

Submission 94 – AMAS Inc.

23/07/2023

The Secretary.

Mr Jim Betts
The Department of Infrastructure,
Transport, Regional Development,
Communications and the Arts

Dear Mr Betts,

Re: Remote Identification Discussion Paper for Public Consultation.

The AMAS seeks to provide a response(Have your say) for consideration.

Introduction;

The Australian Miniature Aerosports Society Inc (AMAS) was incorporated in 2012 to cater to the needs of the hobbyist sport flyer, and the society is one of a number of National model aircraft sporting bodies. For the first time in history of aeromodelling in Australia aero-modellers have had a genuine choice for alternative provision of training, safety information, technical expertise, member and club management assistance, education and insurance representation at a National level and so it may come as no surprise that the AMAS is the fastest growing model aircraft society in Australia with members and clubs in all states and territories. The society also provides audience to non member recreational operators.

The AMAS Inc is uniquely structured to assist hobbyists and recreational operators directly, and this could not be said of any other like minded society. The AMAS Inc is proud of its excellent safety record and this is attributed to our culture and training systems (Audit information available on request). The AMAS Inc is recognised by the CASA as a National Model Aviation Society.

AMAS Inc members come from all walks of life and participate in all disciplines of the sport/hobby. (Competition, Aerobatic, Large heavy models, Helicopters, Light weight Indoor flying, Gas Turbine Jets, Mulirotor, Control Line, Free Flight aircraft and most importantly flying for recreation).

The AMAS Inc seeks to promote safety above all and will work with (and has) all federal, state, local authorities.

As per the **Remote Identification (Remote ID) Discussion Paper for Public Consultation June 2023** chapter 8, have your say:

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

If deemed to be a requirement, the AMAS considers only a single federal agency would be efficient/cost effective/secure. Furthermore, " collection of information should be directly related to the management of a specific safety related risk and applied to the management thereof" "The application of information for compliance and enforcement action should only be applied where no other option is available" "Access to information should only be available to relevant and authorised individuals in relation to the management of a safety related risk and under the direct authority of a legislative provision" "Information should not be made available to commercial entities or individuals, nor to the general public "

2. Should there be a data collection standard?

If deemed a requirement, the AMAS considers standards, as is the case in manned aviation, be considered.

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

The AMAS considers data provision compliant to legislation/legal/privacy requirements.

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

The AMAS considers mandatory remote ID be required on commercial RPAS providing another level of safety. Within the recreational sector the society considers drone operations **outside** of designated/formerly identified flying areas be equipped with remote ID giving an extra level of mitigation to safety. Those operations being conducted **within** designated flight areas*, such as Model Aircraft Society sites, council designated areas (**Annex A**), education facilities are to be exempt given the inherent education (including council signage), skill, knowledge and experience within the operators at such flying sites.

***Note:** Full disclosure: The AMAS has provided the CASA with documented member flight areas similar to the FAA-Recognized Identification Areas (FRIAs).

5. How can Remote ID privacy issues be managed?

The matter of how comes down to the technology being as secure in all the designed usage phases as possible by the relevant stake holders.

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?

In some cases, no, network coverage is a factor. Recreationally, RID components form cost, service providers costs and perceived coverage(limitations). Broadcast ID also unfortunately presents limitations not conducive to acceptable outcomes.

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

Recreationally, the factors of how much education is being conveyed to the public, by the government, regarding safe operation of COTS drones is a cornerstone factor. Within that education comes the provision of knowledge for operators to know ALARP safety mitigations as applied to locations, airspace, events and similar.

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?

All technical requirements, standards and governance is to be applied.

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

No amount of tamper resistance will prevent tampering. Also, the ability for nefarious operation of RID hardware is a serious factor to be considered and can present a large failure of any benefit the RID system is supposed to provide.

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

Cost, non-take up, variance (reduction) to career opportunities, STEM pathways affected negatively,

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

Mandatory RID equipage **should not** be rolled out to **all** operators. RID should be phased through type (commercial for example) operators and considered for some recreational operations(Refer 4.)

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

Yes.

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

Just as the telecommunications providers were involved in the initial drone registration process, these providers are to remain inclusive to the current consultation.

Thank you for the opportunity to "Have our say".

Yours sincerely,

[Redacted Signature]

Secretary, on behalf of the AMAS Inc Committee.

[Redacted Signature]

[Redacted Signature]

Note: This submission can be made public.

