

Submission 131 – Confidential

Dear Sir/Madam,

I am writing to express my strong opposition to the proposed imposition of remote identification (Remote ID) regulations on hobbyist quadcopters and model aircraft. As an avid enthusiast of this recreational activity, I believe that such a requirement is unnecessary and would place an undue burden on law-abiding hobbyists without significant safety benefits.

Firstly, it is important to acknowledge the commendable safety record of hobbyist quadcopters and model aircraft. The vast majority of hobbyists adhere to established guidelines and operate their unmanned aircraft responsibly. They understand the importance of safety precautions, respect airspace regulations, and prioritise the well-being of others. This responsible behaviour is evidenced by the limited number of incidents involving hobbyist-operated drones and model aircraft.

It is worth noting that the existing regulations governing hobbyist quadcopters and model aircraft are sufficient in maintaining safety standards. The Civil Aviation Safety Authority's (CASA) current guidelines provide clear directives on where and how these devices can be flown safely. Hobbyists are required to operate their aircraft below certain altitudes, away from airports and populated areas, and within visual line of sight. These regulations, when followed diligently, ensure that the risk to public safety remains low.

The proposed implementation of Remote ID for hobbyist quadcopters and model aircraft seems to be based on concerns related to unauthorised flights and nefarious activities. However, it is essential to recognise that the vast majority of hobbyists have no intention of engaging in unlawful or malicious behaviour. Punishing law-abiding enthusiasts by imposing additional regulatory requirements is disproportionate and does not effectively address the root causes of any potential safety concerns.

Moreover, the proposed Remote ID requirement raises privacy concerns for hobbyist operators. Requiring real-time tracking and identification of model aircraft compromises the privacy of individuals engaging in a lawful recreational activity. Making their location available to the public creates an unacceptable risk to the operator and should not be considered. Given that these aircraft are operated in public airspace and are typically small-scale devices with limited capabilities, the need for such invasive measures is questionable.

Given the large gaps in mobile internet coverage within Australia at present, Network remote ID would not be practical at this time. The cost of providing mobile internet connections to hobbyist aircraft would also be prohibitive.

The American remote ID system is vulnerable to spoofing since they do not use digital certificates to prove that the remote ID data being broadcast is genuine.

Model aircraft clubs often do not welcome quadcopters at their flying fields, so establishing FRIAS there will be of little use to most quadcopter enthusiasts.

If you insist on implementing Remote ID, it should not be required on sub 250 gram or preferably sub 1 kilogram quadcopters due to the lack of space to fit an RID module and the hit to performance from the additional mass.

Instead of imposing Remote ID, I believe that a more effective approach would be to focus on education and awareness campaigns that emphasise the importance of responsible drone and model aircraft operation. Encouraging hobbyists to obtain the necessary knowledge and certifications, promoting safe flying practices, and increasing public awareness about airspace regulations can go a long way in maintaining a culture of safety within the hobbyist community.

You should also consider the benefits to both aviation and society at large, arising from encouraging participation in the remote control hobby rather than instigating what appears as an attempt to stamp it out. Building model aircraft is an excellent way of engaging young people with STEM subjects and many people not least, Neil Armstrong found their way into aviation through it.

In conclusion, I strongly urge the Australian Civil Aviation Safety Authority to reconsider the imposition of Remote ID regulations on hobbyist quadcopters and model aircraft. The existing safety record, along with the adherence to established guidelines by responsible hobbyists, indicates that additional regulatory burdens are unwarranted. Instead, let us focus on education and awareness initiatives that foster responsible operation while preserving the privacy rights of hobbyists.

Thank you for considering my views on this matter. I trust that you will carefully evaluate the potential impact of these regulations on the hobbyist community, ensuring a balanced approach that maintains safety without unduly restricting the enjoyment and creativity of enthusiasts.

Kind Regards

