Submission 56 – David Cooper

Please find attached, a letter containing the reasons I believe Remote ID, while being of some help with Commercial drone operation and store bought GPS assisted camera drones, will prove over time, to be harmful to our aviation industry in Australia..

Comment regarding introduction of Remote ID in Australia 30/6/2023

David Cooper
[redacted]

Speaking as an experienced recreational Radio Control and full-size pilot, I propose Remote ID to be implemented ONLY on commercial drones and preferably with network connectivity (NRID) in the case of delivery and Air Taxi drones. Commercially bought recreational UAVs with GPS assistance (eg DJI, Autel Skydio etc) should have a mandatory integrated Broadcast Remote ID. However, I would like to draw your attention to the fact that radio controlled helicopters, race quads, model fixed wing aircraft, have a perfect proven safety record (as do all drones - Zero deaths worldwide) and should be exempt completely from remote ID on the basis of using a CASA supplied phone application which both provides zoning, safety and Commercial route information to the pilot and simultaneously can record the chosen flight location and other details on a network database voluntarily by the pilot.

Recreational RC flights (non-camera drone) are short in nature, are for the purpose of enjoyment and improving flying skills, are not possible unless flown line of sight and close to the operator, normally well below 100 ft and conducted either in sheltered operation (under tree line) or in safe open areas away from other drones or manned aircraft. RC operators are pilots who are passionate about flight and fastidiously keep rules of safety. While ideally, our aircraft are best flown at a recognized flying field, many cannot afford the high cost of yearly fees and often considerable travel to a field. Please consider a young person wishing to become a pilot. Costly Remote ID modules, or the need to travel and pay to be a member at a flying field will greatly hinder young people's interest in the hobby. Many RC pilots, like me usually started out learning to fly at home in the backyard, a local sports field (when not in use) or in a remote location. They can eventually go on to become members of RC flying clubs (but not always), attain pilot licences for manned aircraft and commercial drone licences. I cannot over emphasize the importance of encouraging our young into the hobby. Needless over regulation will discourage them.

Remote ID in the United States has already created major dissatisfaction in the recreational RC community with many stating they will either not comply or are

leaving the hobby. It is not sensible or fair to penalize those who genuinely contribute to the world of aviation and are keen to do it safely without being prompted.

Compulsory Remote ID poses a risk to the radio control pilot if the public are given their location and other details. Those of ill intent possibly harming the pilot or stealing their belongings. Consider the extra risk to a young person flying a model aircraft for example.

Remote ID modules have relatively poor range, are expensive and reduce the performance of smaller models.

Remote ID is of no use if UAV is used nefariously as any smart criminal will neither have it registered and/or fitted with RID.

Remote ID is only useful for tracking the use of UAVs flown by law abiding citizens (unless using a commercial integrated type such as DJI).

The average Remote ID module is small, easily hidden and, with little effort, be illegally used to suspend sensitive operations at airports or military bases etc.

Apart from tracking data, there are few benefits to either users or CASA. CASA will have a huge increase in workload.

Australia is a country of wide expanses. Despite the rhetoric saying that huge UAV numbers require a monitoring system, our geography suggests that skies clogged with drones is going to be a highly unlikely situation, apart from densely populated cities (many of which have restricted zones anyway.) This will certainly be the situation for hobbyist RC aircraft. For the sake of the future of aviation, it is vital to draw a distinction between GPS camera drones and non GPS RC aircraft.

To conclude, I believe the aviation industry and community in Australia has more to lose from remote ID than it can gain. It should be mandatory only for GPS guided camera drones over 250 grams and commercial operations over 250 grams or flights in danger/sensitive zones. A CASA smart phone app such as 'Can I fly there?' with a network database where remote pilot can fill in optional details would provide ample flying safety. Extreme regulation such as compulsory RID on non-GPS fixed wing model aircraft, race drones, helicopters and the like, serves only to discourage budding young pilots from entering the aviation industry. Let’s not make the same mistake as the FAA. I implore CASA to keep the existing drone rules that have served us well and introduce RID ONLY where it will make a difference - GPS camera drones, Commercial Interests and flights in danger zones.

Should our leaders decide to make RID compulsory leaving CASA with no choice (as happened in the USA) enforcing RID across every UAV over 250 grams regardless of whether it has GPS and camera or not, I request that the RID information be available ONLY to law enforcement and CASA representatives (e.g., Encrypted)

Thankyou for your time and interest. Kind regards