

Response ID ANON-G42Q-EFDV-3

Submitted to **Charge proposal for the UK Drone Registration Scheme**

Submitted on **2019-06-06 10:55:13**

Online Response

1 What is your name?

Name:

ARPAS UK

2 What is your email address?

Email:

geoff.pugh@arpas.uk

3 Which option best describes your interest in responding to this consultation?

Other

If other please specify:

Drone Trade Association

4 Do you already own a drone?

Yes

5 What is your view on the CAA's proposed charge, in terms of the level and structure of the charge?

Please add your comments here::

ARPAS has received comments from its members which, in addition to the comments made by the committee, are summarised below.

Overall, ARPAS considers the level of the charge as high when viewed in the context of comparable schemes implemented elsewhere, however, it further considers the registration fee itself less important than perceived inconsistencies in its structure - the total costs of which seem excessive on the basis of published information.

The cost structure laid out at paras 3.8 and 3.9 of the consultation document allocates a total of £0.95m for 'registration system improvements' with a reference to para 2.2 where these are described. Para 2.2 refers briefly to the need to design the system to be 'accessible via mobile devices and personal computers'. Given that this figure amounts to greater than a third of the anticipated ongoing annual costs, ARPAS requests greater justification for and clarity on the calculation of this figure. What additional 'functionality and services' are included?

The cost structure laid out at paras 3.8 and 3.9 of the consultation document allocates a total of £0.3m for a major national drone safety campaign. Drone safety is already heavily promoted by the Dronesafe.uk website (Drone Code), by the >40 National Qualified Entities providing training and assessments of piloting competence to commercial operators and recreational pilots, by the CAA's existing partnership campaign with Jessops to tackle drone misuse and by the many other organisations and initiatives focussed in this area. To what extent is this additional campaign considered necessary?

The scheme is committed to being an 'entirely digital service that will not require human processing by the CAA other than resolving individual queries or problems' yet the consultation document includes the cost of CAA drone registration team members (para 3.9). ARPAS requests clarity on the need for registration team members when resolving such queries could be achieved through existing or external resource.

There is little perceived benefit in requiring annual registrations in full and this period should be extended. Reduced charges for subsequent renewals on confirmation that the data held is still correct should be considered.

6 Do you have alternative ideas about how the CAA could cover the costs of running the registration scheme?

Yes

If Yes, please add your comments here::

ARPAS considers that the registration scheme is intended to benefit all airspace users and therefore elements of the costs could be shared. It has also been suggested that the registration system could also be extended to cover other airspace users not currently included in a registration scheme. This might become a more compelling requirement when the results of the electronic conspicuity consultation are made public. Wider adoption of EC amongst a greater proportion of airspace users will necessitate greater registration requirements, increasing the numbers of users and sources of funds and therefore potentially decreasing the cost per user.

The current emphasis is on registering (and charging) the operator and not the pilot yet both are required to achieve the competence. This is a regressive charging scheme where organisations with large fleets of aircraft would pay the same as individual hobbyists. This does not reflect the relative risk and/or benefit associated with each operation.

Costs could be shared between those who intend to benefit from access to the data i.e. law enforcement, security services etc.

Overall costs could be estimated over a longer period (e.g. 10 years) and spread evenly which could lead to a reduction of the current annual estimate of £2.8m.

Consider adding separate pilot and hull charging as an alternative to the operator in order to target actual drone usage.

7 Are the CAA's estimated volumes appropriate for the make-up of drone operators in the UK, based on existing sources of data and your own observations?

No

Please add your comments here::

Any decision as to whether model flyers, trade associations and membership groups have to register as individuals or as clubs/groups will make a significant impact on the reliability of this estimate.

Alignment to the European regulations relating to drones of less than 250g but with a camera (not toys) will also have an impact as manufacturers are likely to continue the push to miniaturise.