Submission 100 – Darrell Burkey

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Response To
'Remote ID Discussion Paper for Public Consultation'

Concerns Regarding the Discussion Paper

Assumptions presented by the questions are not supported with references and/or evidence. This has a very negative impact on the usefulness of the survey and limits the ability to provide additional relevant information. I fail to see how the survey in its current form provides for professional examination of the issues being discussed. I would prefer to see more independent evidence and transparency in relation to the consideration of the proposal to implement Remote ID for UAVs in Australia.

An Opportunity for Improvement of Proposed Systems

I do support a system that identifies the location of a drone and provides a registration number that can used to identify the owner/pilot. While Remote ID as implemented by the FAA in the United States does provide this feature, it also has negative aspects that I see no reason for Australian regulators to duplicate. It's very early days for this technology and I see no risk in allowing some time to learn from implementations overseas before proceeding.

We have an opportunity here to have a better system so why limit our options by using techniques that could contain unexpected outcomes? Keep in mind that even in these early days equipment is already available to spoof Remote ID by sending out signals of non-existent UAVs. It's child's play to flood an area with IDs of UAVs which if done at an airport would cause havoc. There's obviously more work to be done with this technology to provide desired outcomes without side effects.

The Hidden Effects of Remote ID

In order for Remote ID to be effective it will be required for flight systems to be modified to ensure the feature is used and can not be disabled. DJI drones already have automatic restrictions in place to prevent pilots from flying in controlled airspace and I believe this approach works well. The system does allow operators to seek exceptions for those certified to fly in restricted areas.

Unfortunately, if Remote ID is mandatory then DIY users and researchers will be severely compromised as they will lose the ability to customize equipment for specific use. This is bound to have a very negative impact on the advancement of aerial robotic systems in Australia. Locking down Remote ID could also have a negative impact on safety as it will limit the ability to apply important firmware updates/improvements.

It is also important to correct statements indicating that Remote ID provides traffic management and/or collision avoidance. As proposed the system will not provide this capability. Remote ID is not a replacement or addition to the current systems in use for traffic management.

We must also consider the issue of privacy in relation to the pilot's location being broadcast. Given that Remote ID provides a link from the UAV to the person responsible for the vehicle then what need is there to identify the location of the pilot? In my use of commercial UAV systems I have members of the public interfere with my work on a regular basis which can impact on safety. This is such an issue that our workflow now incudes that the co-pilot is responsible for preventing individuals from harassing the pilot. In some instances, such as during training in remote locations, a pilot may be flying alone. I'm not sure of how wise it is to publish the location of a person in a remote location with a lot of expensive equipment.

Current Systems Exist

Systems are already in place that can track and identify UAVs. DJI, which makes up a considerable amount of the commercial UAV market, offers equipment to law enforcement and government bodies for this use. Other solutions have been used for years to identify UAVs in flight such as over the Sydney Harbor bridge. It might be a good idea to do a little research on these systems before implementing Remote ID.

Commercial operators are already registered and must log all flights which are subject to audit by authorities. I see no reason for trained certified pilots be tracked in real time as might be useful for hobbyists who are more likely not to be familiar with regulations and safety requirements.

Summary

As a commercial operator of UAV technology I strongly believe that we need more independent research regarding what we are trying to accomplish with Remote ID in Australia. If determined to be useful, what is the best way to apply technology to achieve the desired outcome? Blindly following an early implementation of another country does not seem wise to me at this time. Industry and government clearly have much more work to do on this issue before implementing Remote ID requirements as many questions and concerns have yet to be considered.