

27 January 2015

Standards Documentation Coordinator  
Standards Development and Quality Assurance Branch  
Civil Aviation Safety Authority  
GPO Box 2005  
**CANBERRA ACT 2601**

**Email:** [Darren.Angelo@casa.gov.au](mailto:Darren.Angelo@casa.gov.au)

Our Ref: S05-0022

Dear Darren,

## **AIPA COMMENTS ON NPRM 1411AS - UNSERVICEABILITY MARKINGS AND GROUND SIGNALS**

The Australian and International Pilots' Association (AIPA) is the largest Association of professional airline pilots in Australia. We represent nearly all Qantas pilots and a significant percentage of pilots flying for the Qantas subsidiaries (including Jetstar Airways Pty Ltd). AIPA represents over 2,100 professional airline transport category flight crew and we are a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries.

AIPA, through its Safety and Technical Sub-Committee, is committed to protecting and advancing aviation safety standards and operations. We are grateful for the opportunity to comment on NPRM 1411AS - Unserviceability markings and ground signals.

As a general rule, both IFALPA and AIPA strongly support the widest adoption of ICAO SARPs, particularly where international aviation is involved and specifically when the justification for a national difference is no longer valid.

Although no history was given, the differences accepted in Australia as found in the old Rules and Procedures for Aerodromes (RPAs) were mostly justified on the logistical problems faced by more remote aerodromes in complying with ICAO SARPs. It is a great pity that it took such a potentially dangerous incident to highlight the lack of review of old standards, particularly when the costs and availability of compliant runway markings for our international airports was never really prohibitive and is certainly less so now for remote aerodromes than when the difference was first agreed.

AIPA notes that even Edition 6 of Annex 14, at least up to Amendment 11B, does not provide for reduction in marking size for runways of 23m or less as is proposed in the NPRM. It therefore seems sensible that CASA should have put forward some discussion on why that might be the case and whether CASA has made any submissions to ICAO to adopt the proposed reduction in marking size as a standard.

Nonetheless, AIPA recognises that the proposal to create a dual use for the ICAO standard unserviceable taxiway marking as a narrow runway unserviceability marking has a practical outcome for our more remote aerodromes. Some analysis of the visual

conspicuity of a 9m marking on a 23m runway in comparison with a 36m marking on a 60m runway and the associated risk assessment would also have been helpful in the NPRM. While we recognise that this is a change management issue and CASA has many industry participants and agendas to balance, the reality is that the markings have to be such as to reduce the risk of a repeat incident of landing on a closed runway to as low as is reasonably practicable.

With that in mind, AIPA endorses the adoption of the ICAO standard 36m markings and, to the extent that CASA adequately risk assessed the conspicuity of the 9m markings of 18 and 23m runways, endorses the dual use of the 9m markings. We endorse the adoption of the ICAO standard yellow for the taxiway marking.

AIPA looks forward to the publication of CASA's submission to the ICAO Visual Aids Panel recommending the additional use of 9m panels on narrow runways, which we are sure would have widespread benefits in remote and less well-developed economies.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'S. Loney', is centered on a light blue rectangular background.

**Captain Shane Loney**  
**Vice President**

**Mob: +61 416 108 820**

**Email: [government.regulatory@aipa.org.au](mailto:government.regulatory@aipa.org.au)**