

Brad Parker
a/Branch Manager
Civil Aviation Safety Authority
GPO Box 2005
Canberra ACT 2601

13 January 2021

Broome and Karratha Airspace Review

Dear Mr Parker,

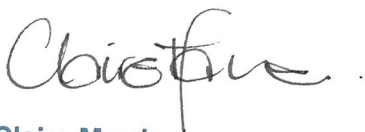
Thank you for the opportunity to comment on the draft Broome and Karratha Airspace Review and I apologise for the delay in responding.

Airservices does not support Recommendations 1 and 2 in relation to airspace change, and would like to make the following broad observations on the review:

- There is no objective data showing increasing passenger numbers and air transport movements at both Karratha and Broome.
- Aviation incident data does not reflect an increasing risk with the airspace surrounding Broome or Karratha.
- The collision risk modelling in the draft review does not appear to have had appropriate regard to equipage of Automatic Dependent Surveillance – Broadcast (ADS-B). Broome and Karratha airspace is managed by aerodrome controllers using Tower Situational Awareness Display and enroute controllers manage control area (CTA) using ADS-B surveillance from cooperating ADS-B equipped aircraft. Equipped Visual Flight Rules (VFR) aircraft in Class E airspace present no different a risk to any VFR aircraft in Class D airspace
- The report appears to give substantial weight to stakeholder feedback without supporting analysis.
- The review appears to make assumptions on pilot behaviour that are not consistent with the requirement of VFR operators entering Class E airspace.

We will consider recommendations 3 and 4 which relate to SIDs and STARs once the final airspace design has been established and approved by CASA.

Kind Regards,

A handwritten signature in black ink that reads "Claire Marrison".

Claire Marrison
Chief Safety & Risk Officer