

# Response ID ANON-T4DG-ZCXN-P

Submitted to **Call for evidence: Electronic Conspicuity Solutions**

Submitted on **2019-05-25 18:37:16**

## Introduction

### 1 What is your name?

**Name:**

ARPAS UK

### 2 What is your email address?

**Email:**

rupertdent@arpas.uk

### 3 Are you contributing to this call for evidence as an individual or on behalf of an organisation?

Organisation

**Please include the name of the organisation:**

ARPAS UK

**If responding on behalf of a larger organisation, please make it clear who the organisation represents and, where applicable, how the views of members were assembled.:**

ARPAS UK represents PfCO holders, the emergency services and some leisure drone users in the UK. Members views have been solicited via email. We have taken into account what those members who replied have said. Some of our members have responded directly to the call for evidence.

### 4 What option best represents your interest in contributing to this call for evidence?

**General aviation:**

Other (please specify below)

**Other airspace users:**

UAS / drone operators

**Aerodromes:**

**Air traffic services:**

**Manufactures or suppliers of EC solutions:**

**Key institutions:**

**If other please specify:**

## Call for evidence questions

### 1 Should the CAA act to coordinate the adoption of interoperable EC solutions in targeted blocks of airspace?

Yes

### 2 Do you agree with our strategy to coordinate the full adoption of interoperable EC solutions in targeted blocks by using location specific mandates?

Yes

### 3 What EC functions should the CAA focus on when coordinating adoption?

A combination depending on the need.

### 4 What evidence should be used?

**What evidence should be used?:**

The sources of evidence that have been highlighted in CAP 1777 seem to us to be very comprehensive. The only additional evidence that we feel would be worth exploring is the state of development of current sub 20kg UAS flight planning applications, that are already being used for autonomous VLOS flights. The wealth of geolocated data, including the planned trajectory of the UAS airframe, its altitude and speed may already be at a stage whereby with some small additions it could be made available to an ATC, in a way that enhances safety, in particular for flight in or close to an FRZ.

**What evidence should be used?:**

No file was uploaded

**5 Have all the options been considered?**

**Have all the options been considered? :**

We believe that the options highlighted in the proposal are the ones that should be considered.

**Have all the options been considered?:**

No file was uploaded

**6 Do you have any specific feedback on the suggested approach?**

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It is worth noting that the civilian commercial UAS market is currently focused on data capture over relatively small areas that do not very often exceed 25 hectares. Aside from filming on a specifically chosen location, inspection of assets such as solar plants, bridges, roads, railways, farm crops, wind turbines etc all mean that activities are geolocation driven. Rolling out EC for the purposes of enabling easy and safe access to controlled airspace is currently the highest priority for the UAS community undertaking commercial activities. This is because being granted access to FRZs for the purpose of undertaking an inspection is becoming more of a constraint than it has been in the past. EC would undoubtedly help resolve this.

UAS manufacturers need to be added to the list of stakeholders that should be included in any further calls or consultations on EC. They will be responsible for integrating the equipage requirements into new build UAS.

**Do you have any specific feedback on the suggested approach?:**

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