





# **AU-STS 6: Applicant Response**

# **BVLOS Operations in Remote Australian Airspace (below 400 ft AGL)**

**Version** 1.0 - August 2021

Approval Tier Three

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#### Reference material

Document type	Title
Publication	JARUS SORA version 2
Regulation	Part 101 Manual of Standards
Guidance Material	Standard Scenario Application and Documents – Guidance Material

### **Forms**

Form N°.	Title
Form 101-09	Application for RPA flight authorisation

# **Revision history**

Revisions to this manual are recorded below in order of most recent first.

Version N°.	Date	Parts / sections	Details
1.0	August 2021	All	First issue

# **Glossary**

# Acronyms and abbreviations

Acronym / abbreviation	Description
ABS	Australian Bureau of Statistics
ADS-B	Automatic Dependent Surveillance-Broadcast
AEC	Airspace Encounter Category
AGL	Above Ground Level
AMSL	Above Mean Sea Level
ARC	Air Risk Class
ATC	Air Traffic Control
AU-STS	Australian Standard Scenario
BVLOS	Beyond Visual Line of Sight
CASA	Civil Aviation Safety Authority
C2	Command and Control
C3	Command, Control and Communication Link
CONOPS	Concept of Operations
CRM	Crew Resource Management

Acronym / abbreviation	Description
CTR / CTZ	Control Zone
DAA	Detect and Avoid
EMS	Emergency and Medical Service
ERP	Emergency Response Plan
EVLOS	Extended Visual Line of Sight
FLARM	Flight and Alarm
ft	Feet
GNSS	Global Navigation Satellite System
GPS	Global Positioning System
НМІ	Human Machine Interface
ICAO	International Civil Aviation Organisation
J	Joules
JARUS	Joint Authorities for Rulemaking of Unmanned Systems
kJ	Kilojoules
km	Kilometre
LTE	Long Term Evolution. LTE is a 4G wireless communications standard.
m	Metres
MC	Maintenance Controller
MTOM	Maximum Take-off Mass
NM	Nautical Miles
OEM	Original Equipment Manufacturer
OSO	Operational Safety Objective
Part 101 MOS	Part 101 (Unmanned Aircraft and Rockets) Manual of Standards 2019
ReOC	RPA Operator's Certificate
RP	Remote Pilot
RPA	Remotely Piloted Aircraft
RPAS	Remotely Piloted Aircraft Systems
RPIC	Remote Pilot in Command
RPT	Regular Public Transport
SAIL	Specific Assurance and Integrity Level
SORA	Specific Operation Risk Assessment
TMPR	Tactical Mitigation Performance Requirements
VMC	Visual Meteorological Conditions
VLOS	Visual Line of Sight

### **Definitions**

Term	Definition
Active Participants	Those persons directly involved with the operation of the RPA or fully aware that the RPA operation is being conducted near them. They are fully aware of the risks involved with the RPA operation and have accepted these risks.
	Active participants are informed on and able to follow relevant effective emergency procedures and / or contingency plans.
Atypical Airspace	Airspace where the unmitigated risk of an encounter between an RPA and a conventionally piloted aircraft is acceptably low.  This can be:
	<ul> <li>restricted airspace (e.g. segregated / restricted areas)</li> <li>airspace designated 'atypical' by the competent authority</li> <li>airspace where conventionally piloted aircraft do not routinely fly (e.g. within 120 m from buildings)</li> <li>airspace characterisation where the collision risk between an RPA and conventionally piloted aircraft is not greater than the target level of safety of 1E-7 Mid Air Collisions (MAC) per flight hour.</li> </ul>
Beyond Visual Line of Sight (BVLOS)	An RPAS operation whereby the RPIC is not able to maintain at all times visual unaided contact with the aircraft.
Dangerous Goods	Articles or substances listed as dangerous goods in the ICAO Technical Instructions, or which are classified according to those instructions.
Extended Visual Line of Sight (EVLOS)	An RPAS operation whereby the RPIC maintains an uninterrupted situational awareness of the airspace and ground environment in which the RPA operation is being conducted via visual airspace surveillance through one or more human observers, possibly aided by technology means.
Improbable	For the purpose of this assessment, this refers to a 'qualitative' interpretation i.e. "unlikely to occur in each RPAS during its total life, but which may occur several times when considering the total operational life of a number of RPAS of this type."
Probable	For the purpose of this assessment, this refers to a 'qualitative' interpretation i.e. "anticipated to occur one or more times during the entire system / operational life of an item."

# Remote Australian Airspace standard scenario - Guidance material

Term	Definition
Relevant Airspace	Areas and airspace within the no-fly zone of an aerodrome or helicopter landing site, as defined in of the Part 101 MOS.
	In general terms, for an aerodrome these areas include:
	<ul> <li>areas and airspace within 3 NM of the movement area of the aerodrome, where the movement area includes areas used for the surface movement of conventionally piloted aircraft, manoeuvring areas and aprons</li> <li>the approach and departure paths of the aerodrome.</li> </ul>
	For a helicopter landing site, this is the area inside a cylinder with a 1.5 NM diameter and 400 ft height centred on the helicopter landing site.
Relevant Event	Occurs when a conventionally piloted aircraft is within relevant airspace, including when an aircraft is landing, taking off, or manoeuvring on the movement area, of the aerodrome or helicopter landing site.
Remote Australian Airspace	Airspace defined by CASA as being located in areas that have very low population density and negligible air activity so that these areas can be considered suitable for consideration for RPA BVLOS operations utilising mitigations agreed with CASA.
Remote Pilot in Command (RPIC)	The RPIC is responsible for the flight and all actions conducted by the operating crew in support of the flight. For BVLOS operations, the RPIC must hold an IREX or CASA approved BVLOS examination pass. Under Exemption CASA EX46/21, the RPIC does not have to be the RP controlling the RPA.
Shielded Operations	An operation of an RPA within a specified distance, typically 120 metres from, and below the top of, a natural or man-made object.
Sparsely Populated Area	For this scenario, an area with:  • average population density of < 10 persons / km², and  • no towns or settlements of > 100 dwellings.
Viewshed Analysis	A line-of-sight analysis for mapping the visibility of a place or area from a selected location.
Visual Line of Sight (VLOS)	An RPA is being operated within the visual line of sight of the person operating the aircraft if the person can continually see, orient and navigate the aircraft to meet the person's separation and collision avoidance responsibilities, with or without corrective lenses, but without the use of binoculars, a telescope or other similar device.

#### 1 Introduction

For this standard scenario (AU-STS 6), CASA has undertaken a SORA assessment for a predefined Concept of Operations (CONOPs) for a Beyond Visual Line of Sight (BVLOS) < 400 ft in remote Australian airspace with a sparsely populated ground environment.

While not an exhaustive list, the use-cases that fall within this scenario might include large-scale rural surveys, agriculture, and environmental monitoring in remote Australian airspace.

CASA has made determinations on the likely mitigations that an operator must provide evidence to demonstrate the safety gain is achieved to an acceptable degree. If these mitigations are present, CASA has determined the outcome of the SORA assessment to be a SAIL II. For this specific type of operation, CASA has additionally provided guidance on the necessary documentation needed to show compliance with the mandatory requirements to demonstrate a reasonable safety case.

The SORA is clear that the only way to undertake BVLOS operations without some form of 'detect and avoid' is to undertake the operation in "atypical airspace," which is airspace that is so devoid of aircraft that the chance of randomly encountering another aircraft is so low that it would meet any target level of safety without additional mitigation. This does not mean that CASA will not require any mitigation for air risk in atypical airspace, but is rather an indication of the unmitigated risk in the airspace under consideration. In remote areas of Australia, away from aerodromes, flight routes and population centres, it is likely that this requirement is met by virtue of the remoteness of the location. However, without quantitative data, it is not possible to determine whether the airspace meets the atypical definition.

To help manage this, CASA has created a set of airspace encounter categories (AEC) that are specific to remote, uncontrolled airspace in Australia which CASA believes has such a low density of airspace users that it would practically be considered "atypical".

Due to the inability to determine quantitatively that the airspace is atypical, CASA requires an applicant to demonstrate additional strategic mitigations to reduce the risk of an encounter with a conventionally piloted aircraft to an acceptable level.

The following assumptions have been made in the development of this scenario:

- (1) The RPA(s) will not be fitted with a DAA system.
- (2) No RPA Traffic Management system will be in operation.
- (3) RPA to RPA conflicts are not considered.
- (4) A minimum of a 1:1 buffer will be applied to the operation.
- (5) The operator will have an Emergency Response Plan (ERP).

Before proceeding with the BVLOS Standard Scenario Application for BVLOS Operations in remote Australian airspace with a sparsely populated ground environment (AU-STS 6), the applicant should refer to the Standard Scenario Application and Documents – Guidance Material.

Although not mandatory, it may also assist to be familiar with the basic SORA concepts and terminology. The SORA package can be downloaded from the JARUS website.

This STS has not been endorsed by JARUS and is applicable to BVLOS operations in Australian airspace only.

# 2 Scope

This document is intended to be used as part of the safety case application for a BVLOS approval to conduct BVLOS operations < 400 ft AGL in remote Australian airspace with a sparsely populated ground environment standard scenario.

The safety case assessment has two distinct phases:

- (1) The development of the CONOPS and ensuring that the planned operation complies with this standard scenario. If the CONOPS does not meet the requirements of the standard scenario, there is no benefit in moving on to the second phase.
- (2) Development of the procedures and documentation to support the proposed operation.

Figures 1 and 2 below provide a visual overview of the ground and airspace attributes for RPAS operations covered within this scenario. These are explained in further detail in Table 1 below.

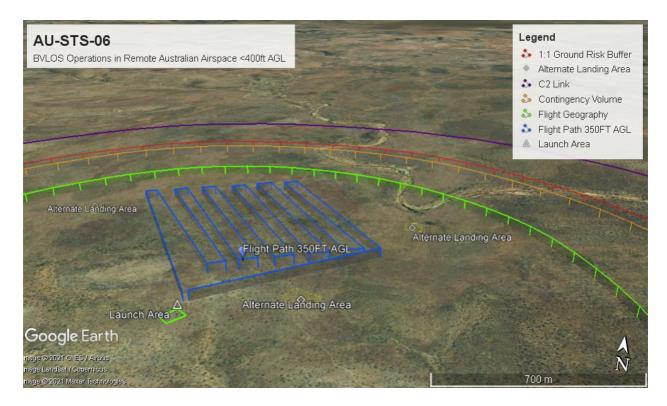


Figure 1: Attributes of AU-STS 6

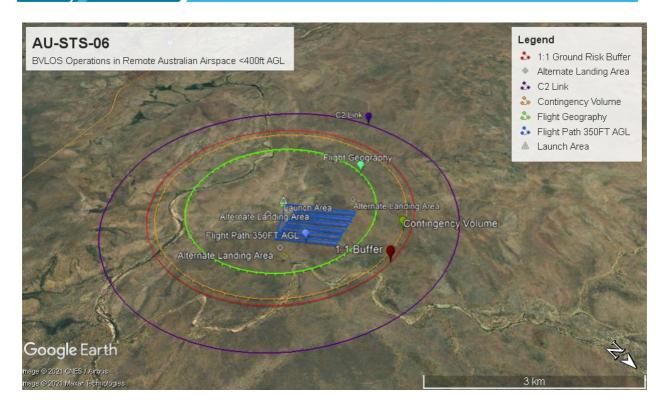


Figure 2: Attributes of AU-STS 6

After reviewing the following information, if the decision is to proceed with an application, review and complete the following sections to build a safety case.

#### 2.1 **Standard Scenario Characterisation and Provisions**

Table 1: Summary of CONOPS Assumptions for BVLOS AU-STS 6

RPA operations < 400 ft	- Remote Australian Airspace
Ground risk characterist	ic – Sparsely Populated
Geographic area – Austr	alia
Operational characterisa	tion (scope and limitations)
Level of human intervention	<ul> <li>No autonomous¹ operations: the remote pilot will always be able to intervene during normal operations</li> <li>The remote pilot will only operate one RPA at a time</li> <li>Handover of control of the RPA from 1 pilot to another will be permitted</li> </ul>
Range limit from remote flight crew	<ul> <li>RPAS is operated at a maximum distance of 80% of OEM stated or proven C2 link range from the controller</li> </ul>
Overflown areas	Sparsely Populated Area
RPAS limitations	<ul> <li>Max. characteristic dimension (e.g. wingspan or rotor diameter / area): 3 m</li> <li>Typical kinetic energy up to 34 kJ</li> </ul>
Flight height limit (AGL)	• < 400 ft AGL
Airspace	<ul> <li>Class G</li> <li>outside of the nominal 'J curve'</li> <li>Not within:</li> <li>5 NM of an aerodrome (assuming the RPA is operating BVLOS at this boundary)</li> <li>Danger areas, or other promulgated areas (such as those specified in NOTAM), associated with flying activities including flight training and military flying</li> <li>10 NM of the aerodrome when RPT traffic is utilising an aerodrome</li> <li>the vicinity of Instrument Approach Procedures (IAP); and</li> <li>Airspace encompassing areas of anticipated higher airspace utilisation, such as:         <ul> <li>fly-ins / air shows</li> <li>gliding, balloon operations etc. (incl. competition -usually notified by NOTAM)</li> <li>areas regularly involving scenic flights (i.e. Uluru, Bungle Bungle Range, Lake Eyre, etc)</li> <li>areas of high aerial work activities (e.g. agricultural spraying, mustering, Low Level survey / inspection).</li> </ul> </li> </ul>
Other	<ul> <li>No items may be dropped which cause a hazard</li> <li>No dangerous goods may be carried unless that item forms part of the RPA itself (e.g. LiPo battery)</li> </ul>
Weather	5 km visibility (forecast)

<sup>&</sup>lt;sup>1</sup> An operation during which an unmanned aircraft operates without the remote pilot being able to intervene.

- 1,000 ft vertically clear of actual cloud base
- Not operated within 5 km of thunderstorms or showers

#### **Operational mitigations**

#### Operational Volume

The operational volume comprises the flight geography and the contingency volume.

To determine the operational volume, the applicant must consider the position-keeping capabilities of the RPA in 4D space (latitude, longitude, height, and time).

In particular, the accuracy of the navigation solution, the flight technical error of the RPA, as well as the path definition error (e.g. map error) and latencies will be considered and addressed in this determination.

If the RPAS leaves the operational volume, emergency procedures must be activated immediately.

#### Ground Risk

For this standard scenario, sparsely populated areas are defined as:

- average population density of < 10 persons / km², and</li>
- no towns or settlements of > 100 dwellings.

The applicant must demonstrate by on-site survey and / or analysis of imagery that an average population density of < 10 persons / km<sup>2</sup> exists within the proposed operational volume during the proposed times / days of operation.

The applicant may wish to utilise the Australian Bureau of Statistics (ABS) data, to determine the population density of an area.

A ground risk buffer must be established to protect third parties on the ground outside the operational volume.

The operational volume and the ground risk buffer must be in:

sparsely populated environment.

The applicant must have documented practices and procedures that detail how BVLOS operations are planned and conducted, including:

- how overflight of identified dwellings is avoided
- identification of any critical infrastructure or sensitive areas (e.g. environmentally sensitive)
- how overflight of roads / vehicles is avoided
- if any overflight of roads are proposed, how this would be performed to meet an acceptable level of safety, including consideration to:
  - road usage, traffic movements and expected traffic volumes
  - transiting over the road perpendicular to the direction of the road, and
  - transiting over the road at a height which, in the event of an emergency or failure of the RPA, the RPA is able to safely avoid the road (i.e. not posing a hazard).

#### Air Risk

Australia has unique geographical characteristics whereby there are significant portions of inland areas which would be considered wholly rural and remote. The SORA does not currently specify this delineation explicitly. CASA believes there is a region of very low risk airspace in remote Australia that is so distinct from currently defined SORA AEC-5 and AEC-10 classifications that they would exist in separate AECs in a "low risk" ARC-b categorisation. Australia has categorised two "remote Australian airspace" as:

- AEC-13 BVLOS in Remote Australian Airspace < 400 ft AGL, and</li>
- AEC-14 BVLOS in Remote Australian Airspace > 400 ft AGL < 5000 ft AMSL

To obtain an AEC-13- BVLOS in Remote Australian Airspace < 400 ft AGL the operation must be:

- in Class G airspace < 400 ft AGL, and
- outside of the nominal 'J curve', and
- in airspace that is not within 5 NM of an aerodrome (assuming the RPA is operating BVLOS at this boundary), and
- not within the vicinity of Instrument Approach Procedures (IAP), and
- airspace not encompassing areas of anticipated higher airspace utilisation, such as:
  - coastal regions down to 500 ft ,1NM out from coastline (if applicable)
  - fly-ins / air shows, or
  - gliding, balloon operations etc. (incl. competition usually notified by NOTAM), or
  - areas regularly involving scenic flights (i.e. Uluru, Bungle Bungle Range, Lake Eyre etc), or
  - areas of high aerial work activities (e.g. agricultural spraying, mustering, low-level survey / inspection).

Additionally, the applicant must demonstrate that when RPT traffic is utilising an aerodrome, RPA cannot operate within 10 NM of the aerodrome.

#### **Operator Provisions**

#### ReOC holder

A CASA ReOC and its associated Operations Manual is expected to already cover a substantial amount of the procedural / organisational mitigations required by SORA. The operator must, however, develop and document the procedures and processes required to support the specific BVLOS operation. Where required, the operator may need to demonstrate the efficacy of those procedures to CASA.

#### RPA operations

The applicant must document the following procedures or policies in their Operations Manual:

- task specific BVLOS operational procedures
- handover procedures from BVLOS to EVLOS / VLOS and vice versa (if required)
- handover procedures between RPs (if required)
- · task specific RPA operational limitations
- task specific Emergency Response Plan (ERP)
- limitations of the external systems supporting RPA for safe operations
- weather / environmental conditions required for a safe operation

### how the remote crew can declare themselves fit to operate before conducting any operation how the remote crew is assessed as current and competent an up-to-date list of remote crew members authorised to carry out BVLOS operations. The adequacy of the contingency and emergency procedures must be proven through: dedicated flight tests simulations, provided the representativeness of the simulation means is proven for the intended purpose with positive results, or any other means acceptable to CASA. A template of BVLOS procedures and sections, which may be included in an Operations Manual, is provided in Appendix A of Standard Scenario Application and Documents - Guidance Material. All RPAs used for BVLOS operations must be maintained, as a minimum, in **RPAS** accordance with the OEM documentation. maintenance Maintenance records and technical logs for all RPAs to be used for BVLOS operations must be kept in accordance with the Part 101 MOS regardless of size or weight. External If the applicant relies on any external services, such as LTE (4G / 5G), Internet Services services etc., the applicant must demonstrate that the performance and availability of the service is adequate for the intended operation. The applicant must document the effects of any degradation or loss of services on the safety of flight and how these will be managed (e.g. operations cease, VLOS / EVLOS only etc.). If the provision of the external service requires specific contracts or arrangements to be entered into, roles and responsibilities between the applicant and the external service provider must be defined. If the applicant is using a standard commercial contract, this is not required (e.g. a mobile phone / data / internet contract). Remote crew The applicant must document, as a minimum, the following training procedures or policies in their Operations Manual: theoretical training syllabus mission planning syllabus practical training syllabus BVLOS check flight profile and assessment criteria approved BVLOS trainers' qualifications and experience requirements internal training syllabus for BVLOS trainers ERP training syllabus. For all BVLOS operations, the remote pilot in command must hold a pass in the IREX or CASA approved examination (CASR 101.300(4)(a)). All remote pilots involved in a BVLOS operation must hold an appropriate aeronautical radio qualification. At a minimum, all remote pilots in command must have at least 20 hours' RPA experience with at least two hours' experience on the type and model of RPA.

# Remote Australian Airspace standard scenario - Guidance material

	Applicants should assess whether higher experience levels are required based on the complexity of their RPAS.
	A record of all relevant qualifications, experience and / or training completed by the remote crew will be established and kept up to date.
	A template outlining BVLOS training elements, which may be included in an Operations Manual, is provided in Appendix B of Standard Scenario Application and Documents – Guidance Material.
General	In their Operations Manual, the applicant must document how critical parameters are to be monitored. As a minimum, the applicant must document how:
	<ul> <li>RPA position, height or altitude, ground speed or airspeed and tracking are monitored</li> <li>RPA position reference areas and dwellings to be avoided</li> <li>how the RPA height will be monitored with reference to terrain</li> <li>the required lateral spacing</li> <li>RPA energy status (fuel, batteries etc.)</li> <li>status of critical functions and systems; as a minimum, for services based on RF signals (e.g. C2 Link, GNSS etc.) means must be provided to monitor the adequate performance and triggering an alert if level is becoming too low</li> <li>detecting interference with C2 or other RPA systems.</li> </ul>
Human Machine Interface	The applicant must conduct an evaluation of the RPAS considering and addressing human factors to determine the HMI is appropriate for the BVLOS operations. A HMI assessment proforma is provided in Appendix D of Standard Scenario Application and Documents - Guidance Material. The applicant can either use the template provided as guidance, or put forth an alternative methodology.
Command, Control links	Any RPA used for BVLOS operations must comply with the appropriate requirements for radio equipment and the use of RF spectrum.
(C2) and communication	In the Operations Manual, the applicant must document the maximum operating range of the RPA from the control station. This can be either 80% of the OEM declared operating range, or a maximum operating range proven by flight operations.
	In the Operations Manual, the applicant must document how to conduct a visibility / viewshed analysis to demonstrate that the C2 and communication links will not be adversely affected by terrain i.e. Electronic line of sight will be maintained throughout the operating area.
	A copy of the analysis must be attached to all operational releases and provided to CASA as part of any application.
	The remote pilot must have a reliable and continuous means of two-way radio communication with other air users or ATC if required. The RPICs mobile / satellite phone number and frequency being monitored during flight must be published in the NOTAM for RPA BVLOS operations to allow coordination with conventionally piloted aircraft and another RPA operator.

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Strategic air mitigations	CASA has determined that for this AU-STS, as it is low-risk remote Australian airspace, if the following strategic mitigations are added, this will reduce the probability of an encounter to a point where it is equivalent to "atypical airspace":  • Stakeholder engagement with other airspace users within the vicinity of the proposed operational volume.  • NOTAM issued for the operational volume detailing the operational context and contact information for other airspace users.  • Operator to keep records of any movement / radio logs within vicinity of the approved area while operating the RPA. This recorded evidence must be part of the evidentiary matter to assist CASA with aerial movement data for remote areas of Australia.
Tactical mitigation	The RPA is being operated in atypical airspace so does not have to meet the normal 'see and avoid' requirements.
RPA Conspicuity	The applicant should consider methods to enhance airspace situational awareness, as well as the detectability and conspicuity of the RPA, for example:  • technologies for electronic detection of air traffic (e.g. ADS-B IN, web-based real time tracking services)  • RPA is fitted with suitable high intensity anti-collision lighting (such as strobes)  • RPA is painted using a high visibility colour / contrast paint scheme.
Containment	To ensure a safe recovery from a technical issue involving the RPA, or external system supporting the operation, the applicant should assess and describe the effects of the following probable failures:  • Ability of RPA to continue to fly or make a safe landing with at least one motor inoperative (i.e. the RPA remains controllable).  • Intermittent or degraded C2 link particularly at the maximum operating range and / or around vertical obstacles.  • Indications, RPA response and crew procedures and actions in the event of a permanent loss of the C2 link.  • Total or partial failure of the ground control station affecting such systems as electronic displays, video feeds, internet, manual control interfaces etc. caused by software, hardware or power failures.  • Identify any possible single point failures in the RPAS which are critical to the containment of the RPA.  • Navigation system failures, including degradation or total loss of GPS, IMUs, sensors or cameras, that may result in a reduction in navigation accuracy and / or a loss of available navigation modes.  The applicant should then ensure that:  • no probable failure of the RPA or any external system supporting the operation will lead to operation outside of the operational volume  • it will be reasonably expected that a fatality will not occur from any probable failure of the RPA or any external system supporting the operation.  The applicant must then provide a technical assessment that demonstrates, at a minimum:  • design and installation features (independence, separation and redundancy)  • particular risks (e.g. hail ice, snow, electro-magnetic interference etc.)
	<ul> <li>particular risks (e.g. hail, ice, snow, electro-magnetic interference etc.) relevant to the CONOPs.</li> </ul>

# Remote Australian Airspace standard scenario - Guidance material

Additional Notes	VLOS / EVLOS procedures may be utilised to establish the RPA area of operation. Take-off and landing can be conducted either VLOS / EVLOS or BVLOS, provided the operator has suitable documented practices and procedures.
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## 3 Application

The following sections provide applicants with guidance about the minimum information and evidence required to support an application for BVLOS operations according to the standard scenario AU-STS 6.

CASA considers these the minimum requirements for applications under this scenario, and applicants should assess whether higher levels of safety are required based on the complexity of the operation.

### 3.1 Concept of Operations (CONOPs)

The applicant must provide an outline of the proposed concept of operations, including at least:

- proposed activity(ies) to be conducted
- RPAs that will be utilised
- confirmation that the Remote Pilot will only fly one RPA at a time
- minimum crew composition and qualifications
- details of flight operational area including contingency area and 1:1 buffer
- explanations as to how the flight operational area will be conducted in remote
   Australian airspace and have a populations density of less than 10 person / km²
- confirm that the operator has an applicable emergency response plan (ERP) in place.

CONOPS must be attached as a separate document.

#### 3.2 Ground Risk Considerations

For this standard scenario (AU-STS 6), the operational volume and the ground risk buffer must be located in a sparsely populated environment.

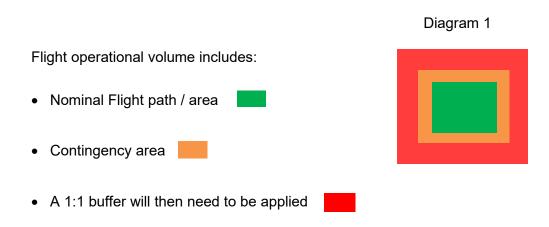
The applicant must have documented practices and procedures that detail how BVLOS operations are planned and conducted including:

- how overflight of identified dwellings is avoided
- identification of any critical infrastructure or sensitive areas (e.g. environmentally sensitive)
- how overflight of roads / vehicles is avoided, and
- If any overflight of roads are proposed, how this would be performed to meet an acceptable level of safety, including consideration to:
  - road usage, traffic movements and expected traffic volumes
  - transiting over the road perpendicular to the direction of the road, and
  - transiting over the road at a height that, in the event of an emergency or failure of the RPA, the RPA is able to safely avoid the road (i.e. not posing a hazard).

The applicant must demonstrate that the area is sparsely populated, the maximum aircraft characteristic dimension is less than three metres, and the typical kinetic energy of the aircraft is < 34 kJ.

**Step 1**: Plan the operation including heights, operational volume and apply a 1:1 buffer. Ensure that the flight route is < 400 ft AGL. The flight area must include an area for an RPA issue called a contingency area.

The operational flight volume must include a volume for the remote pilot to complete contingency actions / procedures within after the RPA enters an undesired state (e.g. an abnormal situation / issue / failure). This volume is between that in which the flight is planned and the buffer, and is known as the contingency volume. This volume provides the RPIC sufficient time to bring the RPA back into a nominal state for any probable malfunctions / failures from which it can return to the normal task or be landed before it reaches the 1:1 buffer. If the RPA reaches the buffer, the RPA must be immediately landed or terminated. The applicant is also required to consider the ability of the RPA to remain within the operational volume, referred to in Step 9 as containment. The requirement of containment is that no probable failure will lead to the RPA flying outside the operational volume and posing a risk to adjacent areas. The applicant should ensure that the size of the contingency volume is sufficient to ensure the RPA is contained within the operational volume for all likely malfunctions / failures, such as reduced navigation performance, loss of C2 etc.



The outcome is that you the applicant will have identified the flight operational volume (nominal flight area and contingency area) and the risk buffer.

**Note:** 1:1 buffer would mean that if the RPA is planned to operate at 100 m height, the ground risk buffer should at least be 100 m. An example of this can be seen in section 3 of Standard Scenario Application and Documents - Guidance Material.

Table 2: 1:1 Buffer

1:1 Buffer		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
The Operations Manual must highlight how operators manage to maintain a 1:1 Buffer including:		
<ul> <li>how settlements and dwellings are to be avoided</li> <li>how the 1:1 buffer will not be adjacent to any open-air gatherings.</li> </ul>		
A geographic data file (e.g. a kml / kmz readable in Google Earth) including:		

1:1 Buffer		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
<ul> <li>RPA Flight heights</li> <li>flight operational volume</li> <li>1:1 Buffer</li> <li>identification of any critical infrastructure or sensitive areas (e.g. environmentally sensitive)</li> <li>avoidance of overflight of roads / vehicles</li> </ul>		
An example of this is in section 3 of Standard Scenario Application and Documents – Guidance Material.		

**Step 2**: Using the identified flight operation area and risk buffer, determine that the number of people in this area will be less than 10 persons / km². Also, identify dwellings and update the flight route to avoid these dwellings. Finally, avoid overflight of any towns or settlements.

Assess the areas bordering the 1:1 buffer and make sure there are no locations where regular large gatherings take place e.g. sporting event, playgrounds etc. If any such areas are identified, documents must present how the operation will take place outside of the times of gatherings. The outcome is an updated KML file or image of the flight area, and 1:1 buffer which shows the population density in the intended area.

**Table 3: Sparsely Populated Area** 

Sparsely Populated Area		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
Demonstrate by on-site survey and / or analysis of imagery that an average population density of < 10 persons / km² exists within the proposed operational volume during the proposed times / days of operation.		
Australian Bureau of Statistics (ABS) data can be utilised to determine the population density of an area.		

**Step 3**: Calculate the kinetic energy of all the RPAs intended for use in this operation. Click on Table 4, which will open an Excel spreadsheet. Items in yellow must be completed. Record the results for each RPA in Table 5.

For an RPA to be used in this standard scenario, it must have the following characteristics:

- max. characteristic dimension (e.g. wingspan or rotor diameter / area): 3 m
- typical kinetic energy: up to 34 kJ.

Any RPAs that exceed these maximums cannot be included in this application. If their use is essential, the applicant must use a different STS, or make a full SORA application.

The outcome of this step is a list of RPAs seeking approval for this operation.

For each category of RPA, the maximum characteristic dimension is determined on:

- FIXED-WING AIRCRAFT / POWERLIFT = wingspan
- MULTICOPTERS = maximum dimension
- ROTORCRAFT = rotor diameter

For the purposes of calculating the typical kinetic energy expected of an RPA, the following formula can be used:

$$KE = \frac{1}{2} \ m \ V^2$$

#### Where:

- KE is the typical kinetic energy (J).
- *m* is the mass of the RPA (kg) the Maximum Take-off Mass (MTOM) of the RPA is to be used in this case.
- V is the velocity of the RPA (m / s) the maximum cruise velocity of the RPA is to be used in this case.

**Table 4: Determination of RPA Kinetic Energy** 

Determination of RPA Kinetic Energy				
	Kinetic Energy			
	Mass	20	kg	
	Maximum			
	dimension		m	
	Aircraft Type			
	Make			
	Model			
	Speed to use	Cruise		
	Speed*	10	m/s	
	KE	1000	J	

Table 5: RPA Characteristics and Typical Kinetic Energy

RPA Characteristics and Typical Kinetic Energy		
RPA Type Characteristic Dimension Kinetic Energy (kJ) (m)		

#### 3.3 Air Risk Considerations

**Step 4:** Review the airspace in and around the flight operation area and ensure the following:

- Flight Operational area is within class G airspace
- Outside of the nominal 'J curve'
- Flight Operational area is not within 5 NM of an aerodrome
- When RPT traffic is utilising an aerodrome, RPA cannot operate within 10 NM of the aerodrome
- It is not within the vicinity of Instrument Approach Procedures (IAP), and
- Airspace not encompassing areas of anticipated higher airspace utilisation, such as:
  - fly-ins / air shows,
  - gliding, balloon operations etc. (incl. competition usually notified by NOTAM),
  - Areas regularly involving scenic flights (i.e. Uluru, Bungle Bungle Range, Lake Eyre etc), or
  - areas of high aerial work activities (e.g. agricultural spraying, mustering, Low Level survey / inspection).

The outcome of this step is to provide an image, chart, screenshots or documentation that shows the operation is within the scope of this standard scenario.

An example of this is shown in section 3 of Standard Scenario Application and Documents – Guidance Material.

**Table 6: Air Risk Considerations** 

Air Risk Considerations		
Evidence Required	Evidence Location (please include page number, section, appendix or attached file name)	
Provide an image, chart or screenshots that show both the operation area and 1:1 buffer are within:  Class G Airspace  Outside of the nominal J-Curve		
<ul> <li>and not within:</li> <li>5 NM of an aerodrome</li> <li>the vicinity of Instrument Approach Procedures (AIP).</li> </ul>		
An analysis of the airspace for both the flight operational area and surrounding area must be provided. It will need to include areas that will have higher airspace utilisation and how flight operations will be managed and avoided at that time. Areas must include:		
<ul> <li>fly-ins / air shows, or</li> <li>gliding, balloon operations etc. (incl. competition – usually notified by NOTAM), or</li> </ul>		

Air Risk Considerations		
Evidence Required	Evidence Location (please include page number, section, appendix or attached file name)	
<ul> <li>areas regularly involving scenic flights         (i.e. Uluru, Bungle Bungle Range, Lake Eyre etc), or</li> <li>areas of high aerial work activities (e.g. agricultural spraying, mustering, Low Level survey/inspection), or</li> <li>whether RPT traffic is utilising an aerodrome within 10 NM of flight operational area.</li> </ul>		

**Step 5:** CASA has determined that for this AU-STS, if the following strategic mitigations are added to items required in Step 4, this will reduce the probability of an air encounter to a point where it is equivalent to "atypical airspace":

- Stakeholder engagement with other airspace users within the vicinity of the proposed operational volume.
- NOTAM issued for the operational volume detailing the operational context and contact information for other airspace users.
- Operator to keep records of any movement / radio logs within vicinity of the approved area while operating the RPA. This recorded evidence must be part of the evidentiary matter to assist CASA with aerial movement data for remote areas of Australia.

**Table 7: Air Risk Mitigations** 

Air Risk Mitigations		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
Complete a stakeholder engagement plan (refer to Standard Scenario Application and Documents – Guidance Material) to ensure understanding of the flight operational and sounding airspace; this must be included in the submission.		
BVLOS operational procedures must be added, showing:		
the NOTAM issued		
carriage of a radio		
procedures for keeping records of any movement / radio logs within the vicinity of the approved area while operating the RPA.		

Although not required as part of this standard scenario, the applicant is encouraged to adopt any mechanism that may further reduce the risk of a breakdown of safe separation, such as:

- electronic visibility (i.e. ADS-B, FLARM, transponder)
- lighting, strobes
- high visibility paint.

#### 3.4 Confirmation

**Step 6:** The previous steps assessed the proposed BVLOS operation against this standard scenario.

If able to answer YES to the following questions with supporting evidence, the applicant should complete the next three sections and provide supporting documents.

Table 8: AU-STS 6 checkpoint

Check Points	Yes	No
Is the proposed operation < 400ft AGL and in remote Australian airspace?		
Does the proposed flight plan route avoid all dwellings?		
Is a 1:1 ground buffer applied?		
Is the operational area and 1:1 buffer sparsely populated?		
Are the RPA characteristics less than 3 m and kinetic energy less than 34 kJ?		

If NO to any of the questions above, the applicant will need to either:

- amend the planned operations to fit the operational characteristics of this standard scenario
- check the planned operations against a difference standard scenario, or
- complete a full BVLOS SORA application. More information on this process can be obtained from <a href="mailto:rpas@casa.gov.au">rpas@casa.gov.au</a>.

## 4 Additional Supporting Materials

### 4.1 Operational Procedures

**Step 7**: Provide the following operational procedures and documentation:

- (1) An updated Operations Manual for BVLOS operations, including BVLOS procedures, training and record keeping.
- (2) An Emergency Response Plan.
- (3) A completed HMI assessment of all RPAs and GCS.
- (4) A completed stakeholder engagement plan for aerodromes.

To assist in developing these documents, examples are provided in Standard Scenario Application and Documents – Guidance Material.

### 4.2 Additional Mitigations

**Step 8:** Document additional mitigations and provide references for any evidence provided in support for the application. This is divided into three sections, and all must be completed:

- Operator Provisions
- Training Provisions
- Technical Provisions.

The outcome of this step is that the applicant will have developed a safety case in support of the application.

Table 9: Additional mitigation - Operator provisions

Operator Provision		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
Chief pilot record-keeping must be updated to include items for BVLOS in accordance with the Part 101 MOS, including:		
<ul><li>RPAS operational release</li><li>RPAS operational log</li><li>Remote Pilot log.</li></ul>		
A list of remote crew members authorised to carry out BVLOS operations, which must be current.		
Schedule 1 must be current and also list RPAs authorised for this BVLOS standard scenario. Refer to Standard Scenario Application and Documents – Guidance Material.		
Provide provisions or policy in the Operations Manual defining how the remote crew can		

Operator Provision		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
declare themselves fit to operate before conducting any operation.		
Provide documented procedures for accepting a new RPA into BVLOS operational use. Refer to Standard Scenario Application and Documents – Guidance Material.		
Minimum of OEM pre- / post-flight checks documented or referenced in Operations Manual.		
Operational procedures for BVLOS which cover:		
Radio line of sight viewshed analysis or C2 electronic LOS for the operating area.		
Record of ERP validation (tabletop exercise).		

Table 10: Additional mitigations - Training

Training		
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)	
Type training including the acceptance of RPAs into operation (product inspection / conformity) to be added to the Operations Procedures for all RPA that will be utilised in this standard scenario.		
ERP training syllabus must be available. An example is provided in Appendix B of Standard Scenario Application and Documents – Guidance Material.		
A record of internal ERP training completed by the relevant staff must be established and kept up to date; Training records must be kept in accordance with the Part 101 MOS.		
All RPs hold RePL with appropriate RPA operating privileges (Category / Weight Class).		

Training	
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)
Training and procedures for multi crew operations must be documented in Operations Manual.	
Operations Manual documents training and for operation of flight critical support equipment.	

Table 11: Operational mitigations – Technical

Technical	
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)
Demonstrate the RPA will be operated within 80% of the specified OEM range, and determine the RF spectrum usage and environmental conditions for C3 links are adequate to safely conduct the intended operation including:	
<ul> <li>detailed procedures in Operations         Manual</li> <li>RPA range is listed in Schedule 1 of         Operations Manual.</li> </ul>	
The applicant may also illustrate expected RPA operating range in the geographic data file (readable in Google Earth).	
Show that all RPAs used for BVLOS operations will be maintained in accordance with the OEM documentation.	
Maintenance records and technical logs for all RPAs to be used for BVLOS operations must be kept in accordance with the Part 101 MOS regardless of size or weight.	
If the RPA is to be operated in the vicinity of high intensity radio transmissions or similar, the applicant must detail how RPA operations will be safely conducted within this environment.	
A self-declared HMI assessment is attached as part of this submission. It includes equipment that has been reviewed and considered fit for purpose. HMI assessment completed in accordance with Appendix D Standard Scenario Application and Procedures – Guidance Material.	

Technical	
Evidence Required	Evidence Location (include page number, section, appendix or attached file name)
If required, how external services are used and assured must be documented in the Operations Manual.	
Provide maintenance procedures for any flight critical support equipment.	
In the Operations Manual, document how weather limits are defined and how these are monitored.	

#### 4.3 RPA Containment

**Step 9:** To ensure a safe recovery from a technical issue involving the RPA, or external system supporting the operation, the applicant should assess and describe the effects of the following probable failures:

- (1) Ability of RPA to continue to fly or make a safe landing with at least one motor inoperative (i.e. the RPA remains controllable) if applicable.
- (2) Intermittent or degraded C2 link particularly at the maximum operating range and / or around vertical obstacles.
- (3) Indications, RPA response and crew procedures / actions in the event of a permanent loss of the C2 link.
- (4) Total or partial failure of the ground control station affecting such systems as electronic displays, video feeds, internet, manual control interfaces etc. caused by software, hardware or power failures.
- (5) Identify any possible single point failures in the RPAS which are critical to the containment of the RPA.
- (6) Navigation system failures, including degradation or total loss of GPS, IMUs, sensors or cameras, that may result in a reduction in navigation accuracy and / or a loss of available navigation modes.

Outcome: Provide an analysis of the RPAS which demonstrates that:

- no probable failure of the RPA or any external system supporting the operation will lead to operation outside of the flight operational area and 1:1 buffer
- it will be reasonably expected that a fatality will not occur from any probable failure of the RPA or any external system supporting the operation.

Attach supporting evidence and documentation.

#### **Submitting an Application** 5

The completed BVLOS application package should include:

- completed application for RPA flight authorisation CASA Form 101-09.
- (2) completed AU-STS 6 Applicant Response document with all supporting attachments including KML files, maps, images, analysis, ERP plans, HMI Assessments and stakeholder engagements, and
- (3) updated CASA Operations Manual Suite.

The completed BVLOS application including all supporting documentation should be submitted to <a href="mailto:rpas@casa.gov.au">rpas@casa.gov.au</a>. If the total file size exceeds 18 MB, contact the RPAS Team first to make alternative arrangements for submitting the application.

On receipt of a completed application, CASA will calculate and issue an estimate of the cost to process the application. The estimate must be paid before any assessment can be undertaken.

Due to the high volumes of BVLOS applications submitted to CASA, ensure completed applications are lodged well in advance of the operation's proposed start date.