

By Email

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Dear Martin,

**AUSALPA SUBMISSION TO CASA:**  
*AIRSPACE MODERNISATION PROJECT – TRANCHE TWO PROPOSALS*

*Lowering Class E airspace for continental Australia; and  
Class E airspace trial – Ayers Rock Aerodrome*

The Australian Airline Pilots' Association (AusALPA) is the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. We represent more than 7,500 professional pilots within Australia on safety and technical matters. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA welcomes the opportunity to contribute feedback to the Tranche Two consultation by the OAR for the proposed Airservices Australia Airspace Modernisation Project (AMP).

**Drip Feeding or Obfuscation?**

AusALPA ideally would prefer to provide comment about the proposals within the AMP in a holistic manner. We have been unable to piece together the intended final form of the AMP from the Airservices' consultation documents.

There appears to be an apparent preference by Airservices to only communicate and consult the AMP in isolated stages - AusALPA has already endured some revised requirements due to feedback on the trickle-feed of the AMP tranches. We have learnt that this may well continue due to future AMP proposals and tranches that may number as many as six in total.

We are most concerned that an environment is being fostered that increases the possibility for systemic and implementation oversights and consequently poor consultation feedback. Furthermore, this trickle-feed and piece-meal approach to

consultation is neither effective for a holistic safety outcome nor is it effective for the efficiency, time and resources of contributing stakeholders.

AusALPA finds this reform-on-the-run modus operandi from Airservices to be most frustrating and unacceptable from a stakeholder perspective. While the communication strategy is the responsibility of Airservices, the OAR should bear no part in facilitating it.

AusALPA stresses that the AMP tranches are necessarily interrelated within the overall provision of Air Traffic Services as well as with the broader system of aviation and therefore the Airservices silo-like consultation strategy involves avoidable and unnecessary policy development risk as well as potentially adverse safety outcomes.

## **The Priority of Safety and the Airservices Act (1995)**

We recently responded to Airservices on their Tranche Three proposal. The comments are equally applicable to the earlier tranches, so we have chosen to reproduce the same criticisms here given the general lack of transparency in Airservices consultation processes.

AusALPA firmly believes that the Tranche Three (and earlier) proposals are focused on cost savings for Airservices and maintaining profit margins rather than on maintaining or improving services for airspace users. We also believe that all of the proposals actually constitute a deterioration of safety levels, despite the requirements of section 9 of the *Airservices Act 1995*:

9 - Manner in which AA must perform its functions

- (1) In exercising its powers and performing its functions, AA must regard the safety of air navigation as the most important consideration.

We were reminded by relevant feedback from 1997 and later relating to the Airspace 2000 and NAS projects that the industry has harboured deep concerns about whether this 20 year effort to replicate the United States National Airspace System has achieved the oft-touted goals of efficiency and lower risk. Importantly, earlier correspondents have reiterated the unchanged *Objectives of the Air Traffic Services* set out in ICAO Annex 11 section 2.2, the very first of which is to “prevent collisions between aircraft”.

Nothing we have seen so far in the AMP specifically and rigorously addresses how that fundamental objective is to be achieved.

## **Risk Assessments and a Systems-Approach**

AusALPA has found some difficulty in addressing Airservices proposals as there is often a lack of detail to them, even after requesting further information and clarification. It is also difficult to believe that this continuing lack of transparency is merely inept rather than deliberate.

We understand that one of the intentions of this consultation is to better inform the risk assessments of the Tranche Three (and earlier) proposals prior to submitting them to the OAR. Nonetheless, AusALPA has ongoing concerns with how the level of risk is being, or is to be, assessed. We have not seen specific work on how the risk has been, or will be, assessed for the AMP Tranche Three (or earlier) proposals, but given recent examples of poorly thought-out proposals from Airservices related to airspace change, to navigation aids and regarding runway Stop Bars (to name a few), we are not confident that a thorough and coordinated risk assessment will necessarily occur.

These proposals did proceed to initial internal policy and design acceptance and, therefore, through the internal Airservices risk assessment process.

With this in mind, AusALPA believes that it is important to stress to Airservices that the use of a risk-based assessment methodology is not the same as a systems-approach. Whilst it is true that these two can coexist harmoniously and in a complementary manner, assumptions that they perform the same function and reach the same outcome are invalid. Risk assessments in complex systems cannot be conducted in as a series of isolated and independent assessments without regard to the interdependencies of each system component.

In proposing changes to a safety critical system, AusALPA believes that it is imperative to consider all the underpinning risks against a defences-in-depth model of risk mitigation of the total system in which they actually occur.

It appears that Airservices is likely to consider that the Tranche Three and earlier proposals are each of a reasonably low risk change to safety. Whilst we dispute that possible perspective, there should be no disagreement that the combination of the proposed set of changes do not build defences-in-depth, in fact, they combine to result in an overall relaxation of defences-in-depth. AusALPA asserts that the proposed changes under the three tranches thus far released compromise rather than enhance the system of safety, creating a greater range of potential latent failure points and an overall deterioration to the system of safety below acceptable levels.

It is imperative that Airservices demonstrates to stakeholders a system-based risk management approach to this and all such proposals. While AusALPA recognises that equity in access to airspace is an issue, current Australian aviation safety policy gives primacy to the protection of fare-paying passengers over other airspace users. The proposals in the first three tranches are not consistent with either of those requirements.

### **Proposals for Downgrading Controlled Airspace (Removal of C over D)**

AusALPA recognises that the proposed removal of “C over D” is a Tranche Three proposal, but we feel that reiterating our advice to Airservices is important in the current OAR review context because it relates to Airservices predilection to lower aircraft separation services to ostensibly redeploy controllers as much as it does to their pursuit of Class E airspace as a preferred outcome.

Both Australian and overseas/international pilot associations have for many years opposed the introduction or expansion of Class E over Class D aerodromes. The most recent submission, prior to this one, was an AusALPA submission: “*AusALPA Submission to the Airservices proposal: The trial of Class E airspace services at Hobart and Launceston airports*” (4 May 2018), which we have attached.

AusALPA wishes to reiterate our firm view that this airspace model constitutes a real deterioration in safety. We note that Airservices are promising to uphold “current levels of safety” when Class C is replaced by Class E:

*“It is proposed to replace the Class C airspace with Class E over these regional aerodromes while ensuring the current levels of efficiency and safety to all airspace users in those areas remain.”*

However, AusALPA strongly believes that these assurances to retain current levels of safety by downgrading airspace classification are a very disturbing development, are unsubstantiated and are more akin to promotional statements than to statements of a genuine commitment to safety. Without labouring on the obvious, within Class C airspace IFR aircraft are separated from all other aircraft and VFR aircraft are a known

entity. In Class E airspace, that is not the case. Worse still, some VFR aircraft may not be visible to ATC in Class E due to a lack of Primary radar or ADS-B fitment to these aircraft.

Airservices has stated that the airspace suits a lower risk model than what is currently associated with it. Notwithstanding our complete disagreement on this point, this still does not alter the fact that reduced separation services will be supplied to airspace users and that this will result in a lower level of safety service than what is currently provided. Thus, AusALPA considers statements about maintaining current levels of safety by changing the airspace classification from C to E to be a complete and utter nonsense.

There exists a great variety of examples that demonstrate that E over D is an unsatisfactory airspace solution and how it enhances rather than mitigates unsafe circumstances. Some of these were provided in the attached submission to Airservices mentioned above. It is fair to say that the majority of Australia's professional pilots are tired of Airservices' persistence in continuing to put "lipstick on this particular pig".

Despite self-serving suggestions of improved efficiency for airspace users of the E over D proposal, AusALPA firmly believes the opposite to be true. One such example would be delays to take-off and departure, or extra tracking requirements, due to uncontrolled VFR aircraft operating through the intended departure tracks from RWYs or SIDs. Reliance upon VFR airmanship and listening-out cannot obviate this scenario from occurring. Whilst it may not become the norm, Airservices certainly cannot assure airspace users that it won't occur and therefore, they also cannot legitimately state that current levels of efficiency will be maintained. They simply have no means of assuring that.

From a safety perspective, relying on "see and avoid" can never reduce collision risk to ALARP.

AusALPA notes that benefits to the VFR community are being touted as reasons for the first proposal of Tranche Three, just as they were for the original introduction of Class E airspace. For example:

*"This will provide VFR aircraft with greater unrestricted access to airspace at these locations, fostering and promoting civil aviation."*

AusALPA considers statements by Airservices that they will help foster and promote civil aviation for the VFR community to be disingenuous pandering to one industry sector at the expense of another. Allowing VFR aircraft to put themselves into situations of closer proximity to IFR aircraft during higher workload phases of IFR flight is a measure of Airservices' disregard towards this aviation sector, nothing more. Of course, there is no justification for increasing the collision risk to IFR traffic.

Furthermore, AusALPA disputes that Class E is a solution to an issue for equity of access for proposals associated with replacing Class C with E. We note that this has repeatedly been a reason provided by Airservices for the E over D proposals yet, it is without question that transponder-equipped VFR aircraft are able to simply obtain a clearance to enter and operate in Class C as equally as an IFR aircraft can. Ironically, replacement of Class C airspace with Class E airspace actually increases inequity of access to this airspace, in that IFR aircraft will still be constrained by a range of clearance restrictions/requirements and the VFR aircraft will not.

Airservices have not provided any data or evidence that their "trickle down" efficiencies model will actually result in any cost savings to airspace users. From Airservices Tranche Three information:

*“In removing the requirement to separate VFR aircraft from IFR aircraft in relatively low density regional areas, resources can be allocated to manage traffic at higher density and higher risk areas.”*

If there are any actual efficiency gains from this “trickle down” model for airspace users, it is extremely difficult to believe that these would be anything other than miniscule. Disguising the proposal as a customer service initiative rather than a self-service initiative for Airservices fools no one.

In any event, AusALPA reminds Airservices that the cost of unsafe practices is far greater than that of safe practices.

## **Class E Airspace – General Comment**

While we understand that we are stuck in the throes of the original Dick Smith plan to replicate the National Airspace System of the United States, AusALPA also considers that there are significant infrastructure, traffic density and cultural reasons for the almost nationwide coverage of Class E and the almost absence of Class G in the US. We are generally at the opposite end of that spectrum and our airspace coverage is practically the reverse case. The most significant differences relate to surveillance infrastructure, radar and communications, and we are yet to be convinced that our current ADS-B and VHF coverage replicate those that underpin the US model.

Importantly, the US model does not suffer from the same airspace transit problems that the AMP has amplified: with Class E having lower levels of either 14,500’ (well below the Transition Altitude) or 1200’/700’/0’ AGL and with essentially no services provided in Class G. The collision risk remains real, almost entirely involving VFR aircraft, despite extensive radar coverage to very low level. We have seen some advice that indicates that FAA officers recognise that the national pursuit of the freedom of the individual to fly almost everywhere with few restrictions compromises their ability to prevent aircraft collisions by excluding non-complying participants.

AusALPA generally does not favour Class E airspace when compared to Class C airspace. This is especially the case for lower level use of Class E, due to greater likelihood of encountering unannounced VFR aircraft during climb/descent in lower airspace.

Feedback from our members was varied but it also reflects our existing concerns and opinions regarding Class E airspace. A representative snapshot of feedback includes:

*“Remove Class E airspace in its entirety.”*

*“I believe [Class E] will be of assistance once established in the cruise, due to the separation services provided, but it will be of no benefit during the climb/descent, as there will still be unknown VFR traffic in the area.”*

*“Most VFR traffic is unpressurised and is below FL100, so the proposal doesn't have an effect on them. Above FL100, IFR traffic will receive more information about any rare VFR traffic there and be separated from other IFR traffic.”*

*“While many perceive class E as an improvement in safety over class G, the reality is the IFR to IFR interactions are rarely an issue. All IFR aircraft are provided traffic information on other IFR aircraft in class G airspace. The real issue is VFR to IFR interactions. We don't know where they are, and 'see and avoid' has many limitations.”*

*“Remove Class E, introduce Class C above 10,000 feet.”*

At altitudes where VFR aircraft are effectively non-existent, the benefits of IFR to IFR separation become the dominate influence where the view is that some controlled



services are better than none. Thus, Class E is reasonably acceptable however Class C would be a genuine improvement in most pilots' opinions. Furthermore, many responses to our survey believe that there will be no or little benefit to efficiency with Class E airspace.

At altitudes and airspace where VFR traffic is more likely, our members recognise that the partial benefits of Class E cruise are outweighed by the increased risks and operational inefficiencies that Class E climb/descent introduces. We believe that with a decrease in the airspace lower level, Class E airspace represents an increasing level to risk. Airspace hubs (i.e. aerodromes) further heighten the likelihood of inappropriate separation encounters between VFR and IFR aircraft, further reducing safety margins.

Importantly, the airspace design needs to cater for the increased operational workload for crews at transition, both on climb and descent, involved in altimetry changes, energy management and checklist requirements.

It is upon this basis that AusALPA is not opposed to the expansion of continental Class E airspace down to FL125. However, this is not to say that we consider Class E to represent the best airspace model for upper levels.

### **Standardisation of Continental Class E Airspace – FL125**

Standardisation can create safety benefits through reduced confusion and ease of expectation and AusALPA recognises that these benefits underpin safety initiatives such as the adoption of Standard Operating Procedures (SOPs). AusALPA understands that Airservices are supporting many of their proposals within the AMP on the basis of the benefits of standardisation.

AusALPA supports standardisation initiatives in principle. However, we are also quite cognisant that a blanket rule to standardise can obviate the genuine reasons why some non-standardisation exists. Standardisation is a worthy goal, but only when it can be shown to maintain risk to ALARP. Standardisation should be fit for purpose and not the cause of any deterioration in the nett level of system safety.

AusALPA understands that the proposed change to continental airspace is, in part, designed to enhance the level of service provision to IFR aircraft and take advantage of improved surveillance capability by increasing the airspace within which IFR to IFR separation services are provided. We support the introduction of this enhanced enroute service provision however, we believe that this increased level of service can only be realised if there exists a matching level of pilot - ATC communications too.

Lowering of the base of Class E airspace will mean that IFR aircraft entering Class E airspace on climb from Class G will require an airways clearance earlier than is currently the case in many areas. Whilst we acknowledge that the enhancement of ADS-B surveillance will assist in the identification process, AusALPA is concerned that there are many problematic VHF communications areas below FL125. Thus, in some remote areas a CTA Lower Level (LL) may require further relays of communications via HF radio or other communication means to Air Traffic Control. This may in turn lead to delays in climb, which can result in increased flight deck workload, more inefficient lower-level flight and increased discomfort for passengers enduring possible lower level turbulence.

Our survey of members garnered a sizeable portion of pilots identifying this as an issue. Two examples of respondents capturing this perspective are comments:

*“Quite often there is no issue with climbing up to FL180 with no delays getting there. Lowering the CTA level could potentially delay climb due to clearance problems.”*

*"I support uniform Class E airspace but only with the essential infrastructure to allow effective implementation."*

AusALPA is not opposing the current proposal for a lower standardisation of the continental Class E (FL125), however we request that the OAR and Airservices consider whether the necessary communications services are consistently available for use by aircraft approaching FL125 during climb. I.e. the consistency of available VHF comms must match the intended standardisation of continental CTA LL.

### **Class E Efficiencies for IFR Operations are Limited and Disappearing**

When the original case for the introduction of Class E airspace was made, efficiencies for IFR operations were later touted as positive outcomes. This has not borne out in practice and any hope that this will eventuate are diminishing or deceased.

Some of these "efficiencies", including IFR pick up, VFR climb/descent and VFR on top, are procedures prohibited to flight crew by most organisations operating larger aircraft under the IFR. Furthermore, the introduction of Part 121 will mean that operations must be conducted under the IFR. We understand that the current provisions in CAO 82.3/5 that permit VFR operations in Class E will cease when CASR Part 121 regulations become active in March 2021.

It is true that not all IFR operations will be conducted under Part 121 but it is true that the vast majority will. In any event, the types of Class E VFR operations mentioned above should be considered as irrelevant in the mix of possible flight efficiency options.

### **VFR Restrictions and Class E Airspace above FL200**

AusALPA would like to comment on the existence of Class E airspace above FL200. Whilst we are cognisant that the Tranche Two proposals do not relate to any airspace changes above FL180, we believe that it is timely to highlight some related airspace inconsistencies.

Access of VFR aircraft to airspace is a reoccurring theme within of the broader Airspace Modernisation Project (AMP) by Airservices. Whilst we have some problems with the overuse of this as a reason for some of the proposed changes, we want to highlight that VFR aircraft are not permitted in airspace above FL200, unless they are suitably IFR 'equipped' and are conducting an 'IFR pick-up' procedure. Thus, genuine VFR operations are unable to utilise Class E above FL200.

Moreover, this restriction effectively means that only IFR aircraft, momentarily operating VFR, would be able to make any use of Class E in a VFR manner above FL200. However, given the operator-based restrictions against pilots utilising 'IFR pick-up' type procedures, and the immanent introduction of Part 121, we question why any Class E should exist above FL200 we believe that it is a redundant airspace classification above this level.

### **Airspace Containment & Continuous Descent Operations (CDO)**

The CASA Airspace Risk and Safety Management Manual sets out airspace containment of Instrument Flight Procedures (IFP) as best practice - they should either be contained in or remain outside of the lateral and vertical dimensions of controlled airspace or designated airspace, wherever possible. Containing approaches wholly within or wholly outside of controlled airspace creates direct safety benefits, particularly through reduction in pilot workload during the critical phases of flight.

We acknowledge that there are some IFPs which cannot physically meet this best practice model due to the proximity of other controlled or restricted airspace. An existing example is the RNAV approach to Toowoomba runway 11, which can initially transition through Oakey controlled airspace before proceeding into Class G airspace. However, AusALPA is firmly of the view that individual deviations from IFP containment best practice must be thoroughly justified on the specific issues at a particular location and not on some esoteric notion of airspace design standardisation at any cost.

Therefore, any discussion of airspace containment must necessarily include consideration of operational techniques, most relevantly CDA in Australian terminology or, more broadly, CDO. ICAO Doc 9931 *Continuous Descent Operations* provides extensive guidance on CDO, particularly in regard to stakeholder issues and the interface with ATS. While it is written primarily in the context of operations within controlled airspace, the principles apply equally to operations that transition to operations OCTA.

One of the important aspects underpinning safe CDO is the concept of providing flight crew with the time and mental space to manage the aircraft flight path and energy state. Avoiding disruptions is a high priority, as is the need for unambiguous ATC communications. AusALPA members are particularly concerned about the operational and safety consequences of exiting controlled airspace at very low levels while executing CDO, simply due to the need to identify traffic OCTA and to self-separate coincident with the aircraft positioning and energy management requirements to commence an IFP.

The Tranche Three proposals for Ayers Rock clearly do not draw upon this same perspective, with the Class E LL proposed to be below the IFP published commencement and missed approach altitude, thereby requiring clearances to exit or enter CTA at times of very high workload.

The Tranche Two Ayers Rock 'trial' Class E LL proposal is only marginally better than the later proposal, given the possibility of other traffic positioning for the IFP only a few hundred feet below but on a different frequency. Nonetheless, AusALPA cannot support this proposal either, because we believe that the increase in workload for pilots and controllers, with a concomitant reduction in monitoring and safety margins would preclude conducting the IFP in any practical way, let alone with continuous descent approach (CDA) procedures.

Both Ayers Rock proposals highlight the Class E design issue when attempting to import the US NAS. The equivalent Class E in the US would go down to the surface in order to provide an IFR-IFR separation service while containing the IFP. However, it is not clear how the collision risk with VFR traffic is managed when the cloud base is very low but still high enough for VFR operations. Self-separation is virtually impossible in such circumstances and ATC separation requires accurate surveillance of all traffic at all levels.

If self-separation is the planned Australian mitigator, then adequate time must be made available to crews exiting CTA. AusALPA believes that the proposed Class E LL airspace step for Ayers Rock is too proximate with typical VFR traffic for the area while making the IFP unacceptably difficult. Our position is that the Class E LL A055 or lower proposals are an adverse airspace design.

### **Ayers Rock Class E LL - Member Pilot input**

Regardless of the airspace classification, the base of controlled airspace is a key factor in workload management issues, efficiency and safety. There was strong opposition



from many of the survey respondents to the CTA LL being too low and respondents noted workload management issues, efficiency and safety as reasons to support their input.

Many respondents also commented on the importance of standardisation of airspace. However, they also noted that this cannot be divorced from the need to ensure that the standardisation does not increase risk or reduce efficiency. AusALPA believes that it is essential to consider all the aspects together and to avoid a narrow focus where only one aspect may have an attractive and positive trait.

A representative sample of the feedback comments related to the Ayres Rock Class E airspace 'trial' are:

*"Class E provides no added safety benefit to IFR aircraft, we have to assume it is effectively Class G given the lack of requirements for VFR aircraft operating in the area."*

*"Currently multiple IFR aircraft operating to/from YAYE from the south-east conflict when on climb/descent below FL180. ATC cannot provide clearance to enter CTA until this conflict is resolved, sometimes resulting in extensive off-track manoeuvring to avoid inbound traffic. Also causes frequency congestion due pilot-to-pilot comms on area frequency."*

*"More Class E airspace will improve the efficiency of simultaneous departing/arriving IFR traffic. Currently there are multiple IFR RPT aircraft operating into YAYE at similar times. Recently I was asked to depart on an alternate radial to avoid inbound IFR traffic on our departure track. Greater Class E would allow ATC to more efficiently separate IFR traffic, in addition to enhancing the overall safety of operations into YAYE."*

*"Unless everyone is ADS-B (or radar) identified, the separation standards could be challenging. The risk in this airspace isn't another IFR aircraft, it is a VFR aircraft that can operate in this airspace without a clearance. So, it will be less efficient and increase workload as we will still need to deal with the CTAF side of things."*

*"Class E shouldn't even exist. From my point of view (A320 pilot) Class G and E do nothing to protect me from the weekend warrior in their light single flying across my path whilst maintaining radio silence even whilst I am trying to contact them. Class G is currently economically unavoidable, but Class E is totally useless."*

*"Air services controllers create more unnecessary work for everyone with low Class E. Class E airspace is a ridiculous and pointless concept."*

*"Further delays with clearances. Further restrictions with handling VFR aircraft (i.e. IFR aircraft are operating on a clearance, and unable to easily manoeuvre to avoid VFR traffic)."*

*"I believe it will be of assistance, once established in the cruise, due to the separation services provided, but it will be of no benefit during the climb/descent, as there will still be unknown VFR traffic in the area."*

*"Separate RPT/IFR traffic more effectively."*

*"The risk is between high performance IFR aircraft interacting with VFR aircraft. Class E airspace does not address this risk."*

As well as a request to provide comment about the CTA LL, we asked our pilot members to indicate which would be their preferred Class E LL in the vicinity of Ayres Rock aerodrome. FL125 was the single largest preference, consistent with continental Class E standardisation and consistent with AusALPA's position that Class E below the transition level is more problematic than it is beneficial.

One respondent with a preference for the Ayers Rock Class E LL to be between A085 and FL125 commented about the A055 proposal:

*"It will increase pilot workload for no added protection from VFR aircraft. I've been based at Ayers Rock in scenic operations in the past. VFR aircraft don't require a clearance in Class E so will continue to be a problem, especially the itinerants. The best thing is really the certified radio operator at the aerodrome. The Class E down lower will just increase procedural workload for IFR aircraft and increase risk and provide no benefit."*

One respondent with a preference for YAYE Class E LL of FL125 commented to support this preference:

*"Enough time to separate from other traffic (mainly VFR) and get a clearance to enter Class E without a delay."*

Notwithstanding the differences in surveillance coverage, many others preferred A085 due to standardisation that they believed was already working well:

*"Because it's the same as the east coast."*

We also provided survey respondents an option to nominate the Airservices' Tranche Three proposal of A045, with related comments including:

*"If the Class E is below the MSA it will force a clearance to be obtained before take-off during adverse weather days."*

*"It needs to be higher than the MSA and missed approach altitude. This keeps the missed approach clear of CTA in the event of Go-around."*

Other comments to the preferred Class E LL included comments such as:

*"We'll burning more fuel down low if we can't get a timely clearance to enter Class E straight away."*

*"Remove Class E airspace in its entirety."*

*"Either leave it as is or put in a Class D Tower and make it a controlled aerodrome."*

## **Ayers Rock Class E LL – AusALPA Positions**

AusALPA always endeavours to contribute proactive ideas to airspace design and review. However, we are averse to firmly providing a final CTA LL 'solution' for Ayers Rock whilst Airservices is limiting AMP transparency and proposal detail from aviation stakeholders.

AusALPA firmly believes that the LL of CTA for Ayers Rock must not be too low.

A CTA LL of A045 is the most problematic and inappropriate of all the proposals. This level is below the MSA and therefore will cause problems for aircraft arriving and departing in adverse weather conditions where Instrument Meteorological Conditions (IMC) exist below the MSA. For arriving aircraft that execute a missed approach, a clearance to re-enter controlled airspace would be required for instances of go-around. For departing aircraft, it would be necessary to obtain a clearance to enter controlled airspace prior to take off. This also has the potential to adversely impact upon the runway occupancy time.

AusALPA believes that other lower level options for the CTA base would likely impact operational efficiency negatively. The aerodrome elevation at Ayers Rock is 1626 feet Above Mean Sea Level (AMSL). For departing aircraft, a CTA LL of A055 is less than 4000 feet AMSL. A CTA LL of A065 is less than 5000 feet AMSL. Notwithstanding that this period of flight is a busy and critical phase of flight with associated tasks and

workload, the high performance of the majority of IFR aircraft operating from Ayers Rock means that 4 or 5 thousand feet is transitioned very quickly and clearance to enter CTA may not always be possible. Therefore, aircraft would either need to remain below CTA until a clearance was obtained or a clearance prior to take-off would be required. Both of these scenarios lead to an increased likelihood of efficient operations.

Exiting controlled airspace on descent at very low levels is also problematic. Arriving aircraft need to identify traffic OCTA and to self-separate, coincident with the aircraft positioning and energy management requirements, to commence an IFP. Self-separating with VFR aircraft whilst adhering to an ATC clearance increases workload and reduces efficiency. Such a scenario increases the safety risk as well.

Beyond the workload, safety and efficiency considerations is the goal of providing meaningful standardisation of airspace. Regarding standardisation of airspace, an appropriate consideration may be to align the CTA LL for Ayers Rock with the proposed continental Class E LL of FL125, provided the surveillance and communications infrastructure is adequate. This maintains a measure of standardisation whilst completely avoiding the problems associated with a CTA LL that is too low over a non-controlled aerodrome.

Aligning the Class E LL for Ayers Rock aerodrome with the LL of enroute controlled airspace for the regional Class D aerodromes of A045 is too low. AusALPA notes that the enroute CTA LL outlined in Tranche Three for the regional Class D towers is already being repealed. If not officially, it is for all intents and purposes.

We note that AIC H25/19 has reversed some of the so-called benefits from Tranche One, diminished standardisation and increased confusion for airspace users. This AIC indicates that A045 and A055 are already unacceptable for use as a standardisation for many aerodromes. Thus, A065 is the first lower level viable option however, that level may also be too low. Without an informed safety case and further information of the whole AMP, this is difficult to properly assess at the likely range of locations and elevations.

Without the whole picture of all the AMP Tranche Proposals, our ability to confidently engage proactively beyond these positions relies upon information which Airservices is yet to provide.

## **Conclusions**

AusALPA supports the Tranche Two proposal to lower continental Class E airspace to FL125 if the supporting communications and surveillance services are available in this airspace.

AusALPA does not support the Tranche Two proposal for a Class E airspace trial at Ayers Rock Aerodrome in its current form.

Class E is an inherently less safe model of airspace classification to that of Class C. Any suggestion that the same levels of safety can be maintained when airspace is changed from C to E is simply false. Furthermore, Class E airspace at lower altitudes results in more of a challenge to maintain acceptable levels of safety because of the increased prevalence of VFR traffic at lower altitudes when compared with higher altitudes.

Whilst we believe that standardisation in principle is good for safety and efficiency outcomes, we note that the current Ayers Rock 'trial' proposal is a standardisation that cannot be achieved without adversely effecting both safety and efficiency. We believe

that it is likely that this 'trial' would necessarily require amendment if implemented in its proposed form, not dissimilar to how some of the Tranche One changes have required a change and realistically were never fit for purpose. We note that AIC H25/19 has reversed some of the so-called benefits from Tranche One, diminished standardisation and increased confusion for airspace users.

AusALPA believes that Airservices should better inform the aviation industry of the content of the remaining AMP Tranches. We also believe that it may be appropriate for the OAR to delay finalising AMP ACP proposals due to the inadequate provision of information contained in the remaining, as yet, unseen AMP Tranches and proposals.

The early tranches have given us little confidence that Airservices adequately understands the relationship between regional airspace design and aircraft operations or the difference in risk appetite between Australia and the US. Any future proposal must reflect system-based risk management and the creation of safety defences-in-depth.

Yours sincerely,



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**Attachments:** 1. AusALPA submission to Airservices on the Trial of Class E Airspace Services at Hobart and Launceston airports - 04 May 2018





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Dear Terry,

**AUSALPA SUBMISSION TO THE AIRSERVICES PROPOSAL:  
THE TRIAL OF CLASS E AIRSPACE SERVICES AT HOBART AND LAUNCESTON  
AIRPORTS**

The Australian Airline Pilots' Association (AusALPA) represents more than 6,500 professional pilots within Australia on safety and technical matters. We are the Member Association for Australia and a key member of the International Federation of Airline Pilot Associations (IFALPA) which represents over 100,000 pilots in 100 countries. Our membership places a very strong expectation of rational, risk and evidence-based safety behaviour on our government agencies and processes and we regard our participation in the work of the Australia's safety-related agencies as essential to ensuring that our policy makers get the best of independent safety and technical advice.

AusALPA recently learnt of the proposal by Airservices Australia (AsA) to trial Class E airspace in Tasmania through our participation at an AsA chaired meeting held after the TAS RAPAC meeting (April 11th). We were previously unaware of any industry-based initiatives to amend the airspace classification and configuration.

Since that meeting, we have reviewed the proposal through the content provided in the projects' section of the Airservices web page. Both AsA sources of information speak positively for the proposal and refer to it as an airspace enhancement and a design solution. Thank you for the opportunity to provide our feedback on this matter.

AusALPA does not share this perspective and views the proposal as a degradation of the airspace rather than an enhancement.

We also question what problem this redesign of the airspace is aimed at solving, since we are unable to identify any safety or operational benefits for our members. Consequently, AusALPA considers that there is no justification for the airspace reclassification for trial purposes or otherwise.

We understand that the Tasmanian VFR community may have a differing view and regard this proposal as an enhancement, though we are not aware of any request by them for the proposed change. AusALPA sought during the Hobart meeting to clarify if any such request had been made by the Tasmanian VFR community, but the AsA



representatives were not able to provide any information that that was the case. Furthermore, one representative from a local VFR based training school confirmed that he was also unaware of any grass roots call for a relaxing of access restrictions to this airspace by local VFR stakeholders. We therefore, conclude that this proposal is not a solution to a request from the VFR community, but rather one that has been made by AsA without proper consultation with the stakeholders.

This contrasts with a recent consultative effort by Civil Aviation Safety Authority's Office of Airspace Regulation (OAR) to consider the utilisation of most of the Tasmanian airspace and the needs of its users.

The OAR conducted a review of the Hobart airspace and provided a report (Aeronautical Study of Hobart, February 2017). The purpose of the study was to evaluate the airspace arrangements and classification for Hobart aerodrome and much of the associated airspace. Many stakeholders were canvassed for feedback so that a considered and informed outcome could be reached. Section 6.2 of that report outlines the consultation that the OAR took with AsA. The report provided three key recommendations and the recommendation which is most relevant to the AsA proposal is Recommendation 1. This recommendation states:

*"The existing airspace classification and architecture (apart from the one CTA step lower limit change, which is already the subject of an airspace change proposal) is appropriate and should remain unchanged."*

Given that the key recommendation from this well consulted OAR report clearly states that there should not be any change to the airspace classification, AusALPA is perplexed as to why AsA now proposes to do the exact opposite.

We note that the OAR report outlines how AsA was consulted and was a key stakeholder and participant during the airspace review. We consider it to be most unlikely that a call for airspace reclassification by AsA at the time of the review would not be included in the report. AusALPA would therefore like to provide AsA with the opportunity to share these considerations, so we can establish a more informed perspective on the proposal. In the absence of such information and based on the clear recommendation of the OAR's review in consultation with all the stakeholders, including AsA, AusALPA strongly objects to the proposal to reclassify part of the airspace.

AusALPA has consulted member pilots and there is a common view that this proposed airspace reclassification will reduce safety margins; make the airspace even more complicated; and pose a higher risk to aircraft operating within it. This applies to both IFR operations and VFR traffic.

The approach and departure phases of flight are relatively high workload phases of flight. Class E airspace increases the need to utilise 'see and avoid' measures when compared to that of Class C or D airspace. This is particularly problematic on descent where small aircraft can be almost impossible to visually detect due an array of ground clutter masking the ability to sight an aircraft. Our membership firmly supports AusALPA's assertion that climb and descent conducted with known traffic in Class C airspace in the often adverse Tasmanian weather means operations are safer. The existing airspace classification is far preferable to that proposed.

AusALPA considers that the risk modelling, if any, for this proposal is woefully inadequate. At the Hobart meeting, we asked about the data AsA used in risk-assessing the merits of this proposal, in order to gain an understanding of why there appears to be a different perspective of safety risk between our organisations. Merely

offering the opinion that "E over D in other parts of the country presents no problems" is not a compelling case for the proposed change.

Furthermore, it was asserted at the meeting that the proposed changes would create 'efficiencies'. AusALPA asked AsA what those efficiencies might be, but no meaningful explanation was provided. We believe that the proposal's efficiencies (if any) are only gained by AsA itself and perhaps a very limited number of airspace users, but only at the expense of the safety of the many.

### CONCLUDING REMARKS

AusALPA remains unconvinced that this proposal is necessary, that it has been sufficiently risk modelled, and that it will provide efficiencies in any meaningful manner.

AusALPA strongly believes that the proposed reclassification of the airspace would result in a reduction of safety protections and an increase in pilot workload, whilst providing no real net savings in efficiencies.

Given that IFR traffic must be provided with a controlled airspace service in either airspace classification, that VFR traffic has the option of accessing the current airspace through a clearance request and that there is no demonstrated need to free up the airspace for greater VFR traffic use without clearances, it is unclear to AusALPA why there is any requirement to change the airspace classification in Tasmania. This is supported by the OAR review.

AusALPA believes that this proposal will result in a degradation of safety rather than an enhancement without any significant operational efficiencies.

AusALPA, therefore, strongly opposes this proposal.

Yours sincerely,



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