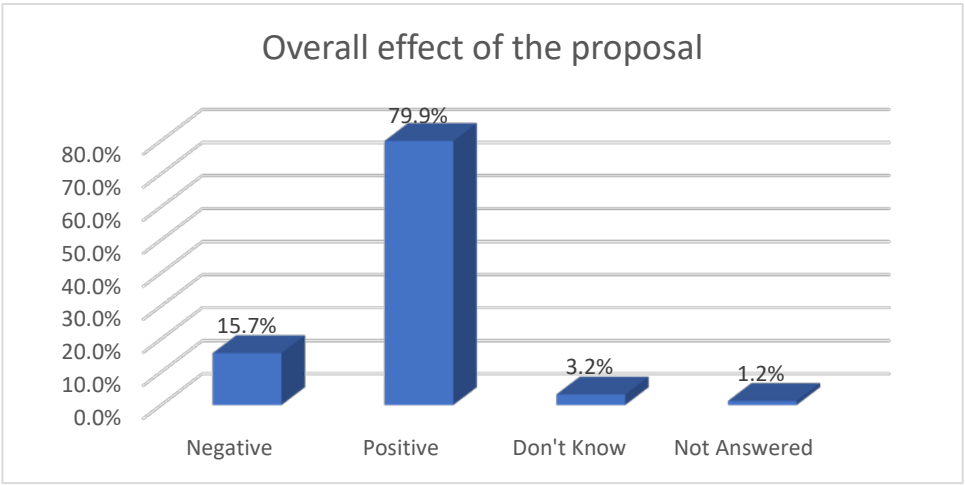

Figure 5 – Is the overall effect of the proposal on the aviation community positive or negative for private recreational aviation?

Does the proposal affect you as an individual positively or negatively?

In response to whether the proposal affects individuals positively or negatively:

- 261 (64%) answered the proposal would have a positive effect on individuals
- 52 (13%) answered the proposal would have a negative effect on individuals
- 95 either did not answer or selected 'I Don't Know'.

Does the proposal affect your aviation business positively or negatively (if applicable)?

Some respondents named their flying school, club or organisation as a part of their response. However, their feedback did not represent the views of the particular aviation business. Accordingly, the following figures are different to those presented in Table 1 and 2 above:

- 55 (14%) answered the proposal would have a positive effect on aviation businesses
- 16 (4%) answered the proposal would have a negative effect on aviation businesses
- 337 either did not answer or selected 'I Don't Know' due to applicability.

Options discussed

Option 1—Maintain the status quo and make no changes to MTOW limits

Option 1 was preferred by 69 respondents which represented 16.9% of the total. Several reasons were cited for not supporting the proposal which included concerns over flight standards, medical requirements and the cost to industry participants. Of the 69 respondents that opposed the proposition, 33 (48%) indicated the policy does not provide any discernible benefits to aviation safety, seven suggested a potential reduction in safety and two stated safety would be reduced. Most of the feedback did not provide specific justification to support the comments (see Appendix A). Instead, many referred to the equality of standards across both schemes (under self-administration or CASA) to consider a scenario where there would be no discernible difference in operating aircraft up to 760 kg MTOW in either scheme.

The two schemes for operating light recreational aeroplanes for private use provide choice to industry participants. Both schemes offer different operational privileges. It is not the purpose of the DP to consider CASA's policy on whether the two schemes should be amalgamated—only the policy proposition on the scope of aircraft that can be administered by an ASAO under the Part 149 safety scheme is being discussed.

Option 2—Amend the MTOW limits and associated matters in CAO 95.55, Part 149 MOS and develop Part 103 and the Part 103 MOS to reflect these matters

Option 2 was directly selected by 289 which represented 71% of the responses. This option was supported by a further 48 respondents through other selections and comments. The combined support for Option 2 (fully and partially) equates to 337 of the 408 respondents (82.6%).

The comments often indicated the increase was overdue and would provide greater opportunity for the aviation community and participants through:

- increased aircraft utilisation
- additional choice of aircraft types
- safety through robustness of design and greater fuel capacity
- the ability to register aircraft manufactured up to 750 kg MTOW under CS-VLA or CS-23 with an ASAO or CASA.

While these themes were recurring, the comments were generally not substantiated with examples or evidence in support of the statements made (see Appendix A).

Of the 408 respondents, there were 84 respondents (21%) who selected either Option 2, or selected 'Other option' and further remarked that CASA should consider changes to the policy proposition presented in the DP (e.g. higher weight increase, higher stall speed, etc).

Other option tab

This option provided the opportunity for respondents to provide additional concepts and options not considered under the DP for consideration by CASA. Overall, 51 (12%) of the respondents selected 'Other option'. Eleven responses under this option (22%) opposed the proposition, 39 (76%) stated they supported an increase in MTOW and one response was undefined. Respondents selected 'Other option' to suggest additional concepts or themes to be considered by CASA as part of the policy discussion. These included increasing the maximum stall speed in landing configuration, consideration of owner maintenance for private operations and varying the MTOW to other than 760 kg.

Key themes

Seven key themes were identified using the methodology described at Appendix A and are depicted below in Table 3. Two of the key themes, flight standards and maintenance standards, directly related to stated conditions within the proposal. Samples of feedback received for each of the key themes can be found at Appendix C. This section provides an overview of the key themes and a sample of indicative responses.

Table 3 - Key themes

Theme	Explanation
Safety/risk	This theme focussed on respondents' views that implementing the policy proposition would have a positive, negative or neutral impact on the safety of air navigation.
Cost	This theme focussed on respondents' views of how this element impacts on the outcome of the proposal.
Stall speed	This theme focussed on respondents' views that CASA could consider additional changes to the policy in relation to this element of the proposal.
Flight standards	This theme relates to the provisions for flight training, checking, examination, experience and recency and how this element impacts on the outcome of the proposal.
Medical requirements	This theme focussed on respondents' views that CASA could consider additional changes to the policy in relation to this element of the proposal.
Maintenance standards	This theme relates to the provisions for maintenance standards and views on how this element impacts on the outcome of the proposal.
MTOW	This theme focussed on respondents' views that CASA could consider further measures to this element of the proposal.

Theme 1 – Safety/risks

Safety was the most common theme named throughout the responses with 205 (50%) of responses addressing safety and/or risks associated with implementing the policy change.

Of the 205 comments:

- 123 (60%) considered safety would be enhanced
- 72 (35%) considered there would be no net benefit to safety
- 10 (5%) considered safety would potentially be reduced.

Theme 2 – Cost to industry

The cost impact of introducing the MTOW increase was referenced by 91 respondents (22.3%) with:

- 49 (12%) indicating an expectation the cost will be less
- 32 (7.8%) citing cost would be an issue
- 7 (1.7%) believed operating costs would increase
- 3 (0.7%) indicated there would be no net benefit.

Theme 3 – Variation of stall speed

Raising the maximum stall speed in the landing configuration above 45 kts was the dominant theme by respondents who selected ‘Option 2’ and left a comment, in addition to those who selected ‘Other Option’. However, the stall speed limitation was also raised as an issue by several respondents who selected Option 1.

Seventy one (17.4%) responses commented on the 45 kt stall speed limitation, with 35 (8.6%) leaving a comment on this theme after selecting Option 2, 27 (6.6%) selecting ‘Other option’ in lieu of ‘Option 2’ to leave a similar comment and nine (2.2%) raising the limitation as a concern after selecting Option 1, electing to retain the status quo.

Theme 4 – Flight standards

This theme was referenced by 71 (17.4%) of the 408 respondents with 42 (10.3%) saying the differences (perceived or otherwise) between the training standards under the self-administration scheme and CASA requirements would be an issue; however, 29 (7.1%) believed the introduction of the additional range of aircraft in itself would have a positive effect on safety, nominally through the additional training that would occur for pilots to convert to type (training, checking and examination), as well as the likelihood of ongoing utilisation (experience and recency).

Theme 5 – Medical requirements

References to the self-administration system of pilot medical self-certification was addressed by 63 respondents (15%), with 37 responses (9%) suggesting this theme form a more significant part of the current policy proposition. The comments suggested that CASA should consider a policy change to more closely integrate the two schemes (self-administration and CASA requirements) into one and eliminate the two different schemes for private, general and recreational aviation.

Theme 6 – Maintenance standards

This theme was referenced by 35 (8.6%) of respondents; 22 (5.4%) were against retaining the use of CAR 30 organisations for maintenance, suggesting instead that maintenance be oversighted under the ASAO’s safety scheme. However, 11 (2.7%) supported continued CAR 30

oversight of maintenance for aircraft above 600 kg MTOW. Additionally, two respondents suggested an alternate option of the introduction of a single aircraft maintenance and engineering standard for aircraft operated by private GA and under self-administration.

Theme 7 – MTOW limit

Comments about the MTOW limit were referenced by 21 (5%) of the respondents with 17 (4%) suggesting the MTOW limit should be higher than 760 kg and 4 (1%) suggesting the limit be lower than 760 kg (in two cases lower than 600 kg).

Quantitative data

The 408 responses were initially assessed to broadly determine whether the respondents opposed or supported the proposal. Figure 6 shows that support for Option 1 equated to 16.9% of the respondents, support for Option 2 (both full and partial) was 82.6% and two of the responses were undefined.

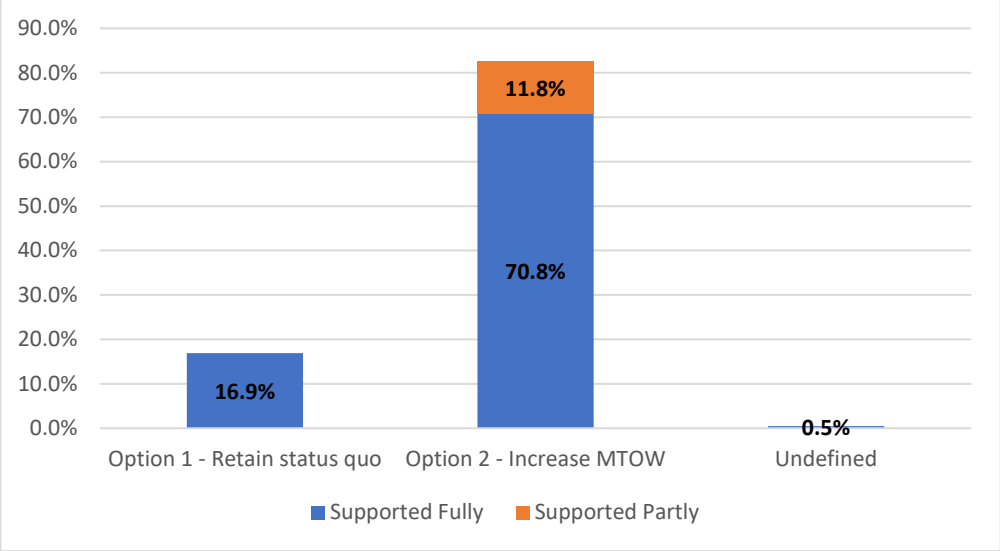

Figure 6 – Overview of whether the policy proposition is supported or opposed

Option receiving majority support

Option 2 received majority support from the aviation community, with 337 (82.6%) of respondents in favour of amending the MTOW limit as presented in the discussion paper. Of the 337 in favour, 244 responses fully supported the proposition. An additional 54 supported Option 2, but also suggested the scope of the proposition be expanded to include an increase to the maximum permissible stall speed in landing configuration and/or to permit owner maintenance. These themes were also supported by 39 respondents that selected 'Other option', with 24 of the 39 (62%) supporting the change in MTOW but with a higher stall speed. Combined, 93 (23%) supported Option 2, but collectively suggested further consideration should be given to four main themes (see Figure 7).

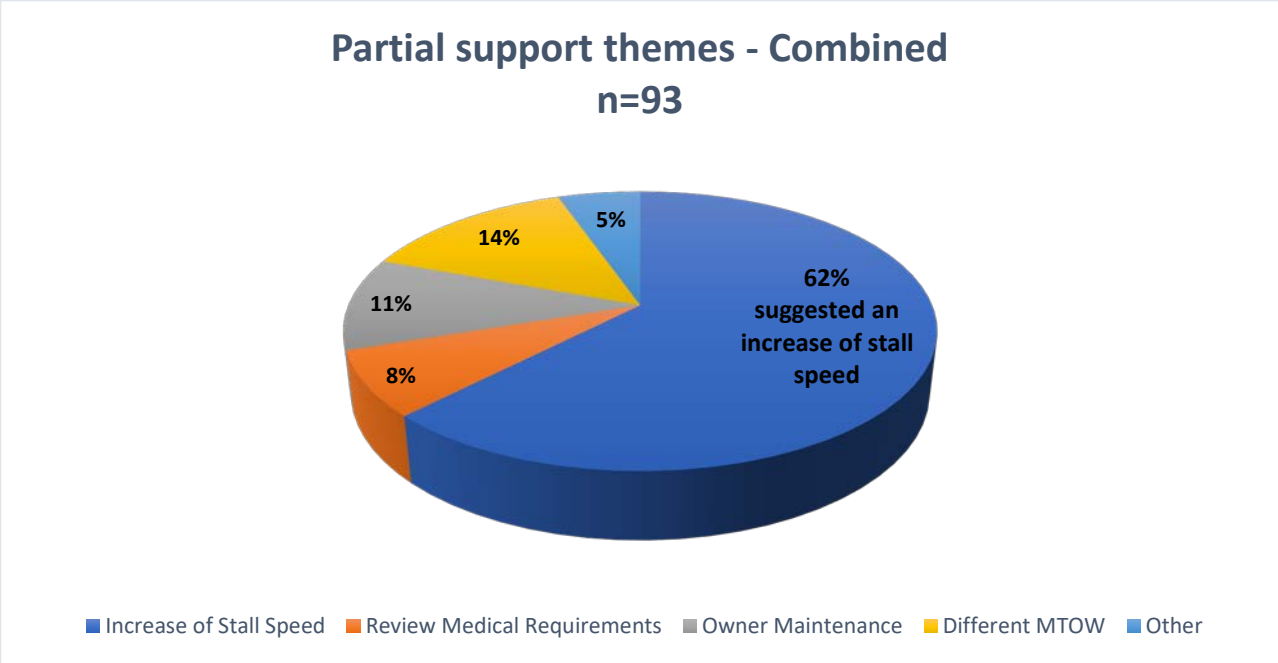

Figure 7 – Common themes suggested by respondents for consideration

Option that did not receive majority support

Option 1—to maintain the status quo for MTOW limits—received limited support. Of the 69 respondents (16.9%) who opposed the proposition, 31 (44.9%) referred to the need for a review of medical standards and/or pilot and instructor training standards. Other themes included references to cost issues and the need for reduced regulation across general aviation (see Figure 8). Many responses contained combinations of these themes. For example, 14 responses that opposed the proposition quoted combined concerns about flight standards, medical requirements and cost.

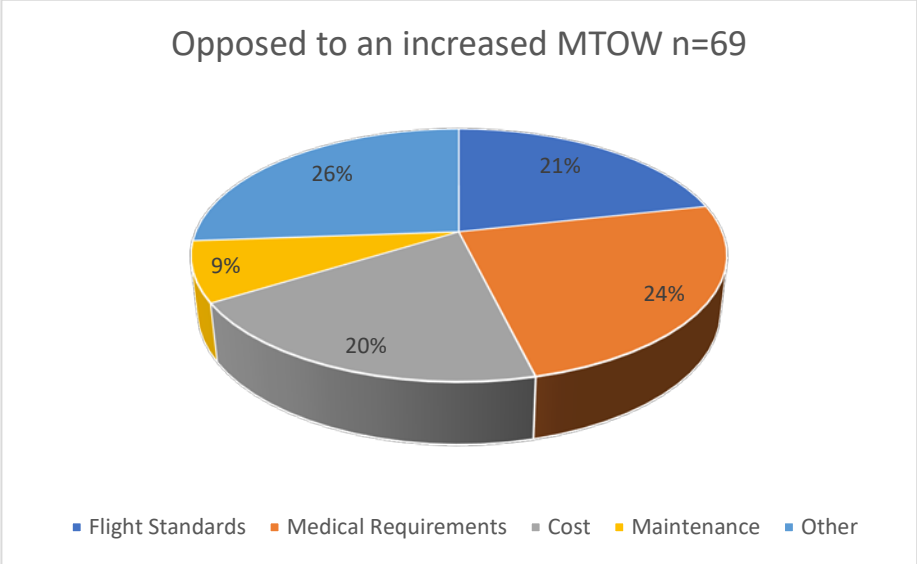

Figure 8 – Common themes by respondents that opposed the proposition

Summary

CASA appreciates the contributions made by the respondents and acknowledges the feedback as beneficial to the effectiveness of the policy discussion.

Whether the responses were for or against the proposal, CASA notes the feedback provided and acknowledges that if the policy proposition is accepted, reasonable and proportionate safety measures will need to be implemented appropriate to the operational environment. For example, the discussion highlighted the following key points for consideration in the interests of safety:

- flight standards
- aircraft maintenance (amateur-built versus certificated)
- maximum acceptable stall speed in landing configuration.

The DP addressed these points in the following manner:

- An ASAO is to develop a pilot training, checking and examination syllabus and structure acceptable to CASA.
- For aircraft with an MTOW between 601 kg and 760 kg, maintenance of:
    - certificated aircraft will be required to be maintained by a CAR 30/CASR 145 organisation
    - amateur-built aircraft maintenance by the builder may only be performed in accordance with acceptable procedures under Instrument 10/19.
- The MTOW and maintenance requirements of LSA certificated aircraft remain unchanged.
- The stall speed is proposed to be set at 45 kts in landing configuration.

Future direction

Overall, respondents have strongly supported the proposition that an ASAO may administer aeroplanes with an MTOW greater than 600 kg up to a maximum of 760 kg. As a result, CASA will initiate the development of drafting instructions with consideration of the detail within the DP and feedback received. The draft will be published for further consultation.

Additionally, feedback on the maximum stall speed limitation for aircraft up to 760 kg MTOW will be evaluated and reviewed by CASA; any change to this limitation of 45 kts will also be published with the future consultation.

The next step is for CASA to engage with the aviation community regarding draft changes to the legislation by way of a Summary of Proposed Change (SOPC). The SOPC will include a draft of the amendments to the relevant standards which will reflect CASA's policy. This engagement will be the final opportunity for consultation prior to making the changes.

Appendix A

Methodology

A.1 Methodology

Respondents were asked to complete an online questionnaire and provide free-text feedback on the DP 1912SS – Maximum take-off weight limit for aeroplanes managed by approved self-administering aviation organisations (ASAO).

Relevant pages published on the consultation hub are provided at Appendix B.

No restrictions were applied to the free-text section. Respondents had the opportunity to voice their views on the proposal at a general or specific level.

All submissions were reviewed and analysed. Both quantitative and qualitative analyses were applied to the data to measure engagement and levels of support.

A.2 Content analysis

Each submission was systematically evaluated and coded to determine the key issues and themes expressed in the responses. The key issues and themes of each response were highlighted and tagged according to categories that 'revealed themselves in the data'. This process was undertaken several times to ensure consistency and validity for the themes associated with each response.

Once the data had been categorised, the frequency of responses was collated and presented in the form of charts and graphs. However, the key to understanding this information is to remember that, by quantifying the data, some richness of meaning is lost. To allow the reader an insight into some of the nuances and depth of meaning behind each category, examples of feedback have been included in the results. Feedback is attributed to the respondents via anonymous ID labels as an additional level of information. The quotes are 'examples only' to show samples of what was considered during the categorisation stage of the analysis.

A.3 Explaining the codes and categories

The first level of categorisation measured the level of support for the proposal or aspects of the proposal; overt statements of support or opposition were not the only relevant information. The responses were grouped according to both overt statements of support or opposition, and by analysing the tone or related comments in the response. Except for those cases where respondents overtly stated their support or opposition for the proposal, there was often a level of ambiguity in responses. Some respondents did not specify direct support or opposition but made suggestions as to their preferred requirements. Where these aligned entirely with the proposal, they were counted as 'fully supported'. Respondents who made it clear they supported more extensive requirements beyond the proposal, were also counted as 'fully supported'. Where respondents only liked one or some elements of the proposal they were counted as 'partly supported'.

When assessing the level of support as a proportion of responses, the percentage was calculated based on the number of qualitative responses provided (i.e. 227 out of 408 total submissions).

A.3.1 Those who fully support

Responses included in this category were identified by the following characteristics:

- Selection of Option 2.
- A direct statement of support.
- Suggestions that aligned fully with the proposal.
- Any of the above, plus suggestion(s) for an increase of MTOW that does not align with 760 kg.
- Positive responses to the key questions.
- No repudiation of any elements of the proposal.

Examples of feedback

> Step in the right direction. (ANON-8J71-3NKK-1)
>
> This would be a significant positive step forward for recreational pilots in this country. (ANON-8J71-3NVA-2)
>
> It would improve the efficient use of the present fleet, plus give manufacturers of 600 to 760 kg aircraft a larger marketplace. (ANON-8J71-3NVY-T)

A.3.2 Those who partly support

Responses included in this category were identified by the following characteristics:

- Positive responses to the key questions.
- Overt acknowledgement that one or multiple elements of the proposal were acceptable.
- A generally supportive tone to this proposal and/or some form of regulatory response, but where they didn't have as positive a tone as those who 'fully supported'.
- Sometimes the delineation is blurry. For instance, where a respondent stated they 'mostly support' the proposal but oppose one aspect of it, their response is included in this category. Additionally, where a respondent says they 'totally reject the proposal…except for [one component]', their response is also included here.

Examples of feedback

> MTOW should be greater than option two. (ANON-8J71-3NTX-Q)
>
> The MTOW needs to be increased to at least C172 level MTOW. This would give pilots the opportunity to gradually move to larger aircraft to complete their CPL and then move on to other larger aircraft. (ANON-8J71-3NK7-D)
>
> Remove any stall speed restriction as this does not need to be included as it should be simply part of endorsement training as it is in other areas of aviation. (ANON-8J71-3NQG-3)

A.3.3 Those who oppose or strongly oppose

Responses included in this category clearly stated opposition or had nothing positive to say about any part of the proposal (i.e. 'totally reject', 'strongly oppose'). As with the previous 'partly supported' category, the delineation is not always clear.

Examples of feedback

> It would create more work and costs that the industry cannot afford. (ANON-8J71-3NTQ-G)

> If it's not broke don't fix it. What we have in place addresses both systems without parallel duplication. (ANON-8J71-3NVE-6)
>
> There are established methods for up skilling to fly heavier aircraft without this mtow increase. The inequity here is the medical requirement why not have a simpler medical regime that is available to all pilots (licensed or certified) for a category of aircraft up to 750 kg mtow. This should not be the exclusive domain of RAA. (ANON-8J71-3NPT-F)

A.3.4 Strong opinions about regulation and CASA

These responses have been included in the analysis and were used to assist with identifying key themes.

Examples of feedback

> Yes, It is disappointing that CASA continues to ignore world's best practice by encouraging duel standards, rather than one harmonised industry. Safe should simply be safe. (ANON-8J71-3NWH-A)
>
> CASA have woke up, that they can further fragment by introducing this proposal. It is time that CASA understood the best way to improve Safety is by COST CUTTING. (ANON-8J71-3NWA-3)
>
> Yet another convoluted CASA attempt to steer money to a private body and enable the body to indulge in what amounts to unauthorised taxation. (ANON-8J71-3NWR-M)

Appendix B

Extracts from the consultation hub showing directions to respondents and the layout of the questionnaire form

Introductory text

We would like your feedback on the proposed Maximum Take-Off Weight increase for aeroplanes managed by an approved self-administering aviation organisation.

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
- any comments you may want to provide
- demographic information to help us understand your interest in the regulations.

Unless an answer is required or mandatory, you can answer as few or as many of the questions as you like.

When you have completed the consultation, click the 'Finish' button at the bottom right of this page.

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

To be notified of any future consultations, you can subscribe to our consultation and rule making list. https://mailinglist.casa.gov.au/lists/?p=subscribe&id=3

Personal information

First name?

(Required)

Last name?

(Required)

Email address?

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

Email

Do your views officially represent those of an organisation?

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 the organisation.

Which of the following best describes the group you represent?

(You may select multiple groups if applicable to your situation)

Please select only one item

☐ CASA Licence holder

☐ Pilot Certificate holder (RAAus)

☐ Self-administering aviation organisation (please specify below)

☐ Aircraft Maintenance Engineer (AME, LAME)

☐ Recreational aircraft maintainer

☐ Aircraft owner (VH registration)

☐ Aircraft owner (Non – VH registration)

☐ Aviation interest group (please specify below)

☐ Government agency in infrastructure portfolio (Airservices, ATSB etc)

☐ Other Federal Government agency

☐ Flight training school (Part 142, 142)

☐ Recreational flight training school

☐ Aircraft manufacturer

☐ Other

Please specify if you have selected “Other” or ‘Aviation interest group’.

Please enter your Post Code below

Consent to publish your submission

In order to provide transparency and promote date, 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 name**, if the submission is made by you as an individual or
- **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 the CASA website https://www.casa.gov.au/rules-and-regulations/landing- page/consultation-process.

Submitting your feedback and key questions answered

Please review the information in discussion paper 1912SS and provide your feedback regarding the options that have been presented. There is a general comments page at the end of this consultation where you can comment on any additional options or concerns not covered in the discussion paper.

Listed below are the answers to some key questions you may have.

Why is this change being considered?

The proposal to increase the MTOW limit presently imposed by CAO 95.55 may align the simplified certification schemes to a known simplified operational scheme. The proposed amendment also facilitates access for almost 10,000 pilot certificate holders and student pilots to a larger variety of aircraft.

What regulations are related to this proposal?

The proposal is to amend MTOW values that are specified in CAO 95.55, Part 149, the Part 149 MOS, Part 103 and the Part 103 MOS. Details of proposed changes would be identified and consulted as a separate proposed rule change consultation following this discussion paper, should it occur.

Does this mean CASA is privatising the private flying sector?

No. Privatisation means the act of selling an industry, company or service that was owned and controlled by the government, so it becomes privately owned and controlled. CASA has not and does not intend to sell any section of the industry. A scheme of self-administration was introduced in Australia over 25 years ago, which as of 14 July 2019 has a new regulatory framework called Part 149.

CASA always retains the responsibility and ultimate oversight of the entire private flying sector including those that are managed by an ASAO.

Why does CASA have self-administering organisations?

This Discussion Paper does not discuss the regulatory framework and objectives associated with Part 149. For information regarding that regulation readers are encouraged to review the regulation and MOS available on the CASA website and the associated Explanatory Statement available on the Federal Register of Legislation website.

Does CASA retain responsibility for the operations?

Section 9 of the Civil Aviation Act 1998 (the Act) outlines the functions of CASA. These are the functions of CASA even when an industry-based organisation holds an approval under Part 149 as an ASAO. In other words, CASA approves such an organisation to administer certain aviation functions but retains the overarching responsibility for safety in the sector.

If I currently operate an aircraft between 601 kg and 760 kg, would I have to join the ASAO?

No. A pilot or registered operator could continue to operate within the CASA scheme. There would be no obligation for any person to join an ASAO.

It is worth noting that the CASA issued Recreational Pilot Licence (RPL) authorises a pilot to operate as pilot-in-command of a single engine, Part 47 registered aircraft up to 1500 kg MTOW, potentially with four persons on board. The RPL has greater privileges, and associated risks, than that of a person operating under a recreational self-administering scheme, who is restricted to a two-person operation and a significantly reduced MTOW (smaller aircraft). An RPL holder may elect to operate aircraft at a lower MTOW or less seating capacity; however, they are not restricted in doing so and are managed according to the extent of the privilege of the licence.

Has CASA already made a decision?

No. Prior to making a final decision, CASA will consider all responses submitted. For CASA to consider your feedback it must be submitted using the online CASA Consultation Hub. A link is provided in the next section of this Discussion Paper.

The fact bank below contains the discussion paper for this consultation.

FACT Bank: Discussion paper 1912SS [In online consultation]

Questions

Are the potential benefits to aviation safety mentioned in the DP likely to be realised by implementing this proposal?

Please select only one item

☐ Yes, they are likely to be realised

☐ No, they are not likely to be realised (please specify why below)

☐ I don't know

Comments

Are the potential benefits to the aviation community mentioned in this DP likely to be realised by implementing this proposal?

Please select only one item

☐ Yes, they are likely to be realised

☐ No, they are not likely to be realised (please specify why below)

☐ I don't know

Comments

Do you consider the overall effect of the proposal on the aviation community to be positive or negative for private recreational aviation?

Please select only one item

☐ Positively (please specify how below)

☐ Negatively (please specify how below)

☐ Not applicable

Comments

Do the changes mentioned in the proposal affect you as an individual positively or negatively?

Please select only one item

☐ Positively (please specify how below)

☐ Negatively (please specify how below)

☐ Not applicable

Comments

If applicable, does the proposal affect your aviation business positively or negatively?

Please select only one item

☐ Positively (please specify how below)

☐ Negatively (please specify how below)

☐ Not applicable

Comments

Options for discussion

Please indicate below which option you prefer.

Option 1 - Maintain the status quo and make no changes to MTOW limits

This option would result in no changes to CAO 95.55 and the Part 149 MOS to extend the range of aeroplanes that an ASAO may administer. That would mean that CASA administration of aeroplanes above 600 kg MTOW would continue.

Option 2 – Amend the MTOW limits and associated matters in CAO 95.55, Part 149 MOS and develop Part 103 and the Part 103 MOS to reflect these matters

This option would form the basis of CASA policy to accept light aircraft up to 760 kg MTOW that meet requirements to be administered by an ASAO.

The potential benefits to pilots and aircraft owners might include:

a. Increased aircraft utilisation.

b. Increased maintenance opportunities.

c. Access to a larger number of aircraft with broader operating envelope.

d. Choice to either register and operate their aeroplanes under an ASAO, or with CASA.

e. Increased choice of holding a Part 61 licence and a pilot certificate.

Please select only one item

☐ I agree with option 1

☐ I agree with option 2

☐ Other option. If you have selected 'other' please specify.

Comments

General Comments

Do you have any additional comments about the proposed Maximum Take-Off Weight increase for aeroplanes managed by an ASAO?

(Please note, this should not include points you have already raised in this consultation)

Comments

Appendix C

Sample feedback for each consultation question and associated themes

B.1 Consultation Questions

Figure 9 shows the number of responses that referred to each of the consultation questions.

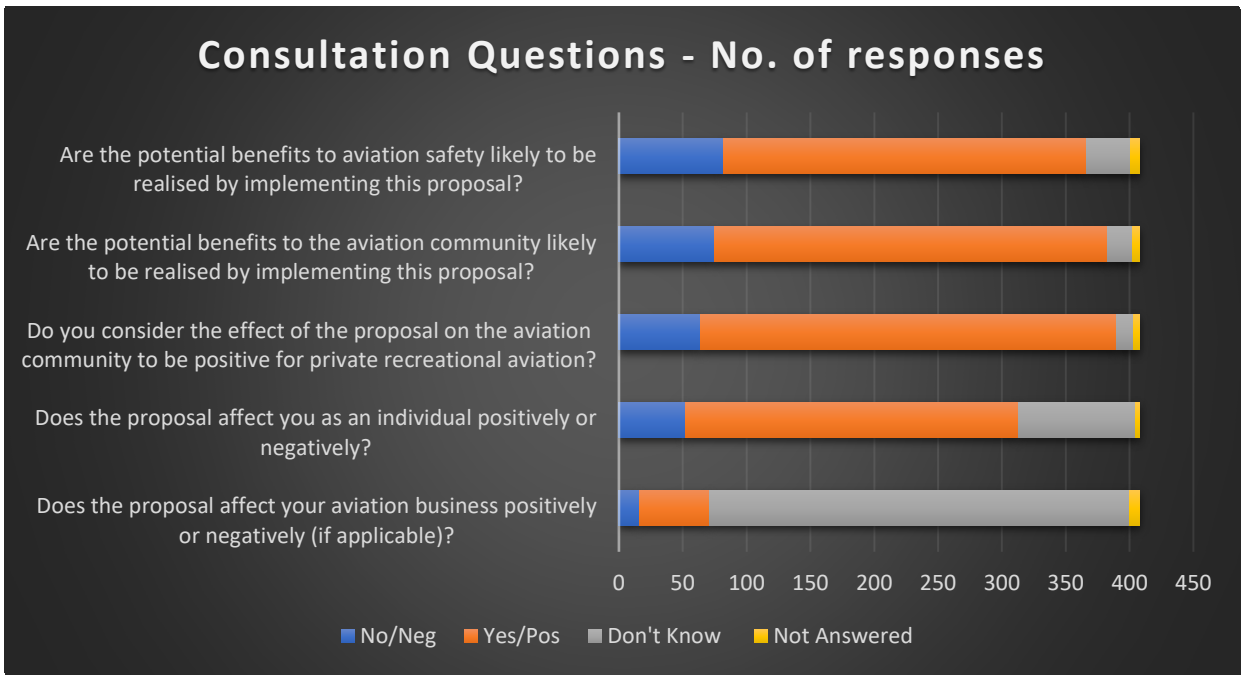

Figure 9 – Responses across the total submissions to the consultation hub

B.2 Are the potential benefits to aviation safety likely to be realised by implementing this proposal?

In response to if the potential benefits to aviation safety are likely to be realised by implementing this proposal; 284 (70%) agreed, 82 (20%) disagreed and 42 either did not answer or selected 'I Don't Know'.

The following are examples of comments from respondents:

> Increasing the range of aircraft available to recreation aviators will increase participation and also the selection of planes with different and better capabilities that a higher weight limit will provide. (ANON-8J71-3NTB-1)
>
> Not unless this becomes a world wide standard weight. (ANON-8J71-3NTQ-G)
>
> The increase in weight will enable manufacturers and builders to put more strength into the air frame of an aircraft without compromising the aircraft's carrying capacity. A heavier aircraft is more stable in turbulent air and therefore safer. This will make the future aircraft built under a 760kg limit stronger and safer with longer range, adding to the versatility of their use as well as there safety. (ANON-8J71-3NCA-F)
>
> No one can answer this, best to look at overseas experience. In theory there are possible benefits. (ANON-8J71-3N3E-3)
>
> Data reveals whether you implement or not safety would continue as newer designed aircraft are becoming safer. No reason not to remove the red tape hinderance that currently is bogging aviation down in this country. (ANON-8J71-3NDN-W)
>
> Safety has nothing to do with regulations or lack of them. (ANON-8J71-3NKU-B)

B.3 Are the potential benefits to the aviation community likely to be realised by implementing this proposal?

In response to if the potential benefits to the aviation community are likely to be realised by implementing this proposal; 308 (75%) agreed, 75 (18%) disagreed and 25 either did not answer or selected 'I Don't Know'.

The following are examples of comments from respondents:

> More aircraft useage/hire, equals more work for maintainers, equals economic benefit to the Aviation sector. (ANON-8J71-3NKX-E)
>
> Many more pilots will use this change which will benefit the industry. (ANON-8J71-3NWF-8)
>
> Bigger is not necessarily better, the concentration on larger and larger will ultimately wreck the very fabric of the more affordable aviation sector. (ANON-8J71-3NSM-B)
>
> The benefits cannot accrue by virtue of regulations to the broader aviation community, but they will only accrue to existing RAA members with existing aircraft. However, it is likely that, because lesser medical standards are available EXCLUSIVELY to RAA members, even more pilots that already find themselves unable to renew a CASA medical will move to the laxer self-certified medical option in RAA. I question if this is in the broader public interest. (ANON-8J71-3NSF-4)
>
> Of course, the weight increase means less accidents, better outcomes and better preparation. (ANON-8J71-3NVV-Q)
>
> Increasing the allowable MTOW will allow the design potential for some aircraft to be realised. For example the Sling 2 was designed with an MTOW of 700kg. This aircraft has a heavier empty weight than some others and at 600kg has limitations on payload and fuel. At 760kg the design limit of 700kg would apply and the payload-fuel limitation disappears. In this sense it may stimulate more people to go flying but I doubt it. The increase in MTOW might result in people doing more flying because they can take their luggage and fly further between refueling stops but it might also mean that people making such journeys have downsized from a bigger aircraft therefore not resulting in more flying overall. (ANON-8J71-3NJX-D)

B.4 Do you consider the effect of the proposal on the aviation community to be positive for private recreational aviation?

In response to if the effect of the proposal on the aviation community would be positive or negative for private recreational aviation; 326 (80%) answered positive, 64 (16%) answered negative and 18 either did not answer or selected 'I Don't Know'.

The following are examples of comments from respondents:

> The way the proposal is worded seems to be framed so that one particular ASAO can be given an advantage by allowing more potential aircraft to be admitted into their jurisdiction through an increase in MTOW from 600 to 760kg. The problem for the wider aviation community is that other groups outside this particular ASAO cannot see from the proposal how they can share in some (other) benefits and not just be simply disadvantaged. For example, it is conceivable that flying schools located at major airports in class D and class C airspace would likely find economic survival very difficult if and when the ASAO can offer comparable training at lower cost at further afield airports. However, if such flying schools did not have barriers against conducting

> training operations both within the ASAO and outside for Part 61 flight crew licences using appropriate aircraft, then they would not just be simply “disadvantaged” by the proposal to increase MTOW for aeroplanes managed by an ASAO. (ANON-8J71-3NJF-U)
>
> Especially in rural areas the system of having light aircraft registers in 2 different systems increases the complexity of licensing to fly them. The proposal gives more options for a local fleet. (ANON-8J71-3NVY-T)
>
> Aircraft with an MTOW under 760Kg, are generally factory manufactured/Certified and maintained by a LAME. A 760Kg MTOW aircraft has increased stability and superior control authority. There is no information within the DP on accident rates on A/C below 600Kg vs 760Kg MTOW. (ANON-8J71-3NVF-7)
>
> As a heavier built pilot, as many of us are it will open up more available aircraft to us since some types I believe operate at reduced mtow. (ANON-8J71-3NVC-4)

B.5 Does the proposal affect you as an individual positively or negatively?

In response to whether the proposal affects individuals positively or negatively; 261 (64%) answered positively, 52 (13%) answered negatively and 95 either did not answer or selected ‘I Don’t Know’.

The following are examples of comments from respondents:

> Increased interest in hiring and flying a wider range of a/c- i.e, more a/c in the air. (ANON-8J71-3N9K-F)
>
> It allows greater choice of aircraft and aircraft capacity to pilots. Currently, the aircraft I fly allows for a larger MTOW than 600kg so this change would grant further freedom as a pilot. (ANON-8J71-3NZ5-T)
>
> The maintenance industry we represent will be put under further economic pressures to survive. (ANON-8J71-3NWS-N)
>
> Overall the proposal offers me very little other than to complicate the process of selling my existing aircraft and purchasing a new one. (ANON-8J71-3NWH-A)
>
> In future I may wish to join a self-administering organisation but for now I am able to meet my needs with a full Private Pilot Licence. (ANON-8J71-3NPH-3)

B.6 Does the proposal affect your aviation business positively or negatively (if applicable)?

In response to whether the proposal affects aviation businesses positively or negatively; 55 (14%) answered positively, 16 (4%) answered negatively and 337 either did not answer or selected ‘I Don’t Know’ due to applicability.

The following are examples of comments from respondents:

> As A flight school instructor it means more choice in what aircraft can be flown. (ANON-8J71-3NT9-R)
>
> We will be able to immediately operate our aircraft to the higher MTOW, improving our fuel margins and allowing us to carry a higher level of basic safety equipment on every flight. We will also be able to encourage our clients to fit safety systems such as

parachutes, satellite tracking and ADSB as the additional weight of these systems will no longer reduce their payload to below their minimum desired amount. (ANON-8J71-3N35-K)

With less flying G.A. flying schools available, (only 1 full time flying school in the state of Tasmania) it gives Pilots that train for a Recreational certificate more choice of aircraft, & more schools available for flight reviews. (ANON-8J71-3N9F-A)

This will add another level of administrative and financial burden to my Certifiation requirements to maintain the customers that I have at present and may have in the future both directly and thru an AMO. (ANON-8J71-3N8C-6)

B.7 Key Themes

Figure 10 shows the number of responses that referred to key themes that arose from respondent comments.

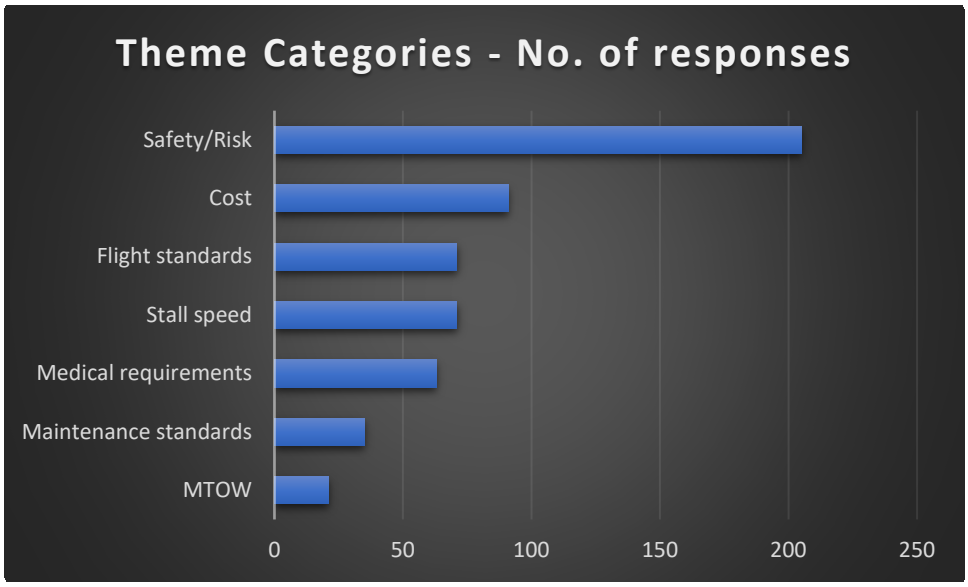

Figure 10 - Type of theme across total submissions to consultation hub

B.8 Safety/Risks

Safety was the most common theme named throughout the responses with 205 (50%) of responses addressing safety and/or risks associated with implementing the policy change.

The following are examples of comments from respondents:

Sadly, negatively outweighs positively when I consider the safety of other operators/pilots. Personally I would benefit in some ways, as having a senior RA-Aus instructor's rating I could use the Cessna150 and Piper Tomahawk I own, if re-registered RA-Aus, to conduct flying training. However, once they're RA-Aus registered, these two aircraft would be limited to VFR Day flight only, so they would no longer have the ability to be flown Night VFR or IFR. (ANON-8J71-3NSX-P)

Increased weight will allow greater safety features to be incorporated in the design and increase in fuel load will allow safer diversions. (ANON-8J71-3NC3-1)

Increase weight will increase safety. (ANON-8J71-3NCQ-Y)

> The positive outcome of this proposed change will largely be dependent on the ASAO being able to manage its responsibilities under the part 149 regime. The risk I see is that the organisation focuses on “tick the box” compliance with part 149 audits and does not monitor widely what is happening in the field. I have been involved with various aspects of sport aviation for many years and the proposed introduction of part149 which was originally floated with ASAC some 30 years ago and is aligned with ISO 9000 Quality Management principles - in recent times we have seen what has happened in the building industry in particular under self reporting quality compliance - buildings constructed that are now deemed dangerous etc. etc. but all the quality compliance boxes were ticked!!!". (ANON-8J71-3N4J-9)
>
> There would’ve a significant number of owners and or operators who pilot aircraft in the max weight of six hundred seven sixty range that would be safer to continue flying the aircraft they are used to than having to change to unfamiliar aircraft. (ANON-8J71-3N42-H)

B.9 Cost to Industry

The cost impact of introducing the MTOW increase was referenced by 91 respondents (22%).

The following are examples of comments from respondents:

> There is no evidence to support a claim that the proposed change would benefit private recreational aviation as it would result in increased costs for owners. (ANON-8J71-3NWZ-V)
>
> This regulatory shambles will further wreck the low end of private GA. GA itself is a plae shadow of what it used to be due to CASA over regulation without regard to cost/ safety benefits. (ANON-8J71-3NWR-M)
>
> Definitely a positive effect on aviation safety and costs. I feel more aircraft and pilots would remain operational and current, if the weight limits were to increase. (ANON-8J71-3NTN-D)
>
> The cost of aviation is increasing significantly to the point where unless you go with a CASA approved school where you can HECS the fees you have to bear the cost of lessons from your own pocket. If this move drives down the cost of lessons and the overall cost of obtaining a licence then it is a good outcome. (ANON-8J71-3NK7-D)

B.10 Variation of Stall Speed

A total of 71 (17%) responses referred to the 45 kt stall speed limitation as a key theme.

The following are examples of comments from respondents:

> My aircraft is Lancair 0200 with only 100 horse power engine yet it would not be eligible if their is a restricted stall speed of just 45 knots. (ANON-8J71-3NJ4-9)
>
> The stall speed question is the main point of concern. (ANON-8J71-3NPG-2)
>
> The proposed retaining of existing stall speeds is potentially a significant hinderance to accepting an increase in the weight for recreational aircaft. In general terms, as the MTOW goes up so does the stall speed. Keeping the stall speed below 45 knots is unrealistic and should be allowed to have a modest increase to around 55 knots, in the landing configuration. The normal landing speeds of aircraft are generally 15 knots above this figure, so the risk is in reality no greater than what exists today in recreational aircraft. In fact these aircraft are easier to fly and land than low power, low

> inertia, high drag types that are currently flown by RA pilots in the sub 600 kg range. (ANON-8J71-3NDE-M)
>
> I agree with Option 2 with an increased stall speed to cater for aircraft that fit into the new weight category, but have a higher stall speed. (ANON-8J71-3NZD-9)
>
> Increase the stall speed restriction. Placing a arbitrary number on the stall speed will limit the usefulness of increasing the MTOW of aircraft design. The current proposal seems like saying, "we will let you go and run but you will have a ball and chain tied to your leg." (ANON-8J71-3N11-D)
>
> The major safety benefit would be exposure to aircraft with significantly different capabilities. However, if restrictions on stall speed, spins etc continue then there will be very little point of difference. (ANON-8J71-3NAN-T)

B.11 Flight Standards

The flight standards theme, for pilot or instructor, was referenced by 71 (17%) of the 408 respondents.

The following are examples of comments from respondents:

> I suggest the introduction of the heavier aircraft should be accompanied with better training and understanding of weight & balance, stall principles, recognition and recovery rather than having a fixed idea ie it won't stall above 45kts! The larger aircraft may unwittingly allow loading that will go outside the envelope! (ANON-8J71-3N4J-9)
>
> The standards that should be addressed, but not necessarily limited to, include: a) Pilot licencing, training and related competency standards, b) Flight instructor training and related competency standards, c) Medical certification of pilots, d) Aircraft maintenance. (ANON-8J71-3NPB-W)
>
> While the proposal to increase MTOW aims to maintain other things the same (continuing airworthiness, medical requirements, access to controlled airspace, single propeller and engine, operational authorisations etc.), the clearly important omission concerns regulations for further pilot training before flying more capable aircraft. (ANON-8J71-3NJF-U)
>
> I don't think there is any appreciable risk with RA pilots flying the proposed class of GA aircraft. The reality is that many modern RA aircraft have a high performance envelop and there is not a big gap between flying for example a Jabiru 230 and a Cessna 150. Therefore, transitional training to the higher MTOW would not need to be complex or time consuming. While weight and balance should not be an issue on 2 seat aircraft it would be prudent to require type conversion training to include instruction around load and GC. I don't see a need for a formal course with exams for conversion training and it could be done the same way it is now with instructor training and competency assessment. (ANON-8J71-3NTT-K)

B.12 Medical Requirements

References to the self-administration system of pilot medical self-certification was addressed by 63 respondents (15%).

The following are examples of comments from respondents:

> With a restricted medical I will be able once again to fly my VH aircraft. (ANON-Z7UJ-QX8A-J)

I own a VH aircraft with a 660 kg MTOW that would be eligible to be registered within an ASAO organisation giving me flexibility. I have an RAAus pilot certificate and find the medical requirements more in line with my type of flying i.e. recreational. (ANON-8J71-3NTS-J)

It will increase the inequality of the medical requirements for the two communities of pilots. How is it safe for an RAA pilot to fly the same aircraft as a CASA licenced pilot with a lower medical standard? Go ahead with this change, and at the same time remove the medical requirements for all recreational pilots. (ANON-8J71-3NVU-P)

Yes by freeing up the Medical Requirements across the entire LIGHT SPORT & GA it will be a very positive move. (ANON-8J71-3NJ9-E)

There are established methods for up skilling to fly heavier aircraft without this mtow increase. The inequity here is the medical requirement why not have a simpler medical regime that is available to all pilots (licensed or certified) for a category of aircraft up to 750 kg mtow. This should not be the exclusive domain of RAA. (ANON-8J71-3NPT-F)

B.13 Maintenance Standards

This theme was referenced by 35 (9%) of the respondents.

The following are examples of comments from respondents:

it has been my experience as a RAAus Level 2 & 4 certifier and LAME that persons operating and seeking maintenance on aircraft involved in an ASAO are less likely to be aware of the required regulatory requirements of CASA and the ASAO. This results in maintenance not being carried out and operational parameters and requirements being overlooked or ignored more than those operating directly under CASA with VH-registered aircraft. I do not see that this change will enhance safety by way of operational or maintenance improvements when the current regulatory frame work is in place to ensure compliant safe air navigation. It has been my experience that the aviation sector that this is being proposed for by its opening up, already struggles with large non compliance in the maintenance area and by anecdotal examples told to me the same is true for the operational sector. This proposal has already been refused once in the past, why therefore is it being resubmitted? One may presume that it is being pushed thru again and again until it is accepted by attrition. This is not good regulatory reform. (ANON-8J71-3N8C-6)

not much talk about maintenance, i would think that expanding the existing raaus level 1or2 maintenance approval to cover larger /heavier aircraft would not lead to safety improvements. (ANON-8J71-3NA5-1)

The changes outlined will allow more freedom for pilots and builders of amateur built aircraft in terms of maintenance of aircraft. Seaplanes should be allowed an extra 50Kg maximum weight as happens now. (ANON-8J71-3NPR-D)

More aircraft will be operating more often and maintenance issues will be relieved. (ANON-8J71-3NTX-Q)

Should the proposal be implemented, I would urge the current RAAus maintenance regime to apply to those aircraft utilized for Private operations only. Until you approach MTOW's of 1500Kg or above, the complexity between your typical currently-RAAus 'complex aircraft' such as a Tecnam P92RG or a Sting S3, both retractable with CSU's that can be maintained by an owner, and those aircraft likely to be captured by the increased MTOW such as a PA38 pr PA22 is not that great. That is to say, if you have a P92RG in your hangar, you can maintain it now under RAAus policy if it is not used

> for training, but a PA38 would require a LAME or RAAus L2 maintenance authority for, what is essentially, a substantially less complex aircraft. I do not believe such a difference is warranted for aircraft that are not utilized for training hire or reward and would urge such a requirement not be implemented for aircraft solely used in Private operations. (ANON-8J71-3NCU-3)

B.14 Maximum Take Off Weight

Comments about the MTOW limit were referenced by 21 (5%) of the respondents.

The following are examples of comments from respondents:

> The MTOW needs to be increased to 1500kg. Already there is aircraft that are listed in the proposal that are operated and maitained under a ASAO system. These aircraft will then be able to be operated as per the POH. The aircraft up to 750kg will have no safety compromizes by being maintained by the people currently doing this work. Risk mitigation of the aircraft above 750kg can be done by limiting occupants to 2 and having the maintainers demonstrate that they are capable of maintaining them to the standards required. (ANON-8J71-3N46-N)
>
> Continue with option 2 but make the weight increase to 1500kg and a corresponding stall speed increase to accomodate the weight change. (ANON-8J71-3NSR-G)
>
> I operate an aircraft that was built for 750 kg gross and would serve me better. (ANON-8J71-3N9T-R)