

## **ANNEX B**

**Consultation response to  
Discussion Paper - DP 12120S - AOC  
requirements for domestic cargo transport  
services in small aeroplanes and rotorcraft**

### **A.1.1 Comment 1 – Not economical**

Respondent stated: Full AOC is not economical for small operators engaged in cargo-only flights.

#### *A.1.1.1 CASA Response*

CASA agrees. The small scale of the operations and the absence of a passenger component would make the full weight of an AOC management structure disproportionate to the risk elements that require mitigation by regulation.

#### *A.1.1.2 Disposition*

CASA proposes an operator registration model that will address the safety issues without a full Part 119 management structure.

### **A.1.2 Comment 2 – AOC not required**

Respondent stated that no AOC should be required for carriage of cargo only.

#### *A.1.2.1 CASA Response*

CASA agrees. A reduced AOC will still involve set-up costs and management structures that provide little safety benefit in a small aircraft cargo type operation.

#### *A.1.2.2 Disposition*

CASA proposes an operator registration model that will address the safety issues without a full Part 119 management structure.

### **A.1.3 Comment 3 – Watering down AOC requirements**

If a small cargo aircraft is not being maintained in accordance with an approved Supplementary Inspection Document (SIDs) program or if their continuing airworthiness is no longer supported by their manufacturer, they should be placarded as not approved for passenger transport.

#### *A.1.3.1 CASA Response*

CASA agrees.

#### *A.1.3.2 Disposition*

CASA's Disposition is that registered domestic cargo-only operators will be required to maintain their aircraft in accordance with a system of maintenance approved by CASA. The operators will also be required under that system of maintenance to comply with a SIDs or equivalent document if applicable.

#### **A.1.4 Comment 4 – Operational restrictions – IFR only**

Operations should be conducted under IFR.

##### *A.1.4.1 CASA Response*

CASA disagrees. The choice of whether to operate under VFR or IFR will be a matter for the pilot to choose.

##### *A.1.4.2 Disposition*

CASA's Disposition is that flights must be conducted by holders of a commercial pilot licence with the relevant aircraft endorsements and appropriate operational ratings.

#### **A.1.5 Comment 5 – Operational restrictions – VFR only**

Operations should be confined to VFR only.

##### *A.1.5.1 CASA Response*

CASA disagrees. The choice of whether to operate under VFR or IFR will be a matter for the pilot to choose.

##### *A.1.5.2 Disposition*

CASA's Disposition is that flights must be conducted by holders of a commercial pilot licence with the relevant aircraft endorsements and appropriate operational ratings.

#### **A.1.6 Comment 6 – Operational restrictions – VFR only**

The size of the aircraft should not be a factor

##### *A.1.6.1 CASA response*

CASA disagrees.

##### *A.1.6.2 Disposition*

CASA has decided to proceed with a proposal based on a MTOW of 3500kg for aeroplanes and 3175kg for helicopters

#### **A.1.7 Comment 7 – Operational restrictions – VFR only**

Two respondents stated that size should not be a limiting factor, but complexity should be considered.

##### *A.1.7.1 CASA response*

CASA disagrees about size not being a limiting factor, however agrees about complexity. A size and complexity limitation should be commensurate with the simplified management structure that would be permitted under an operator registration system.

*A.1.7.2 Disposition*

CASA has decided to proceed with a proposal based on aircraft restricted to unpressurised propeller driven Class B aircraft.

**A.1.8 Comment 8 – Operational restrictions – VFR only**

Two respondents favoured 5700 kg as the limiting MTOW.

*A.1.8.1 CASA response*

CASA disagrees.

*A.1.8.2 Disposition*

CASA has decided to proceed with a proposal based on a MTOW of 3500kg for aeroplanes and 3175kg for helicopters.