Submission 114 – Anthony R Turner

To the

Department of Infrastructure, Transport, Regional Development, Communications and the Arts.

Remote Identification (Remote ID).

Discussion Paper for Public Consultation.

Please find attached my comments to the above Discussion Paper.

This document outlines some of my thoughts about the whole Remote Identification (Remote ID) thing.

The biggest problem that has caused all the misconception about Drones as they have been coined is that everything has been stuck in the one pot.

I will refer to Traditional Radio Control Fixed Wing Model Aircraft and Radio Control helicopters as Traditional Aeromodelling in this document.

That is Traditional Radio Control Fixed Wing Model Aircraft which have been around for probably 100 years and Helicopters have been around about 60 years or more and have not been the cause of any serious problems as the operators have always operated there Aircraft in a safe manner.
But also have been hidden from the public scrutiny for this time as they have not been in the media focus because there has not been any concerns.
Flying Traditional Models requires many hours of practice usually under the supervision of an experience model pilot. these Aircraft require a lot of skill and practice to be able to fly them, as the operator has to actually fly the Aircraft as there are no magic black boxes that fly the Aircraft for you. This part of aviation has been self regulated, and because of the teachings from experienced pilots they learn all the rules and common sense that is required to safely fly there aircraft. We are al well educated in our chosen hobby, a large number design and build there own aircraft that ca cost many thousands of dollars. So are definitely not going to do anything that will compromise safe flight of there pride and joy.

Then comes along The Quadcopter (Drone) that requires no skill or knowledge to be able to fly. They go and purchase a drone from the shop, take it out of the box charge the batteries and off they go. Attempting to fly this thing with some sort of semblance to control.

They have all sorts of helpers that make it so you can fly with no skill requirements, and as they say the world and his dog goes out and buys one and starts flying with no prerequisites to be able to actually fly one of these Quad-copters they have the ability to fly great distances away from the line of sight of the operator, making it a safety concern.

They have no education on how to fly, where to fly and any regulations that may apply to them. From the documentation that CASA produces including the Know Your Drone newsletter that comes out each month, there non inclusion of anything to do with Traditional Aeromodelling implies that the either have no idea, or that Traditional Aeromodelling does not pose any safety issues.
None of the CASA educational documentation shows any sign of Traditional Aeromodelling types, everything including photos and the diaries are all about Quad-copters. So again this implies they

have no idea or that Traditional Aeromodelling is not a safety risk as it has been for the past 100 years or more.

There needs to be a separation between traditional RC Planes and Helicopters, as far as the general public is aware a Drone is a Quad-copter. You show them the plane the helicopter and the Quad-copter they all will say that the Quad-copter is a Drone, but the Plane is a Plane and the Helicopter is a Helicopter, they have no idea that they are all drones.

In the media it has been pushed that this RID is all about safety, which is far from the truth. Aeromodelling is the safest branch of aviation. No deaths or serious injuries have been reported. And is going to be one of the most highly regulated in the name of safety.
There has been no studies conducted and presented on how safe or unsafe Aeromodelling and Quad-copters are.

As a number of comparisons.

1. When safety belts were introduced it was based on scientific and medical data that persons wearing seat belts are less likely to sustain serious injuries or death resulting from a crash.

2. Again to do with vehicles, the introduction of airbags was based on scientific and medical data.

3. The introduction of bicycle helmets was based on scientific and medical data.

So where is the scientific data from studies that warrant that RID is being introduced for safety reasons, there is none. There appears to be nowhere in the world where a study has been conducted. So safety is not the reason for its introduction.

Each year people are killed and injured in accidents concerning Hang Gliders, Ultra Lights, Para-gliders, that don’t seem to have many regulations as to there operation. Even though there is less of them than Aeromodellers the casualty rate is exceptionally high in proportion, yet it is deemed safer than Aeromodelling because of all these regulations that are being imposed.

I have personally been an Aeromodeller for over 50 years now, flying fixed wing Aircraft and Helicopters and have had no issues with safety or other problems.

As I have said before I live in Rural Victoria and fly in the valleys surrounded by hills in the middle of large acreage farms, where nobody knows that you are there cannot be seen or heard because of surrounding dense bush. There are many people that fly in these conditions, and have done so for many years posing no threat to the safety of anybody or anything. To fit RID devices in these circumstances has no effect as to the safety, and traceability of operator or craft as there is nobody that would ever come within any range to be able to retrieve any information from these craft.

The persons that dream up these ideas sit in ivory towers with polished seats on the pants and have no idea as to what is happening at the grass roots of the Aeromodelling hobby. They are influenced bu what they see in the media that also has no idea as to what this branch of Aviation is about. So spread via scaremongering tactics that all drones are bad.

Then we also have the influence of these large corporations that want to have a monopoly on the sub 400 foot airspace for there delivery Drones. Which are a greater safety concern than the recreational model flyer. These drones fly over people, buildings and roads, and even school yards

full of children. Theses drones I believe are flying autonomously with no control or input from the base station so there is no environment awareness of the current position of the drone.
As been seen in the media lately these drones are prone to failure causing them to fall to the ground from great heights, these drones have a mass with payload over 10 to 15 kgs. Which based on the science will make a mess if it hits something, as was seen in the US an amazon drone crashed and caused a fire, because the battery load in these drones is like a flying hand-grenade. Luckily there was no injuries from this, as they are doing tests in rural areas. So these drones are not very safe. So if somebody is killed ore injured by one of these drones the ultimate responsibility is with the Government Department that authorised these operations as being safe.

Has there been a safety impact study been done on these with hard scientific data, and not the say-so of these corporations.

There has not been any Scientific Safety study that has been published or presented regarding this so called safety issue with drones.

Anthony Turner

Data and access questions

1. Who should have access to Remote ID data and to what information?

2. Should there be a data collection standard?

3. What is the best method of providing Remote ID data to relevant stakeholders?

4. What types of drone operators should be required to carry Remote ID equipment to operate drones? What should be exempt and why?

5. How can Remote ID privacy issues be managed?

SECTION DATA ACCESS QUESTIONS

1. Only enforcement agencies should have access to any information that is generated by any Remote ID devices. The general public should not have any access to the information that is generated by Remote ID devices in real time because of personal safety issues that arise because of being open to attacks from undesirable elements. As this equipment could be stolen for easy cash sales, and the operators life threatened in the process.

I believe it is unconstitutional for a Government department to knowing and recklessly put the lives of fellow Australians in danger to implement something that will create a bigger problem than the non-existent problem they think they are trying to fix.

2. There is no need for a standard as no data should be collected and stored.

3. I today's electronic world with all the big corporations having Cyber attacks, this is a good reason not to collect and store data.

4. Firstly there needs to be a distinction between quad-copters or more commonly referred to as drones, and the aircraft of Traditional Aeromodellers that fly fixed wing RC Planes and RC Helicopters these have been around for over 100 years and have not been a problem. They have pretty much been hidden from the public's eye, causing no concerns at all. So putting them in the same basket as the bad apple Quadcopter (Drone) is very misleading to the public,

I think only persons that fly Quad-copters or drones (as all references to drones by Government and Media is the Quad-copter) should be required to carry RID as they are the ones that are causing all the problems, not the Traditional Aeromodeller.

I believe Fixed Wing Radio Controlled Aircraft and Helicopters should be exempt from Remote ID as the persons that fly these craft are responsible, and actually have common sense as to where and when they fly as can be seen based on the fact they have been out of the public's eye for over 100 years . As this is one of the safest hobbies there is as there are no known fatalities that I am aware off. The only injuries are fingers of us who do not use chicken sticks or electric starter to start our engines.

So to penalise the Traditional Aeromodeller. for the hysteria and fear that has been created by a small minority of Quad-copter operators that has been created by the media about
Is just downright unfair.

5. Don't collect or store the data in the first place.

TECHNOLOGY QUESTIONS

6. Is Remote ID (BRID, NRID or both) an appropriate solution for Australia? Are different types of Remote ID more fit-for-purpose in different contexts or applications? Are there other types (or variations of types) of Remote ID that should be considered?

7. What factors should Remote ID mandates be based on, e.g. location, airspace related, other?

8. What technical requirements, standards and governance arrangements should be considered in the introduction of Remote ID to position for integration with adjacent systems, including the development of the UTM ecosystem?

9. What features does Remote ID require to ensure tamper resistance and to mitigate security issues (including Cyber risks)?

6. Remote ID is not an appropriate solution for Australia, see answer 7.

7. Remote ID mandates if they were implemented need to be based on location and airspace related.

Topographically a lot of Australia is not suited to any form of Remote ID

As an example of this I live in Rural Victoria in an area that is all hills and valleys so maned Aircraft are not a problem, the only problem is when they crash into the hills as a helicopter did recently. I fly in the middle of a farm so there is no-one within range of me to actually pick up any signal from one of these devices. And as far as NRID goes we don't get phone service most of the time because I am in a valley, so NRID is a non event for where I live, and a lot of Australia is the same. And where I fly nobody see's or hears me, so it is a waste of time and effort to have Remote ID fitted to any of my craft.

8. don't introduce them because of reasons outlined in other places in this submission.

9. Don't have them so they cannot be tampered with. As has been seen in social media recently there are many ways to legally circumnavigate these devices. And use these devices to create havoc at major airports. So the implementation of this system will create major headaches for those concerned

USAGE QUESTIONS

10. What impacts could mandatory equipage have on drone operators?

11. Should mandatory equipage be rolled out to all drone operators, or phased through types of operators and/or operations?

12. Are there existing standards that should be considered/adopted to facilitate Remote ID uptake in Australia?

13. Who should we be engaging with, particularly outside of the aviation industry (e.g. telecommunications providers)?

10. There are several things that may impact operators and that is .

1. the cost involved in having to fit this equipment to all of there craft. (I personally have about 40 fixed wing aircraft and helicopters, so to fit each one with a module is prohibitive for me.)

2. Having to worry about the fact that anybody will be given the data as to where the operator of the craft is, and because of this there personnel safety is at risk. This will be a greater worry for parents knowing that the position of their child is being broadcast so any stranger can come and attack them and at worse cause personal injury to them.

3. Will drive a great number of participants in this wonderful hobby away from it.

4. A lot of people will just fly anyway without any remote ID devices as they have been doing for many years without any problems to the safety of others and the belongings.

11. I think it should be rolled out to commercial operators only and forget about the rest.

12. They only things that I can think of is the extra congestion that this will cause to the radio frequency bands that it is proposed to use and will this equipment and its use comply with the current regulations on the use of the radio frequency spectrum.

13. If you plan to use the telecommunication providers towers and equipment, you need to consult with them, because who is going to pay for the bandwidth that will be used to implement this system. They certainly won’t be giving it away for free.