



Australian Government

Civil Aviation Safety Authority

# Notice of Proposed Rule Making

## Use of Night Vision Goggles (NVG) in Helicopter Operations

Proposed *Civil Aviation Order (CAO) 82.6*

### Who this NPRM applies to

*It is expected that this proposal will affect helicopter operators and their respective flight crews (pilots & aircrew members) that engage in the following types of operations:*

- *search and rescue*
- *law enforcement*
- *aerial fire fighting*
- *aerial fire fighting support*
- *emergency medical services*
- *marine pilot transfer*
- *training providers who intend to conduct initial or recurrent NVG training*

Issued as part of the process of public consultation by  
CASA's Regulatory Development Management Branch

Document NPRM 0705OS – June 2007



## Foreword

### Background

Night Vision Goggles (NVG) are a head mounted device consisting of a binocular imaging unit, with associated power and counter balance fitments, which uses image intensifying technology to amplify the available ambient light (including low levels of moonlight or starlight) sufficiently for images to be seen through the NVG eyepieces as a monochromatic green image.

NVG technology evolved mainly in advanced military forces, including Australia. In certain strictly controlled circumstances, the use of NVG can enhance crew situational awareness and improve overall flight safety under night visual flight rules (NVFR). In light of this, formation of a NVIS trial and monitoring project was established to facilitate the use of NVG in certain civil aviation operations, namely, night time helicopter search and rescue, law enforcement, aerial fire fighting, aerial fire fighting support, emergency medical services, marine pilot transfers, training for any of these, demonstration flights and positioning flights (the *permitted NVG operations*).

### Purpose of this NPRM

The purpose of this NPRM is to introduce and invite consultation on a rule making initiative that codifies NVG into Australian aviation law.

Civil Aviation Order 82.6 establishes operational and airworthiness standards and requirements for the use of night vision goggles (NVG) in specialised helicopter operations. The CAO has the effect of making any other use of NVG as primary means of terrain avoidance unlawful. The CAO is an interim measure pending finalisation of Civil Aviation Safety Regulations 1998 (CASR) Part 133 which will cover rotorcraft operations generally which is still under development. In transferring the CAO to the CASR Part AMC and GM will be adopted to further promote an outcome based approach.

CASA and the Helicopter Association of Australasia have worked together as a project team along with industry stakeholders since 2001 for the express purpose of developing NVG standards. It was also intended that the standards comply with the latest international developments. As a result there was extensive consultation with the following international regulators:

- FAA
- Transport Canada
- NZ CAA
- UK CAA

This document reflects the results of that work.

## Proposed changes in a page

The proposed regulations will establish a safety regulatory framework through Civil Aviation Order (CAO) 82.6 and supporting Civil Aviation Advisory Publication (CAAP) material for the use of NVG in specific helicopter operations.

The **time-conscious reader** can obtain a quick appreciation of this NPRM through the **Proposed Significant Changes in a Page** (refer to NPRM Section 2). A more detailed **Synopsis of the Change Proposals** is provided as background (NPRM Section 3).

If you require complete information about the change, refer to **Annex A of this NPRM** for the technical working draft of proposed CAO 82.6. The draft CAAP is in **Annex B of this NPRM**.

## How you can help us

**CASA is responsible under the Civil Aviation Act 1988, amongst other functions, for developing and promulgating appropriate, clear and concise aviation safety standards. In the performance of this function and the exercise of its powers, CASA must, where appropriate, consult with government, commercial, industrial, consumer and other relevant bodies and organisations.**

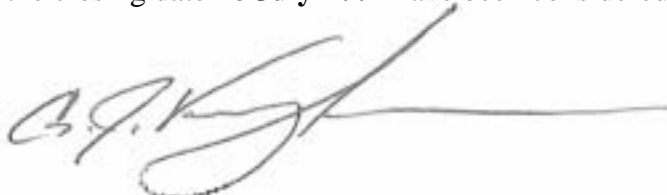
*Civil Aviation Act 1988 Subsection 9(1)(c) and Subsection 16*

**“CASA is committed to working cooperatively with the aviation industry to maintain and enhance aviation safety. This is especially important as far as the development of standards and regulatory material is concerned.”**

*CASA Standards Development and Rule Making Manual, 2.6.1*

To ensure clear and relevant safety standards, we need the benefit of your knowledge as an aviator, aviation consumer and/or provider of related products and services **by completing the Response Form (in this NPRM) and returning it to CASA by 16 July 2007**

I would like to thank you for expressing interest in this proposal and emphasise that no rule changes will be undertaken until all NPRM responses and submissions received by the closing date **16 July 2007** have been considered.



Greg Vaughan  
Group General Manager  
General Aviation Operations

14 June 2007

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<p>A web-based online response form is offered as an alternative to the printed form in this NPRM. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type <a href="http://rnp.casa.gov.au/respond">rnp.casa.gov.au/respond</a> into your web browser and follow the links for this NPRM.</p>	
<b>Annex A – Proposed Civil Aviation Order (CAO) 82.6 – Use of Night Vision Goggles (NVG) in Helicopter Operations .....</b>	<b>A1</b>
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## Abbreviations

<b>AGL</b>	Above Ground Level
<b>AIP</b>	Aeronautical Information Publication
<b>ALARP</b>	As Low as Reasonably Predictable
<b>AMC</b>	Acceptable Means of Compliance
<b>ANVIS</b>	Aviator Night Vision Imaging Systems
<b>AO</b>	Air Operator
<b>AOC</b>	Air Operator's Certificate
<b>AOCM</b>	Air Operator Certification Manual
<b>AS</b>	Australian Standard
<b>ATO</b>	Authorised Testing Officer
<b>ATS</b>	Air Traffic Services
<b>CAA</b>	Civil Aviation Authority (of the UK)
<b>CAAP</b>	Civil Aviation Advisory Publication
<b>CAO</b>	Civil Aviation Order
<b>CAP</b>	Civil Aviation Publication (UK CAA)
<b>CAR</b>	Civil Aviation Regulation
<b>CASA</b>	Civil Aviation Safety Authority
<b>CCF</b>	Capability Check Flight
<b>CG</b>	Centre of Gravity
<b>CP</b>	Chief Pilot
<b>CRM</b>	Crew Resource Management
<b>EMS</b>	Emergency Medical Services
<b>FAA</b>	Federal Aviation Administration (of the USA)
<b>FOI</b>	Flying Operations Inspector
<b>FOR</b>	Field of Regard
<b>FOV</b>	Field of View
<b>FRMS</b>	Fatigue Risk Management Systems
<b>G</b>	Gravity
<b>GM</b>	Guidance Material
<b>HF</b>	High Frequency
<b>HLS</b>	Helicopter Landing Site
<b>HUD</b>	Heads Up Display
<b>ICAO</b>	International Civil Aviation Organisation
<b>ICUS</b>	In command under supervision
<b>IFR</b>	Instrument Flight Rules
<b>IMC</b>	Instrument Meteorological Conditions

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<b>IR</b>	Ice on Runway
<b>IRM</b>	Immediately Reportable Matters
<b>JAA</b>	Joint Aviation Authorities (of Europe)
<b>JAR-OPS</b>	Joint Aviation Requirements Operations (of the JAA)
<b>LSALT</b>	Lowest Safe Altitude
<b>MIL-STD</b>	Military Standard
<b>MOPS</b>	Minimum Operational Performance Standard
<b>nm</b>	Nautical Miles
<b>NOTAM</b>	Notice to Airmen
<b>NVD</b>	Night Vision Device
<b>NVED</b>	Night Vision Enhancement Devices
<b>NVFR</b>	Night Visual Flight Rules
<b>NVG</b>	Night Vision Goggles
<b>NVIS</b>	Night Vision Imaging Systems
<b>NZS</b>	New Zealand Standard
<b>OEM</b>	Original Equipment Manufacturer
<b>PIC</b>	Pilot-in command
<b>RIFTO</b>	Restricted Instrument Flight Take-off
<b>RRM</b>	Routine Reportable Matters
<b>RTCA</b>	Radio Technical Commission for Aeronautics
<b>RTCA/DO</b>	Radio Technical Commission for Aeronautic Document
<b>SAR</b>	Search and Rescue
<b>TCO</b>	Training and Checking Organisation
<b>TEM</b>	Threat and Error Management
<b>TSO</b>	Technical Standard Order
<b>UK</b>	United Kingdom
<b>USA</b>	United States of America
<b>VFR</b>	Visual Flight Rules

## 1. The Consultation Process

1.1 CASA is committed to working within its statutory obligations, in partnership with the aviation community, to maintain and enhance aviation safety. The Standards Consultative Committee (SCC) is a joint industry/CASA forum set up to involve the aviation community formally during the development of regulatory material. It is understood that representatives of the SCC's Operational Standards Subcommittee initially provided valuable input to the development of NVG standards with subsequent standards development specifically in association with industry groups and sectors.

1.2 The proposed draft of CAO 82.6 is at a mature stage of development. The draft directions and associated conditions it contains have evolved over a significant number of years of consultation, including:

- participation and consultation with joint FAA/TC/JAA working group on international standards for the use of NVG in helicopter operations;
- consultation with the Helicopter Association of Australasia (HAA) on developing Australian standards;
- in January 2007 CASA convened a meeting with the HAA to review the draft legislation and propose a 12 month trial of the legislative safety standards. CASA assured industry that it would conduct a review of international standards prior to the proposed trial commencing to ensure that Australian standards were equal or better and not overly restrictive but more importantly were adapted to the Australian operating environment. This has been done. In addition the trial will monitor the legislation to see if areas within the legislative safety framework can be relaxed, if any ;
- in February 2007 CASA invited the helicopter industry to participate in a 12 month trial of NVG standards commencing in July 2007;
- in February/March 2007, CASA NVG FOI's convened a meeting in Orlando Florida at the Helicopter Association International (HAI) conference with NVG specialists from the FAA, TC, & NZ CAA to ensure proposed standards aligned with overseas regulatory requirements;
- in February/March 2007 CASA NVG FOI's meet with various operators throughout the USA to discuss the use of NVG from an operators perceptive in various roles. Operators conducting the following helicopter operations were specifically targeted: Fire, EMS, SAR, Law Enforcement, NVG Training;
- in February/March 2007 CASA NVG FOI's attended the HAI conference and reviewed the latest NVG technology developments for both the goggles and the associated cockpit/aircraft lighting modifications;
- in March 2007 CASA NVG FOI's attended 2 weeks NVG training with US NVG specialist training school – Aviation Specialties Unlimited. The purpose of the training was to regain currency and review the FAA approved US course, as this was the basis for the proposed Australian course. This training provider has provided NVG training since 1999 and is currently the NVG training provider to the FAA and NZ CAA; and

- in April 2007 CASA convened a meeting in Sydney with helicopter industry participants and industry observers to educate proposed NVIS helicopter operators of the parameters of the 12 month NVIS trial, the applicable legislation (CAO 82.6 and CAAP 174-1), details of quarterly industry meetings and recommendations based on lessons learnt during the trial.

1.3 This NPRM (NPRM 0705OS) is the latest stage in a regulatory development process spanning several years.

### **An invitation for public comment**

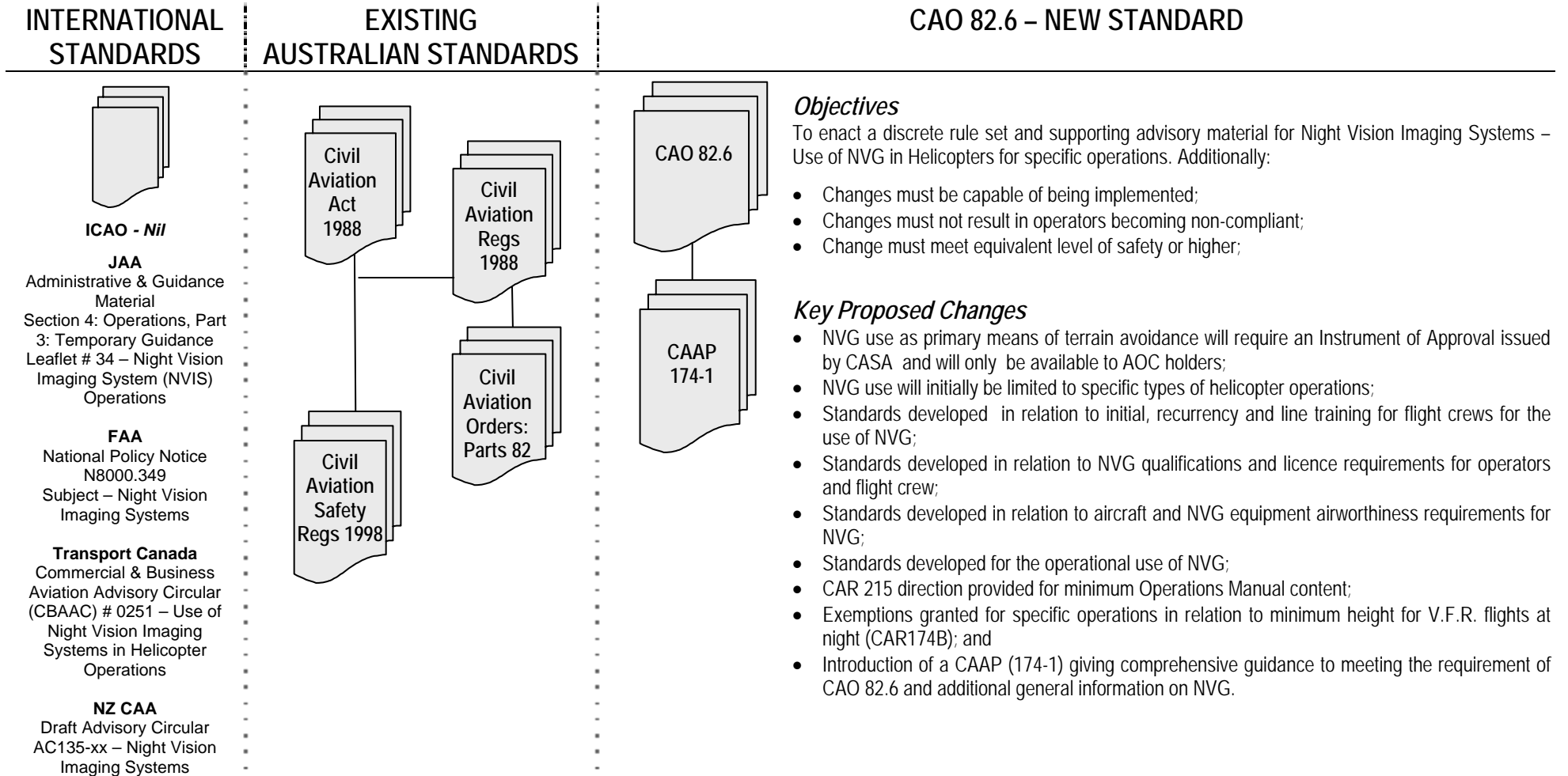
1.4 NPRM 0705OS reflects the proposed CAO 82.6 as a result of the extensive participation by CASA in international forums, consultation with stakeholders and other regulatory authorities.

### **What happens to your comments?**

1.5 At the end of this NPRM's response period for public comments, all submissions will be analysed, evaluated and considered. Subsequent to the closing date for comments, a Notice of Final Rule Making (NFRM) will be prepared and made publicly available in conjunction with the making of the final rules.

1.6 CASA is required to register each comment and submission received, but will not individually acknowledge a response unless specifically requested. The names of contributors will be published in the subsequent NFRM, except where CASA is specifically requested not to do so.

## 2. Proposed Changes in a Page



## 3. Synopsis of the Change Proposal

### 3.1 Purpose

3.1.1 The purpose of this NPRM is to expose for public consultation the proposed rule set that has been developed by CASA, working together with the HAA and affected helicopter industry operators in relation to the use of NVG in specific helicopter operations.

### 3.2 Background

3.2.1 As a result of helicopter industry demand and overseas developments in relation to the use of NVG for civilian helicopter operations, in 1999 CASA approved project number OS 99/19 – Standards for use of NVG in helicopter operations. In 2001 the project was transferred to project number OS 01/09 – Use of Night Vision Goggles (NVGs) / Night Vision Devices (NVDs) in helicopter operators.

3.2.2 The purpose of the project was to develop the operational and airworthiness standards and requirements for the use of night vision goggles and devices by helicopter operators, for flight at night when engaged in Search and Rescue, Law Enforcement, Emergency Medical Services, Aerial Fire Fighting, Aerial Fire Fighting Support, Marine Pilot Transfer and NVG Training.

3.2.3 To date, CASA has been working primarily with the Helicopter Association of Australasia (HAA) to develop the legislation and standards in relation to NVG use. This relationship will continue with expansion to embrace the total helicopter industry via an industry/CASA consultative working group over the trial period.

3.2.4 Initially the project will be limited to helicopter operations (originally intended for inclusion as a Subpart in the proposed CASR Part 133), but the standards and requirements may be extended to similar fixed wing operations (in CASR Part 136) in the future.

3.2.5 To ensure the legislation meets the operational requirements of civil operators in Australia, CASA will conduct a 12 month trial of the proposed rules approving the use of NVG with ongoing joint reviews between CASA, the industry, and international legislators invited to observe. This will allow the standards and legislation to be fine-tuned prior to them being incorporated in the Civil Aviation Safety Regulations.

3.2.6 To ensure operators are not disadvantaged during the development and NPRM / NFRM process of CAO 82.6, an Instrument of Approval based on CAO 82.6 is available. This will self cancel on the release of CAO 82.6.

### 3.3 Objectives

3.3.1 The main objectives of the proposed rules are to provide a safe legislative framework that provides clear, workable standards applicable to Australian helicopter operators when conducting NVG operations by:

- consolidating one discrete rule set within the current regulatory regime, for helicopter operations that meets similar standards imposed by overseas regulators in relation to NVG;
- allows for refining the legislation prior to incorporation into CASR Part 133;
- ensuring an up to date operational rule set that reflects the technological advances in aviation and NVG; and
- ensures that the rules do not reduce CASA's ability to realise positive safety benefits.

3.3.2 A more detailed description of the proposed technical working draft rules for NVG can be found in Annex A of this NPRM.

### 3.4 Options Considered

#### Issues considered by CASA in developing options

3.4.1 The CASA project team considered the following issues to determine the best option for the proposed legislation in relation to the use of NVG by helicopter operators:

- In response to helicopter industry demand for NVG and the fact the Australian legislation was silent on the use of NVG CASA considered and reviewed international developments concerning the regulation and guidance of NVG use in specific helicopter operations.
- In developing the legislation CASA was to take into consideration that there has been no civil helicopter NVG operations within the Australian operating environment. To assist a 12 month trial was considered to refine legislation with regular reviews prior to implementation in CASR Part 133.
- CASA's CEO has stated that future regulatory development would be achieved by using small focussed teams, within operational areas, to tackle individual regulatory packages.
- The CEO stated that any new rule set would not be developed in isolation of world best practice. CASA has considered approaches undertaken by other regulatory authorities such as the FAA, NZ CAA, UK CAA and TC.
- It is the intent that NVG legislation will eventually sit in CASR Part 133 as part of the operational requirements, however NVG provisions have been reserved pending the outcome of NPRM and the 12 month trial of CAO 82.6. prior to inclusion into Part 133. In making this transition to the CASR's the NVG CAO will be broken down into regulations, AMC's and GM material following the trial further facilitating the concept of outcome based rule making.
- CASA is committed to developing and making a suite of rules covering NVG for helicopter operations, and has given undertakings to stakeholders and to overseas regulators to this effect.

## Options

3.4.2 **Option One – (Preferred Option)** Develop the NVG legislation jointly with the HAA and industry. After a review of current international practice in relation to standards for NVG use, develop the legislation as a CAO (82.6) supported by CAAP (174-1). Trial the legislation and standards for a 12 month period with quarterly stakeholder meetings to review and refine the legislation. On completion of the trial conduct a review of the 12 month period and a decision is made to either:

- Extend the trial to further refine and develop legislation; or
- Transfer the legislation into CASR Part 133.

3.4.3 **Option Two** - Develop the NVG legislation jointly with the HAA as a stand-alone project and then implement the rules into CASR Part 133.

3.4.4 CASA considered the first option which meant developing the applicable standards, directions and conditions for NVG under a CAO (82.6) supported by a CAAP (174-1), (after a review of international practices) and trialing the legislation with regular input from affected industry stakeholders over the 12 month period. The overall intent is to move the legislation into CASR Part 133. As it is more onerous to amend CASR as opposed to a CAO, this option allows greater flexibility during the trial period to amend the CAO should any safety matters be identified. This will also ensure that the legislation is workable for operators prior to incorporation into CASR Part 133. In addition stakeholders will gain direct benefit from input into the development of the CASR whilst trialing the CAO. This is to ensure that the legislation meets safety requirements, and that it is clear, concise and harmonised rules. This option also aligns with the considerations and CEO's objectives as detailed in 3.4.1

3.4.5 The second option has the advantage of expediting the implantation of the NVG legislation into CASR Part 133 in a shorter time frame. However, there are two main considerations:

- Part 133 is not fully developed yet, and CASA did not want to disadvantage operators by further delaying the NVG legislation; and
- There has never been any legislation in relation to civilian helicopter operations in Australia on NVG. A completely new set of standards has therefore been developed for this purpose. In order to expedite regulatory guidance material permission has been developed followed by the CAO rule set. This will then be transitioned into CASR Part 133.

## Recommendation

3.4.6 CASA recommended to its senior management, that along with unanimous stakeholder support, it should continue with its commitment to NVG by progressing such legislation as a CAO and supporting CAAP as described in Option 1, prior to incorporation into CASR Part 133.

3.4.7 CASA management has assessed the recommendation and believes it is achievable from both a resource and regulatory strategy point of view.

## 4. Description of the Change Proposals

4.1 The **key proposed changes** and most significant rule changes from a safety perspective include:

- NVG use as primary means of terrain avoidance will require an Instrument of Approval issued by CASA and will only be available to AOC holders;
- NVG use will initially be limited to specific types of helicopter operations;
- Standards developed in relation to initial, recurrency and line training for flight crews for the use of NVG;
- Standards developed in relation to NVG qualifications and licence requirements for operators and flight crew;
- Standards developed in relation to aircraft and NVG equipment airworthiness requirements for NVG;
- Standards developed for the operational use of NVG;
- CAR 215 direction provided for minimum Operations Manual content;
- Exemptions granted for specific operations in relation to minimum height for V.F.R. flights at night (CAR174B); and
- Introduction of a CAAP (174-1) giving comprehensive guidance to meeting the requirement of CAO 82.6 and additional general information on NVG.

## 5. Impact of the Proposed Changes

### 5.1 Impact of Changes

5.1.1 CASA intends that the NVG legislative suite will provide for enhanced safety for helicopters conducting specific operations at night. These operations include: Search and Rescue, Law Enforcement, Aerial Fire Fighting, Aerial Fire Fighting Support, Emergency Medical Services, Marine Pilot Transfer and Training providers who intend to conduct initial or recurrent NVG training.

5.1.2 Many of the changes proposed are considered significant both in terms of safety and operational costs, but it is agreed by stakeholders that the new arrangements will provide a greater level of safety to such operations.

### 5.2 Persons Affected

5.2.1 The persons and organisations who will be affected by the proposed NVG suite of rules are operators and personnel involved in the operation of helicopters conducting specific operations, including:

- AOC holders who operate helicopters and conduct the following operations:
  - Search & Rescue;
  - Law Enforcement;
  - Aerial Fire Fighting;
  - Aerial Fire Fighting Support;

- Emergency Medical Services;
- Marine Pilot Transfer; and
- Training providers who intend to conduct initial or recurrent NVG training;
- their flight and other crew members;
- their ground support personnel;
- NVG Testing Officers; and
- CASA FOI, AWI and regulatory services staff processing NVG approvals.

### **5.3 Benefits and Costs of the Proposal**

5.3.1 A significant benefit is the enhanced operational safety advantages for helicopter flight operations at night. However, NVG do not turn night into day and like all technology have some limitations. They should only be used if aircraft are appropriately equipped and flight crews appropriately trained in the technology. This can only occur if operators and flight crews are given a clear set of operational standards and guidelines in relation to training and the operational use of NVG. The development of CAO 82.6 and CAAP 174-1 can achieve this.

5.3.2 New generation helicopters coming into Australia (i.e. Eurocopter EC130, EC135 and AW139) are factory equipped compatible for NVG. This NPRM and associated legislation will allow operators to take advantage of the full capabilities of the aircraft that they are flying to ensure enhanced safety at night.

5.3.3 Some countries have been using NVG for civilian helicopter operations for some years. The FAA has allowed civilian operators (with FAA approval) to use NVG since 1999. It is considered in the USA such a safety benefit that it is now the “norm” for EMS, SAR and Law Enforcement providers to use NVG for operations, with contractors requesting operators and aircraft to be equipped and capable. This NPRM will bring Australia in line with world practice.

5.3.4 Contractors in Australia are currently requesting operators have NVG operational capability. This NPRM will allow operators to comply with contractual requests.

### **5.4 Regulation Impact Statement (RIS)**

5.4.1 The Office of Best Practice Regulation (OBPR) has advised that the CAO may proceed without the preparation of a Regulation Impact Statement. The CAO is intended to establish a 12 month monitored trial of NVG by approved emergency services operators who can meet the safety requirements of the CAO. The CAO places a safety framework around the permitted use of NVG. It is up to an eligible operator to decide whether or not to use NVG and commit to the obligations associated with that. To this extent the CAO is a machinery provision for which a RIS is not required.

RIS Exemption ORR ID 7969.

## 6. Implementation and Review

### 6.1 Implementation

6.1.1 It is planned that the proposed CAO 82.6 and CAAP 174-1 will be made by the CEO once NPRM and NFRM consultative and rule making processes are complete.

6.1.2 Operators wishing to apply for NVG operations prior to the CAO and CAAP being made will not be disadvantaged. An Instrument of Approval based on draft CAO 82.6 is to be made available as an interim measure. Operators are aware that they may be required to make changes to their operational procedures based on the outcome of the NPRM process, however as the content of the CAO and CAAP have been jointly developed and consulted on with industry any such changes should be minimal.

### 6.2 Transition

6.2.1 It is proposed that once CAO 82.6 is made, operators who are using NVG under a previously issued Instrument of Approval (as detailed in 6.1.2) will have 3 month transition period to meet the requirements of CAO 82.6 and once assessed by CASA a new Instrument of Approval will be issued.

6.2.3 The purpose of the implementation/transition phase is to provide NVG operators with education and training programs, development and approval of necessary (operational) manuals, adjustment of delegations/authorisations, development and approval of procedures and the application of the new rules.

### 6.3 Monitoring and Review

6.3.1 Quarterly meetings will be conducted during the 12 month trial period in Sydney with affected stakeholders invited to attend to review the legislation, NVG operations, technology development, overseas developments and any accident/incident where NVG has been found to be a contributing factor. Based on the outcomes of these meetings, issues will be recorded and if required recommendations made to the delegate to amend CAO 82.6 and/or CAAP 174-1.

6.3.2 At the end of the 12 month period a joint review by CASA and affected stakeholders will occur. A decision will be made to either:

- Extend the trial to further refine and develop legislation; or
- Transfer the legislation into CASR Part 133.

6.3.3 Thereafter, following the commencement of the regulations, a monitoring and part implementation review will be conducted.

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# NPRM 0705OS Response Form

## USE OF NIGHT VISION GOGGLES (NVG) IN HELICOPTER OPERATIONS – PROPOSED CAO 82.6

**Please complete your response by 16 July 2007  
and return it by one of the following means:**

**Online (preferred method\*)** [rrp.casa.gov.au/respond](http://rrp.casa.gov.au/respond)

**Fax** 1800 653 897 (free call in Australia)

**Post (no stamp required in Australia)**  
CASA Regulatory Development Management Branch  
Reply Paid 2005, Canberra ACT 2601, Australia

**E-mail (use the response format in this NPRM)**  
[nprm0705os@casa.gov.au](mailto:nprm0705os@casa.gov.au)

\* A web-based online response form is offered as an alternative to the printed form in this NPRM. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type [rrp.casa.gov.au/respond](http://rrp.casa.gov.au/respond) into your web browser and follow the links for this NPRM.

### Your Details

Please provide relevant information below and indicate your acceptance or otherwise of the proposal presented in this Notice of Proposed Rule Making by ticking [✓] the appropriate boxes.

Your name: \_\_\_\_\_ ARN\* (if known): \_\_\_\_\_

Organisation: \_\_\_\_\_ ARN\* (if known): \_\_\_\_\_

Address: \_\_\_\_\_

\*Aviation Reference Number, usually your CASA-issued licence or certificate number

Your telephone number (optional): \_\_\_\_\_ (to enable the Project Manager to contact you as necessary)

Do you consent to have your name published as a respondent to this NPRM? YES [ ] NO [ ]

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

### Your affiliation (who you are representing):

Private       Industry       Airline       Union       Government       Other  
Association

The name/title of your affiliation (where relevant) \_\_\_\_\_

### Your involvement in the aviation industry:

Consumer       Pilot or Flight       Ground or       Product or       Aircraft Owner       Operator  
Crew      Support Staff      Service      Provider

Your satisfaction with the adequacy of existing legislation/requirement in relation to this topic (if any):

Very satisfied       Satisfied       No opinion       Dissatisfied       Very dissatisfied

**Key Change Proposals (refer to NPRM Section 4 and Annex A for details)**

CASA invites you to advise your acceptance or otherwise of the key proposals contained in this NPRM by indicating your preferences and comments below and overleaf:

***NVG use as primary means of terrain avoidance will require an Instrument of Approval issued by CASA and will only be available to AOC holders***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

***NVG use will initially be limited to specific types of helicopter operations***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

***Standards developed in relation to initial, recurrency and line training for flight crews for the use of NVG***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

***Standards developed in relation to NVG qualifications and licence requirements for operators and flight crew***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

***Standards developed in relation to aircraft and NVG equipment airworthiness requirements for NVG***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

***CAR 215 direction provided for minimum Operations Manual content***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

***Standards developed for the operational use of NVG***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

***Exemptions granted for specific operations in relation to minimum height for V.F.R. flights at night (CAR174B)***

- acceptable without any changes
- acceptable but would be improved if changes were made
- not acceptable but would be acceptable if changes were made
- not acceptable under any circumstances
- no opinion

Additional explanation (and, if appropriate, an estimate of any consequential impacts including costs): \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_









Please forward your response to CASA by  
*16 July 2007*  
by one of the following means:

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Additional information is available from:

**Yvette Lutze / John Beasy, CAO 82.6 Project Leaders**

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