Access to Class C and Class D controlled airspace for sport and recreation aircraft – (DP 2314OS)

# Overview

We are seeking your input to help with our ongoing work to achieve safe, efficient and equitable access to controlled airspace and controlled aerodromes.

Your feedback and ideas will assist us to consider the options for increasing sport and recreational opportunities as part of our [General Aviation Workplan](https://www.casa.gov.au/resources-and-education/publications-and-resources/corporate-publications/general-aviation-workplan/increasing-sport-and-recreational-opportunities#Overviewofreformsandtimeframes). The aviation community has told us that sport and recreational aviation’s access to controlled airspace is too restricted.

Through the General Aviation Workplan, we committed to consider the options to increase access to Class C and Class D airspace. This includes identifying the additional controls that may need to be put in place to achieve this safely.

This consultation will inform future policy on access to controlled airspace, and we will seek feedback on it in a subsequent consultation.

**Topics for discussion**

Pilots operating in controlled airspace currently must meet standards in relation to:

* pilot competencies
* radio competencies and English language proficiency
* medical fitness
* aircraft equipment
* priorities for airspace access

These aim to ensure pilots can operate in controlled airspace safely.

Discussion Paper (DP) 2314OS examines the various requirements for users of controlled airspace and controlled aerodromes in Australia and the objectives underpinning the requirements.

We would like to know if you think:

* the objectives are appropriate and reasonable
* the current requirements reflect the objectives
* if there are alternative ways we could achieve the objectives.

To learn more before you provide a response, please read DP 2314OS.

**Class 5 medical self-declaration policy**
We are also seeking feedback on a proposal for a [Class 5 medical self-declaration policy](https://consultation.casa.gov.au/regulatory-program/pp-2302fs-2/%22%20%5Ct%20%22_blank). The proposal considers access to controlled and non-controlled airspace.

# Why your views matter

Your feedback will help us to understand the effectiveness of the current requirements before we explore alternatives or options for improvement.

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:

* Discussion Paper 2314OS
* 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 next steps.

All comments received on the discussion paper will be considered to inform future policy on access to controlled airspace.

# 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

* Discussion Paper 2314OS
* MS Word copy of online consultation - Access to Class C and Class D controlled airspace for sport and recreation aircraft – (DP 2314OS)

Audience & Interest groups

**Audience**

|  |
| --- |
| * Air operator
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| * Flight instructors and flight examiners
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| * Flight training operators
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| * Pilots
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| * Sports aviation operators
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| * Hot air balloon operators
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| * Air traffic controller/s
 |
| * Drone operators
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| * Amateur/kit-built aircraft owners and builders
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| * Self-administering aviation organisations
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| * Parachute operators
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| * Parachuting sport aviation bodies
 |
| * Pilots of parachuting aircraft
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| * Sport and recreational balloon owners and pilots
 |
| * Sport aviation bodies & prospective ASAOs
 |
| * Gliding clubs
 |
| * Aircraft owner/operator
 |
| * Aerial work operator
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| * Part 142 operator
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| * Part 141 operator
 |
| * Air transport operations – rotorcraft (Part 133)
 |
| * Aerial work operator (Part 138)
 |
| * Training organisation representative
 |
| * Flight training organisations
 |
| * Air traffic service provider/s
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**Interest**

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| * Airspace and infrastructure
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# Page1. Consultation Content

This consultation asks for your feedback on the discussion paper relating to the requirements for accessing controlled airspace *-* (DP 2314OS).

The survey has been designed to give you the option to provide feedback on the survey in its entirety or to provide feedback on the policy topics applicable to you.

When you have completed the sections on which you wish to provide feedback, select the **‘Finish’** button at the bottom right of this page.

|  |  |
| --- | --- |
| Page | Content |
| 1 | Table of contents |
| 2 | Personal information (required) |
| 3 | Consent to publish submission (required) |
| 4 | Discussion – Pilot competencies |
| 5 | Discussion – Radio competencies and English language proficiency |
| 6 | Discussion – Medical fitness |
| 7 | Discussion – Aircraft equipment |
| 8 | Discussion – Priorities for airspace access |
| 9 | General comments |

# 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.*

[ ]  Pilot - Part 61

[ ]  Pilot - Sport and recreational

[ ]  Air operator

[ ]  Sport aviation body

[ ]  Air traffic service provider

[ ]  Flight training operator

[ ]  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)<https://www.casa.gov.au/rules/changing-rules/consultation-industry-and-public>.

# Page 4. Discussion – Pilot competencies

Pilots who operate in Australian airspace need specific competencies to preserve individual and aviation system safety and to ensure operations are conducted efficiently. The objectives of these established competencies are to ensure pilots:

* have navigational proficiency (including flight planning, an awareness of navigational tolerances and proficiency in navigating in all dimensions [lateral, longitudinal, vertical and time]) and the ability to understand and comply accurately with Air traffic Control (ATC) instructions on assigned routes and altitudes to avoid conflicting with other aircraft
* can implement emergency procedures and communicate with ATC
* understand and have awareness of weather conditions and the ability to plan the flight to avoid entering controlled airspace without appropriate clearance
* are aware that entry to controlled airspace is subject to receiving clearance from ATC—the height, direction and speed of an aircraft is at the direction of ATC
* have knowledge of AIP, including DAH, ERSA and NOTAM, and the ability to understand those resources and apply them to the operation
* can identify and notify when compliance with ATC instructions cannot be met
* can communicate with ATC and other airspace users using aviation-specific phraseology
* are adequately prepared to manage traffic diversity, density, and complexity in a dynamic and changing environment.

These competencies are critical for operations in controlled airspace where multiple aircraft can operate in close proximity. They have been developed to reduce the risk of mid-air collisions, prevent accidents and incidents, ensure the efficient use of airspace resources, and maintain the high operational standards required in controlled airspace environments.

**Please see the fact banks below for more information on how the current requirements apply.**

Fact bank - Part 61 pilots

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| A pilot licensed under Part 61 of the *Civil Aviation Safety Regulations 1988* *(CASR)* must demonstrate competence before operating in controlled airspace. This is done by demonstrating competency in the standards set out in units ‘CTR – Operate at a controlled aerodrome’ and unit ‘CTA – Operate in controlled airspace’, in the Part 61 Manual of Standards. The recreational pilot licence (RPL) does not automatically include operating in controlled airspace as a privilege of the licence. RPL holders can gain the controlled aerodrome endorsement and controlled airspace endorsement by completing units CTR and CTA, which allows the pilot to operate in controlled airspace and at controlled aerodromes. All other licences also require the holder to have demonstrated competence in units CTR and CTA.The Part 61 training pathway emphasises the importance of planning and applying a structured approach to operating in controlled environments. The behaviours and competencies expected of pilots operating in controlled environments build on the piloting competencies and responsibilities expected of recreational pilots. Operating in controlled environments is more structured and formal, with a strong emphasis on safety awareness and the willingness to self-report errors or when unable to comply with ATC instructions. The training provided through the Part 61 pathway ensures that pilots meet these competency outcomes. |

Fact bank - Sport and recreational pilots

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| Sport and recreational pilots currently operating aircraft under certain Civil Aviation Orders (CAOs) need to meet the same competency standards as a Part 61 licence holder prior to operating in controlled airspace. Most sport and recreation pilots are required to hold a current Part 61 licence which permits operations in controlled airspace and at controlled aerodromes.There are limited exceptions to the requirement to hold a Part 61 licence. For example, pilots flying sailplanes under the administration of the Gliding Federation of Australia (GFA) can enter and exit the Class D airspace surrounding Camden aerodrome under a letter of agreement with Airservices Australia and pilots of hang gliders and paragliders may be flown in Class C or D airspace that is below 300 feet above ground level and not within 10 nautical miles of a controlled aerodrome. In addition, some Recreational Aviation Australia (RAAus) solo training flights and private hire flights may be conducted in Class D airspace without the pilot holding a Part 61 licence under [CASA EX55/22 — Flight of Certain Ultralight Aeroplanes in Class D Airspace (Approved Flight Training Schools) Instrument 2022](https://www.legislation.gov.au/Details/F2022L01011), or in Class C airspace under [CASA EX162/21 Flight of Relevant CAO 95.55 Aeroplanes in Class C Airspace at Canberra Aerodrome (Learn 2 Fly Canberra)](https://www.casa.gov.au/flight-relevant-cao-9555-aeroplanes-class-c-airspace-canberra-aerodrome-learn-2-fly-canberra), so long as certain competency requirements in units CTR and CTA of the Part 61 MOS are met. |

**Question 1.** Are the overall competencies for pilots to operate in controlled airspace and at controlled aerodromes appropriate and reasonable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Do the competency standards for CTR - Operate at a controlled aerodrome and CTA - Operate in controlled airspace (in the Part 61 Manual of Standards) reflect the objectives?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 3** Do you have any suggestions or alternative methods, in relation to overall pilot competencies, for achieving the objective of safe operations in controlled airspace and at controlled aerodromes?

Radio buttons

[ ]  Yes (please include your suggestions below)

[ ]  No

Comment

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# Page 5. Discussion – Radio competencies and English language proficiency

Pilots who operate in controlled airspace must be competent in operating radio equipment under both normal and emergency conditions. Correspondingly, pilots need to be able to communicate clearly and competently in English, including using aviation terminology and phraseology. These competencies ensure pilots:

* can communicate effectively with Air Traffic Control (ATC) using proper terminology and phraseology, clear and concise messages, and receive and comply with ATC clearances and instructions promptly and accurately. This allows ATC to coordinate and manage traffic and separation, reduces the risk of misunderstanding or conflicts, and reduces the risk of frequency congestion
* can communicate effectively with other airspace users to communicate their intentions, requests, and position reports. This minimises the risk of incidents or accidents and promotes orderly traffic flows
* are aware of other aircraft in their vicinity through “alerted see-and-avoid”, leading to greater situational awareness and improved safety
* are competent to operate all equipment fitted to the aircraft. This ensures that pilots can understand and comply with ATC instructions such as changing the transponder code to facilitate ATC surveillance.

All pilots – irrespective of licence type – are required to continuously monitor communications while in controlled airspace and comply with requirements for ATC clearances and readbacks while operating in any controlled airspace or at a controlled aerodrome.

**Please see the fact banks below for more information on how the current requirements apply.**

Fact bank - Part 61 pilots

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| A pilot licensed under Part 61 of CASR must demonstrate competency in operating radio equipment and being able to communicate clearly and competently in English. This is done by demonstrating competency in the standards set out in units ‘RARO RPL aeronautical radio operator’, ‘C1 Communicating in the aviation environment’, ‘C3 Operate aeronautical radio’ and ‘RNE Radio navigation – enroute’ of the Part 61 MOS.Unit ‘GEL General English language proficiency’ of the Part 61 MOS sets out the general English language proficiency standard that applies to student pilots and recreational pilot licence (RPL) holders. The GEL standard is set by government as the minimum English language standard for people undertaking study or learning. Unit ‘AEL Aviation English language proficiency’ describes the minimum aviation English language proficiency required for all other flight crew licences and for obtaining recreational pilot licence endorsements.RPL holders can gain the flight radio endorsement by completing units RARO, C1 and C3 in the Part 61 MOS. Applicants for the flight radio endorsement need to meet the AEL standard. This endorsement allows the pilot to transmit on an aviation safety radio frequency.All other licences also require the holder to have demonstrated competency in units C1, C3 and RNE in the Part 61 MOS prior to the grant of the licence. The outcome of this is that pilots licensed under Part 61 of CASR are required to have been trained and deemed competent in operating aircraft radio equipment and communicating in English before they can operate in controlled airspace environments. |

Fact bank - Sport and recreational pilots

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| Sport and recreational aircraft operating in controlled airspace need to carry radiocommunications equipment capable of two-way communication with ATC, and the pilot needs to be authorised to operate the radio equipment. If transmitting on a VHF frequency, the pilot must be authorised under Part 61 of CASR or a relevant sport aviation body.If transmitting on an aeronautical HF frequency, the pilot must be authorised to transmit using an aeronautical radio under Part 61 or Part 64 of CASR.The competency standards to be authorised to transmit using radio equipment under a sport aviation body are intended to align with those in the Part 61 MOS. Meeting these competencies is an important factor to promote consistency and ensure pilots operating in controlled airspace can do so safely. |

**Question 1.** Are the overall competencies for radio and English language competency standards appropriate and reasonable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Do the competency standards for operating radio equipment (in the Part 61 Manual of Standards) reflect the objectives?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 3.** Do the competency standards for ‘AEL – Aviation English language proficiency’ (in the Part 61 Manual of Standards) reflect the objectives?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 4.** Do you have any suggestions or alternative methods, in relation to radio competencies, for achieving the objective of safe operations in controlled airspace and at controlled aerodromes?

Radio buttons

[ ]  Yes (please include your suggestions below)

[ ]  No

Comment

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# Page 6. Discussion – Medical fitness

Medical standards are a precursor to exercising the privileges of a pilot licence and are put in place to control the risk of incidents or accidents caused by pilots experiencing in-flight impairment, incapacitation, or other medical-induced issue, which may impact on aviation safety. Air traffic control (ATC) would be obliged to manage this risk, potentially by diverting all other aircraft around an aircraft which appears to be experiencing a medical-induced incapacitation, impairment or issue. However, the consequence of a medical incident in Class C and Class D controlled airspace is heightened due to the potentially higher volume and types of traffic (such as larger passenger-carrying aircraft) and the pragmatic ability of ATC to manage this risk.

CASA has also released a related policy proposal on the proposed [Class 5 medical self-declaration scheme](https://consultation.casa.gov.au/regulatory-program/pp-2302fs) for public consultation. The proposed new Class 5 medical self-declaration aims to provide pilots conducting private operations with a more streamlined and efficient medical self-certification pathway that is self-assessed and self-declared within a risk-based and quality and assurance governance framework aimed at assuring aviation safety.

**Please see the fact banks below for more information on how the current requirements apply.**

Fact bank - Part 61 pilots

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| Recreational pilot licence (RPL) holders under Part 61 of the *Civil Aviation Safety Regulations 1988 (CASR)* can exercise the privileges of the licence if they hold either a current class 1 or 2 medical certificate, hold a current recreational aviation medical practitioner’s certificate, or hold a medical exemption for the exercise of the privileges of the licence.Private pilot licence holders can exercise the privileges of the licence if they hold either a current class 1 or 2 medical certificate, a current recreational aviation medical practitioner’s certificate, or a medical exemption for the exercise of the privileges of the licence. If using a current recreational aviation medical practitioner’s certificate, a pilot can only conduct a flight by day under the Visual Flight Rules. Private pilot licence holders can exercise the privileges of the licence in certain circumstances and subject to conditions if the pilot holds a current Aviation Medical Certificate (Basic Class 2).The holder of a commercial pilot licence, multi‑crew pilot licence or air transport pilot licence can exercise the privileges of the licence only if the holder also holds a current class 1 medical certificate or a medical exemption for the exercise of the privileges of the licence.The impact is that pilots licensed under Part 61 of CASR need to meet an increasingly higher medical standard if they wish to conduct activities with increasingly higher safety consequences (such as aerobatics, low-level flight, flight instruction, operations above 10 000 feet or operations with multiple passengers). |

Fact bank - Sport and recreational pilots

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| Some sport and recreational pilots are limited to operating outside controlled airspace as they operate under a self-declared driver's licence medical standard. Currently, sport and recreational pilots who wish to operate in Class C or D airspace or a military restricted area effectively need to meet the same medical standards as pilots licensed under Part 61 of CASR. This is because these pilots generally need to hold a pilot licence with an aircraft category rating that permits the pilot to operate in controlled airspace and at a controlled aerodrome and have a valid flight review for the aircraft class rating in accordance with Part 61 of CASR. According to those standards, the privileges of a pilot licence are not able to be exercised unless the pilot has the pre-requisite current medical certificate.Changes settled consequent to CASA's proposals for the Class 5 medical self-declaration scheme currently in consultation may impact extant arrangements.  |

**Question 1.** Are the objectives for medical fitness appropriate and reasonable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Do the current requirements reflect the objectives?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 3.** Do you have any suggestions or alternative methods for achieving the objectives?

Radio buttons

[ ]  Yes (please include your suggestions below)

[ ]  No

Comment

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# Page 7. Discussion – Aircraft equipment

Aircraft operating in controlled airspace or at controlled aerodromes are required to carry equipment such as radiocommunication and surveillance equipment. This ensures that pilots are contactable and can engage with Air Traffic Control (ATC) and other airspace users, and that the aircraft can be surveilled or detected (where applicable). The intended objectives are to ensure:

* pilots can readily receive and understand instructions and clearances from ATC, and provide required reports and readbacks to ATC
* pilots can communicate with each other when necessary to enhance situational awareness and coordinate to avoid conflicts
* visibility to ATC of aircraft operating in controlled airspace, particularly in situations of high traffic density or complex operations. This helps ATC track and separate aircraft and manage the airspace efficiently
* an aircraft and equipment fitted to an aircraft meets serviceability and reliability requirements needed to operate in controlled airspace. For example, the ability for an aircraft to maintain height and track, and for an altimeter to operate within tolerances help ensure safety while operating in controlled airspace.

While there are different equipment certification requirements between type-certified and light sport/experimental aircraft, the carriage and performance requirements for aircraft equipment are generally the same for aircraft with a VH registration or aircraft administered by an approved self-administering organisation.

**Please see the fact banks below for more information on how the current requirements apply.**

Fact bank – VH-registered aircraft

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| Generally, aircraft with a VH registration that are being operated in controlled airspace and over populous areas need to be fitted with radiocommunication and surveillance equipment that meets known certification requirements. For example, section 26.18 of the Part 91 Manual of Standards requires most aircraft to be fitted with radiocommunication systems which meet specified requirements. In addition, aircraft operated in controlled airspace generally need to have a prescribed form of surveillance equipment on board, either an approved ADS-B OUT equipment configuration, approved transponder or approved integrated TABS device. |

Fact bank - Sport and recreational aircraft

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| Sport and recreational aircraft operating in controlled airspace need to carry radiocommunications equipment capable of two-way communication with ATC, and the pilot needs to be authorised to operate the radio equipment. If transmitting on a VHF frequency, the pilot must be authorised under Part 61 or a relevant sport aviation body to transmit on a VHF frequency.In addition, sport and recreational aircraft operating in some controlled airspace may need to be equipped with a transponder. The equipment requirements set out in the relevant CAOs apply similar equipment requirements to those specified in the Part 91 Manual of Standards for aircraft conducting operations other than air transport operations in VH-registered aircraft. |

**Question 1**. Are the objectives for requiring aircraft to be fitted with nominated equipment suitable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Are the current requirements suitable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 3.** Do you have any suggestions or alternative methods for achieving the objectives?

Radio buttons

[ ]  Yes (please include your suggestions below)

[ ]  No

Comment

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# Page 8. Discussion – Priorities for airspace access

One of the considerations in classifying controlled airspace, including Class C and Class D airspace, is that of equitable access. As there will be a variety of users within any single class of controlled airspace, the designation of controlled airspace is intended to equitably meet the needs of all potential users, not just a few. Consequently, in the operational context, the relative equity of users must be assessed on a real time basis, priorities determined, and flights accommodated by Air Traffic Control (ATC) accordingly.

From a strategic perspective, priorities have been promulgated at the general and specific level in the Aeronautical information Publication. At the tactical level, the principal consideration is that of ATC workload. This is largely a manifestation of the first of the 3 specifications nominated by ICAO for controlled airspace - ensuring separation between aircraft to avoid collisions.

**Question 1.** Are the objectives for Class C and Class D access priorities suitable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 2.** Are the current requirements suitable?

Radio buttons

[ ]  Yes

[ ]  Yes, with changes

[ ]  No (please set out your reasoning and alternative suggestions below)

[ ]  Undecided / Not my area of expertise

Comment

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**Question 3.** Do you have any suggestions or alternative methods for achieving the objectives?

Radio buttons

[ ]  Yes (please include your suggestions below)

[ ]  No

Comment

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# Page 9. General comments

Do you have any additional comments about the issues raised in the discussion paper?

For example, in what way (if any) have you or your organisation been **impacted** by the current requirements for operating in Australian controlled airspace or controlled aerodromes?

Comments

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