

## Submission 65 – Clayton Oostergo

5 July 2023

Response to

### EMERGING AVIATION TECHNOLOGIES

# Remote Identification (Remote ID)

Discussion Paper for Public Consultation

To be very clear the implementation of Remote ID on the hobby of Remotely Piloted Aircraft is doomed to fail in a most dismal way. The reason for this is as follows:-

- You will be segregating and targeting a portion of the population under a law, by requiring innocent persons to wear what is intrinsically an Ankle bracelet which will broadcast their location, not only to the Authorities but to any one who may wish to do harm to the wearer or holder of this device. This is in breach of the International Convention on Civil and Political Rights & International Covenant on Economic, Social and Cultural Rights and the Universal Declaration of Human Rights that Australia has signed with the UN. The result of this action will at some time in the near future result in harm coming to a person as a direct result of this requirement/Law. The Australian Parliament & Ministers and the relevant administering Authority will this be directly responsible for creating this situation, and as an extension of this will be liable to be sued for damages, when this event occurs.
- Existing “Drones” or remotely piloted Aircraft manufactured prior to the date of the implementation of Remote ID will not have the capability of allowing the retrofit of the necessary equipment. Particularly many of the fixed Wing and Helicopter models under 3.5 kilograms in weight.
- A single remote ID module or a mobile phone “spoofing” a module’s signal will be able to shut down an Airport anywhere in Australia at any time just by being turned on or seeming ly turned on and broadcasting erroneous information with in the Airports boundary, this will cause massive disruption to Australian air travel and the Australian travelling public. External influences whit hostile intent toward Australia will be handed the most easy way to stop all air travel in every City with out actually leaving their computers.

- As stated in your discussion paper Remote ID will make the Air Space up to 120 meters safer, however further down it acknowledges that Remote ID will do Nothing for Safety!! This in its inception remote ID is useless as a tool and not fit for purpose.
- The cost of the Remote ID is exorbitant and not affordable to many people both in the hobby and entering the hobby. Additionally there is a shortage of computer components to manufacture the Remote ID units, so how will a person be able to comply if the Remote ID Unit is not available? Will the Government be supplying these Units free of charge?
- Where is the underpinning legislation or government policy that allows this LAW to be made? Which Senators/Member of parliament voted for this action to be taken? Their names should be provided so that the public has a chance to speak with these individuals directly and to hold them accountable for the decision to implement such a harmful Law.
- NBN and Telecommunications network in Australia is not up to the task to handle the additional influx of information and bandwidth for either Network or Broadcast Remote ID.
- Who will police this LAW? Both Local & Federal Police are under staffed and stretched to the limit in most jurisdictions, There are no CASA agents that are patrolling, so if there is no one to respond to a problem from a supposed breach of this LAW why create the LAW in the first place.

Successful implementation may be possible if:-

- The implementation is limited to Commercial "Drones" over 3.5 kilograms nett weight & All Commercial "Delivery" Drones of any weight. Commercial "Delivery Drones will also need to be restricted to using the airspace above public Roads. Flight paths over private property and Public Spaces such as local parks and National Parks will need to be prohibited for safety and noise reasons.
- This Law Applies only to Hobby grade "Drones" exceeding 4.5 Kilograms nett weight.
- Does not apply to any existing "Drones" purchased prior to the implementation date.
- Does not apply to Hobby Foam / Foam- Plastic composite fixed wing remotely controlled Airplanes under 4.5 Kilograms nett weight.

- **If the implementation of Remote ID is required for all “Drones” then the Government will need to implement a Buy Back Scheme to allow Persons to exit the hobby,** in a similar vein to the GUN Buy Back schemes that the Government implemented. In essence this Law will deem any “Drone” to be a weapon similar to a GUN, AND any “Drone” User a criminal and thus requiring them to be tracked by the government – so much for freedom in Australia.
- No fees will need to be paid to enable or register the Remote ID module.
- It is made acceptable to transfer the same Single Remote ID module between different models. As you may or may not be aware a single person in the hobby can only fly one remote controlled plane at a time.
- The whole of Australia is classified as a FRIA Class G with restrictions brought in to place Class C & D around airports and controlled / Restricted airspace only, similar to the current system used for defining air space for Commercial and General Aviation nominated as the Australian Airspace Architecture.

My hope is that you consider this response very carefully and in essence not proceed with this REMOTE ID requirement for any hobby remote controlled aircraft “Drone”.

Should you take the courageous step and implement this LAW then you will also need to follow through with a full buy back scheme to allow people to exit the hobby and thus avoid the dangerous situation you will be creating for the persons that remain in the hobby having to broadcast their location while not providing any additional safety in any way to General or Commercial aviation, who in theory should not be any where in or near the 0 Meter to 120 Meter airspace unless they are taking off or landing near an airport, in which case they are in controlled airspace anyway.

I have previously submitted responses to other Government discussion papers and have noticed that you the bureaucrats that coordinate the responses have to date taken no notice of any suggestions that come from individuals. This leaves me to the conclusion that you will implement this LAW regardless, thus all of this discussion is futile.

This proves my point that Australia is no longer a Democracy and that this discussion paper like so many others that the Government produced is just a box you need to tick so that you can prove due diligence in relation to the over arching Government policy that is called Public Consultation.

Kindest of regards

Clayton Oostergo