Notice of Proposed Change (NPC 172/04)

Changes to General Aviation Aerodrome Procedures (GAAP), Class D procedures, and miscellaneous air traffic procedures

Who this NPC applies to

It is expected that the proposals for change will have a direct impact on the following groups in the aviation community:

- Pilots
- Flying organisations
- Air traffic service providers
- Air traffic controllers
- CASA staff
Foreword

Background
In July 2009, the Civil Aviation Safety Authority (CASA) introduced a number of changes to procedures at GAAP aerodromes. These changes included a limitation on the number of aeroplanes operating simultaneously in a particular aerodrome traffic circuit; a requirement for all aircraft to obtain an air traffic control (ATC) clearance to enter, cross or taxi along any runway; and changes to ATC hours of operation.

In addition, CASA gave notice that all GAAP aerodromes would be required to introduce ICAO Class D procedures from 21 April 2010. This implementation date has since been changed to 03 June 2010. The introduction of Class D procedures requires some changes to MOS Part 172 and the Aeronautical Information Publication (AIP).

CASA constantly reviews the standards contained in various Manuals of Standards, and has identified a number of obsolete or non-standard entries in MOS Part 172. The NPC covering GAAP/Class D changes provides an ideal opportunity to address a number of these issues.

Purpose of this Notice of Proposed Change
The purpose of this Notice of Proposed Change (NPC) is to initiate formal public consultation on changes to regulations and aeronautical information relating to:
- the introduction of International Civil Aviation Organization (ICAO) Class D procedures at existing General Aviation Aerodrome Procedures (GAAP) aerodromes
- alignment of procedures for existing Class D aerodromes with those to be introduced at the former GAAP aerodromes.
- addressing findings of the 2008 ICAO Universal Safety Oversight Audit Programme (USOAP) audit with respect to wake turbulence and visual separation requirements.
- correcting a number of obsolete or non-standard entries in the Manual of Standards (MOS) Part 172 – Air Traffic Services.

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 Paragraph 9(1)(c) and Section 16
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 NPC) and returning it to CASA by 19 March 2010.
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 **19 March 2010** have been considered.


Peter Boyd  
Executive Manager  
Standards Development and Future Technology  

19 February 2010
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★ YOU CAN RESPOND ONLINE OR BY FAX, POST OR E-MAIL ★

A web-based online response form is offered as an alternative to the printed form in this NPC. Online submission is the preferred method of sending your comments to CASA. If you are connected to the Internet, type casa.gov.au/newrules/ors into your web browser and follow the links for this NPC.

Annex A – Proposed Amendments .................................................... A1
Abbreviations

AA  Airservices Australia
AIP  Aeronautical Information Publication
AIRAC  Aeronautical Information Regulation and Control
ATC  air traffic control
ATS  air traffic services
CASA  Civil Aviation Safety Authority
CASR  Civil Aviation Safety Regulations 1998
CTA  control area
CTR  control zone
FAA  Federal Aviation Administration (of the United States of America)
ft  feet
GAAP  General Aviation Aerodrome Procedures
ICAO  International Civil Aviation Organization
IFR  Instrument Flight Rules
ISA  indicated air speed
m  metres
MBZ  Mandatory Broadcast Zone
MOS  Manual of Standards
NAS  National Airspace System
NFC  Notice of Final Change
nm  nautical mile
NPC  Notice of Proposed Change
NPRM  Notice of Proposed Rule Making
ORS  On-line Response System (web based comment/response system)
SCC  Standards Consultative Committee
USA  United States of America
USOAP  Universal Safety Oversight Audit Programme
VFR  visual flight rules
VMC  visual meteorological conditions

Definitions

The Proposed Changes

1. The MOS Consultation Process

1.1 CASA is committed to working cooperatively with the aviation industry to maintain and enhance aviation safety. The CASA Standards Consultative Committee (SCC) is a joint industry/CASA forum that brings together CASA staff and representatives from a diverse range of aviation industry organisations, to jointly develop regulatory change material. The SCC examines proposed regulatory changes to determine if they are worth pursuing and assists CASA in establishing and servicing change projects. CASA and industry experts work together in SCC Sub-Committees and project teams, to develop regulatory material (both new regulations and amendments).

1.2 Civil Aviation Safety Regulations 1998 (CASR) Subpart 11.J specifies the procedures for consultation on a Manual of Standards (MOS) or amendments to a MOS.

1.3 CASA conducts consultation on the initial development of a MOS, generally in conjunction with the development of the particular CASR Part and through the Notice of Proposed Rule Making (NPRM). This consultation aims to improve the quality of the document and to ensure that persons likely to be affected by the proposals have an adequate opportunity to comment on the content of the proposed changes.

1.4 The Notice of Proposed Change (NPC) is CASA’s preferred method of articulating all proposed changes to a MOS for aviation community/stakeholder comment in accordance with CASR 11.280. The NPC will be posted to the CASA ‘Rules Development’ Website. The availability of the NPC will be notified through the CASA Website and, where relevant, to affected stakeholders. The process has also been applied in this NPC for consulting the changes to CASA legislative instrument ‘Instructions — use of Global Positioning System (GPS)’, made under regulations 174A and 179A of the Civil Aviation Regulations 1988 (CAR 1988).

1.5 Consultation on proposed changes will generally be directed to a particular body or organisation that sufficiently represents, or a combination of particular bodies or organisations that together sufficiently represent, the interests of most persons, or of all persons, likely to be affected by the proposed changes to the MOS.

1.6 All comments to proposed MOS changes are to be submitted in writing to CASA, preferably on the Response Sheet provided in the NPC, or by using the On-line Response System (ORS), by Email, or by facsimile. Details of how to submit comments can be found on the Response Sheet and the rear cover of this NPC.

What CASA does with your comments (Ref: CASR 11.290)

1.7 At the end of the response period, all submissions will be analysed, evaluated and considered by the relevant project/working group.

1.8 CASA is required to register each comment and submission received, but will not individually acknowledge a response unless specifically requested.
1.9 A consolidation of all comments received, CASA’s response and disposition actions and the final amendments will be prepared and provided to all respondents to the NPC. This information will be published in a document called a Notice of Final Change (NFC) and will close the consultation on the proposed changes discussed in the NPC. The NFC will be posted to the CASA ‘Rules Development’ Website.

2. **Purpose of Changes**

2.1 The purpose of this NPC is to consult on the changes to MOS Part 172 and the Aeronautical Information Publication (AIP) required to:

- enable the introduction of International Civil Aviation Organization (ICAO) Class D procedures at existing General Aviation Aerodrome Procedures (GAAP) aerodromes;
- align procedures for existing Class D aerodromes with those to be introduced at the former GAAP aerodromes;
- provide closer alignment of the Australian wake turbulence and visual separation requirements with ICAO standards; and
- correct a number of obsolete or non-standard entries in the Manual of Standards (MOS) Part 172 – Air Traffic Services.

3. **Persons Affected**

3.1 CASA has identified the stakeholders most affected by the proposed changes as being pilots, flying organizations, air traffic service providers, and air traffic controllers.

4. **Proposed Changes**

4.1 Readers will find in Annex A that proposed changes are divided into three categories:

- E (Editorial/correction/clarification);
- O (Omission); and
- S (Changes made to existing Standard).

The reasons for each change are set out alongside the proposed change.

5. **Synopsis of Change Proposals**

**GAAP Aerodromes to be reclassified Class D**

5.1 CASA proposes to reclassify GAAP aerodromes and associated control zones (CTR) as Class D. According to the ICAO classification of airspace, this means the following services will be provided at aerodromes previously classified as GAAP:

- Aircraft planned according to the instrument flight rule (IFR) will not be required to conform to the Visual Flight Rule (VFR) when visual meteorological conditions exist – unlike the current requirement at GAAP aerodromes.
• All flights will receive an air traffic control service.
• IFR flights will be separated from IFR and Special VFR flights, and will receive traffic information about VFR flights (and traffic avoidance advice on request).
• VFR flights will receive traffic information about IFR and VFR flights (and traffic avoidance advice on request).
• Special VFR flights will be separated from Special VFR flights.
• Other procedures and requirements will apply as described in the sections covering procedures to apply in Class D airspace and at the respective controlled aerodromes.

Entry into Class D airspace by establishing 2-way communications

5.2 CASA proposes a new method for clearing aircraft to enter any Class D airspace (including existing Class D airspace) – by establishment of 2-way radio communications. This method is used in the National Airspace System (NAS) of the United States of America (USA). Where an aircraft contacts air traffic control (ATC) at a Class D aerodrome and provides sufficient information about track/position, level, and intentions for ATC to make an informed decision, ATC may clear the aircraft to enter the airspace by simply acknowledging the transmission with the aircraft’s callsign. ATC will generally include an executive instruction (JOIN …; OVERFLY …; REPORT …) with this acknowledgment. The acknowledgement authorizes the aircraft to enter the Class D airspace following the stated track and level or any alternative instruction given by ATC. Once clearance to enter the Class D airspace is given, the pilot will be required to maintain 2-way radio communications and to comply with any subsequent ATC instructions.

5.3 In practice, establishing 2-way communications will not be the only way to gain entry to Class D airspace; ATC may issue a full ATC clearance or entry instruction. Entry to Class D airspace from adjoining Class C airspace will be automatically provided in the Class C clearance.

5.4 Establishment of 2-way communications will not apply for taxi clearances or clearances to operate on the manoeuvring area of an aerodrome. As is currently the case at all Australian aerodromes, specific clearance will be required to taxi or enter, cross or back-track a runway.

Visual meteorological conditions for Class D airspace

5.5 CASA proposes to adopt the Federal Aviation Administration of the USA (FAA) specification for visual meteorological conditions (VMC) within all Class D airspace – former GAAP and existing Class D. The proposed specifications are as follows:

<table>
<thead>
<tr>
<th>Type of Aircraft</th>
<th>Flight visibility</th>
<th>Distance from Cloud Horizontal/Vertical</th>
<th>Additional Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>Aeroplanes, helicopters and balloons</td>
<td>5,000 metres (m)</td>
<td>600 m horizontal 1,000 feet (ft) above 500 ft below</td>
<td>ATC may permit operations in weather conditions that do not meet these criteria (Special VFR).</td>
</tr>
</tbody>
</table>
5.6 Compared to the ICAO specification for Class D airspace, the differences are that aircraft must be able to maintain:

- a horizontal distance of 600 m from cloud instead of 1,500 m per the ICAO standard; and
- a vertical distance of 500 ft below cloud instead 1,000 ft per the ICAO standard.

**Maximum speeds in Class D airspace**

5.7 CASA proposes to adopt the FAA specification for maximum speed within Class D airspace (former GAAP and existing Class D), as follows:

- 200 knots Indicated Air Speed (IAS) – at or below 2,500 ft above aerodrome level (AAL) within 4 nautical miles (nm) of the primary Class D aerodrome; and
- 250 knots IAS – in other parts of Class D airspace

5.8 If traffic conditions permit, ATC will be able to approve a pilot's request to exceed the 200 kt speed limit to a maximum limit of 250 kt, unless the pilot informs ATC a higher minimum speed is an operational requirement.

**Parallel runway operations at Class D aerodromes**

5.9 CASA proposes to adopt the FAA traffic management standards that allow ATC to sequence aircraft for simultaneous, independent, same direction operations on close spaced parallel runways at all Class D aerodromes under specific meteorological conditions. The proposed standards allow continuation of existing parallel runway operations at the current GAAP aerodromes. However, there is an exception at Archerfield aerodrome: At this location a jet aircraft would not be able to land or take off on a parallel runway independently of aircraft operating on the adjacent parallel runway. Other aircraft types are not affected. In such cases, ATC would apply appropriate separation between the jet aircraft and aircraft on the adjacent parallel runway.

**Use of aerodrome approach points to be recommended not mandatory**

5.10 Under current rules, flights arriving at a GAAP aerodrome from outside controlled airspace must track visually via a GAAP aerodrome approach point as specified in ERSA (See AIP ENR 1.1 para 31.5). In aligning rules at GAAP aerodromes with Class D, CASA proposes that use of an ‘aerodrome approach point’ (for example: 2RN) becomes a ‘recommended practice’ rather than a ‘mandatory requirement’. These will become Visual Approach Points. However, ATC will retain the ability to instruct an aircraft to enter Class D airspace via a particular point.

**No requirement for departure reports by VFR flights at Class D aerodromes**

5.11 Under current GAAP procedures, VFR aircraft are not required to make a radio report on departure from a GAAP aerodrome. CASA proposes to extend this concession to all Class D aerodromes (former GAAP and existing Class D).
Wake turbulence separation minima

5.12 In 2008, ICAO conducted an audit of aviation regulation in Australia under the ICAO Universal Safety Oversight Audit Programme (USOAP). One of the findings was that one particular ATC wake turbulence separation minimum was less than the standard specified in ICAO Standards and Recommended Practices (SARPs). To address the finding, CASA proposes to adjust the time separation minimum for a light wake turbulence category aircraft landing behind a medium wake turbulence category aircraft from 2½ minutes to ICAO-standard 3 minutes.

5.13 CASA also proposes to change the pilot/ATC responsibility for wake turbulence separation during the times a pilot are required to maintain own separation with a preceding aircraft. When a pilot is maintaining own separation with another aircraft, the pilot is also required to avoid the wake turbulence generated by the aircraft. This is consistent with world-wide practice. However, unique to Australia is a requirement that ATC resumes responsibility for applying a wake turbulence separation minimum for the final part of an aircraft’s landing. CASA proposes to omit this unique requirement. This would mean the pilot of an aircraft maintaining own separation with another aircraft will be responsible for avoiding the wake turbulence from the preceding aircraft at all stages of the flight, including the landing. To assist the pilot, ATC would be required to issue a wake turbulence caution when wake turbulence separation is not applied and wake turbulence may have an adverse effect on the aircraft.

Visual separation requirements

5.14 Another finding of the 2008 USOAP audit was that Australia allowed the use of visual separation above the limits specified in ICAO SARPs. To address this finding, CASA proposes to limit the use of visual separation to aircraft operating at or below 10,000 ft, instead of the current limit of Flight Level (FL) 125.

Miscellaneous editorial changes

5.15 CASA proposes a number of editorial changes to MOS Part 172 to remove obsolete or incorrect references such as several instances of the obsolete term Mandatory Broadcast Zone (MBZ).

6. Impact of changes

6.1 CASA made the decision to classify GAAP aerodromes to ICAO Class D after reviewing a body of evidence of safety incidents, traffic levels and operational risk. This reclassification was seen to be the most appropriate way to address the identified safety risks whilst minimising the impact on high-density training operations that take place at the subject aerodromes.

6.2 In selecting a solution, CASA was guided by:

- ICAO Annex 11 standards for airspace services; and
- FAA procedures and weather criteria with respect to procedures for entry into and operations within Class D airspace.
One system for Class D

6.3 Having made the decision to reclassify GAAP aerodromes and associated control zones (CTR) as Class D, CASA considered the impact on existing Class D aerodromes; in particular whether 2 distinct types of Class D airspace – former GAAP and existing Class D could exist concurrently. It was evident there would be significant safety issues resulting from the existence of a particular airspace class with different procedures depending on location. Accordingly, CASA has made the decision to adopt common standard procedures for all Class D aerodromes; be they former GAAP or original Class D. This decision does not affect the ability for individual aerodromes to specify local procedures in ERSA.

Proposed changes require significant training and education effort

6.4 CASA proposes to make significant changes to the way operations are conducted at both existing GAAP and Class D aerodromes. CASA recognises the effect of this and will be undertaking a significant training and education campaign to ensure that the aviation system – pilots, flying organisations, aerodrome operators and air traffic controllers – are prepared for these changes.

GAAP Aerodromes to be reclassified Class D - Impact on IFR operations

6.5 For aircraft planning to fly in accordance with the IFR, the impact of the reclassification of GAAP airspace to Class D is that these aircraft will be treated as IFR and provided with IFR services as long as the pilot chooses to operate in compliance with the IFR.

6.6 The fact that IFR flights will not be forced to operate to the VFR in VMC is considered a positive impact because a pilot may have valid reason for maintaining compliance with IFR in nominally VMC conditions and should have the right to maintain the planned flight rules. On the other hand, IFR aircraft may experience more delays than previously, because ATC will now be required to apply separation with other IFR aircraft operating in the Class D airspace or adjacent controlled airspace. On days when VMC exists, a mitigator for the potential increased delays will be the ability for IFR flights to nominate VFR for the departure and arrival.

GAAP Aerodromes to be reclassified Class D - Impact on VFR operations

6.7 For VFR operations at former GAAP aerodromes, the impact of the change is as follows:

- In VMC: Nil Impact.
- New VMC criteria will apply. In conditions of reduced cloud base, in particular, the VMC criterion for vertical distance below cloud will change from merely remaining clear to requiring 500 ft vertical clearance.
6.8 In conditions where the cloud base is less than 500 ft above normal circuit height, the change in VMC criteria can limit the opportunity for unconditional VFR circuits. The impact of this depends on the frequency that such cloud conditions occur. In some circumstances this may be alleviated by the ability for aircraft to fly closer, horizontally, to cloud under the new VMC criteria – 600 m as compared to the current 1,500 m. As is currently the case, and subject to IFR traffic, the option for Special VFR will be available.

**Impact of change to VMC criteria in existing Class D airspace**

6.9 The impact of the change to VMC criteria at current GAAP airports is discussed in the section above on impact on VFR operations resulting from the reclassification of GAAP aerodromes to Class D.

6.10 For VFR aircraft in existing Class D airspace, the change to VMC criteria will have a positive impact because new criteria will provide greater opportunity for unrestricted VFR operations. On the other hand, the reduced minimum spacing below cloud means that there is reduced interval (when compared with the current VMC criteria) between an IFR aircraft breaking out of the base of cloud and then conflicting with a VFR aircraft operating at the VFR minimum beneath cloud. Mitigating this issue is the fact that the proposed minima are used successfully in the USA in similar situations and further because in Class D airspace, ATC would forewarn the IFR aircraft about any conflicting VFR traffic and facilitate an appropriate course of action.

**Entry into Class D airspace by establishing 2-way communications – impact of change**

6.11 The proposed 2-way radio communications-method for entering Class D airspace is expected to have no impact on operations in the current GAAP airspace. The proposed system is currently in use in this airspace.

6.12 With respect to existing Class D airspace, the 2-way radio communications-method should result in a reduction in the communications required to gain entry clearance to the airspace. This potentially frees ATC to concentrate on other issues. On the other hand, there is the potential problem of misunderstood communications resulting in an un-authorised entry into the airspace. The traditional clearance process – clearance request, clearance issue, readback of clearance – reduces the likelihood of this misunderstood communications. However the traditional method takes up significant ‘air time’ and can be unnecessarily convoluted. This is particularly the case when a pilot makes a straightforward request to do something (eg ‘Request transit the control zone northbound coastal at 500 feet’ ft), ATC understands what the pilot wants to do and so clears the pilot (eg Track northbound coastal 500 ft), and the pilot then has to essentially repeat the original request as a response. Under the proposed change, ATC response could (but not always) be as simple as instructing the pilot to report at a particular location. The proposal does not eliminate the availability of the traditional method where indicated, but provides an abbreviated clearance option for use where there exists mutual pilot-ATC understanding of proposed course of action.
Impact of aerodrome approach points becoming recommended not mandatory

6.13 The positive impact of aerodrome (visual) approach points becoming recommended rather than mandatory is that pilots are provided with more options when there is congestion at a particular aerodrome approach point or when tracking via an aerodrome approach point is a significant impediment. Aircraft are still encouraged to use aerodrome approach points because they provide an orderly path for entering the traffic circuit and provide assurance of separation from adjoining controlled airspace. ATC also has the ability to require an aircraft to track via a particular approach point. However, when multiple aircraft are required to converge to the same point at the same level, there is an increase in collision risk. The proposed change is intended to mitigate this risk.

Impact of change to maximum speeds in Class D airspace

6.14 The intended impact of the change to maximum speed is to reduce the possible speed differential between aircraft entering and operating within the Class D aerodrome traffic circuit. Smaller speed differential between aircraft reduces spacing problems in the circuit area and facilitates orderly entry. For those aircraft unable to conform to the speed restriction, ATC will have the option to relax the new restriction.

Impact of the change to wake turbulence separation procedures

6.15 The most significant impact of the proposed change to wake turbulence procedures is that, when maintaining own separation with a larger aircraft ahead, pilots will have to exercise more caution during the landing phase. There are a variety of techniques for avoiding wake turbulence on landing, including flying an approach that is above the larger aircraft's final approach flight path. CASA intends to focus training efforts on the aspect.

6.16 For ATC, the proposed change will reduce ATC workload in establishing wake turbulence separation, particularly if a pilot has closed up on the preceding aircraft (perhaps because he/she is slightly higher or expects to land deep). A negative aspect of the current procedures for foreign students learning to fly in Australia is the development of an unhealthy expectation that ATC would provide the same service in their country of origin - which would not be the case. The proposal intends to overcome this aspect.

Impact of other proposed changes

6.17 Removing the requirement for departure reports by VFR flights will reduce frequency congestion. CASA’s assessment is that the other changes proposed in this NPC will have a low impact on ATC and aircraft operators.
7. **Implementation date for GAAP and Class D changes**

7.1 The changes to GAAP aerodrome and Class D airspace arrangements will take effect on **Thursday 03 June 2010** – an Aeronautical Information Regulation and Control (AIRAC) date. This date allows production and release of aeronautical document and chart changes.
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NPC Response Form

PROPOSED AMENDMENT TO MOS PART 172 – AIR TRAFFIC SERVICES

Please complete your response by 19 March 2010 and return it by one of the following means:

Online (preferred method*) casa.gov.au/newrules/ors
Fax 1800 653 897 (free call in Australia)
Post (no stamp required in Australia) CASA’s Standards Development Branch
Reply Paid 2005, Canberra ACT 2601, Australia
E-mail (use the response format in this NPC) npc172_04@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 casa.gov.au/newrules/ors 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: ………………….…

How are you responding to this questionnaire/proposal, i.e. whose views are represented in your response?

☐ Private individual ☐ Aviation industry body/association ☐ Staff association/union
☐ Government agency/authority/department/council ☐ Aviation business owner/service provider ☐ Other

Please advise your main involvement in aviation:

☐ Passenger/public consumer of aviation services ☐ Air crew for passenger-carrying activities ☐ Air crew for non-passenger-carrying activities
☐ Ground support for passenger-carrying activities ☐ Ground support for non-passenger carrying activities ☐ Other (specify below*)

* Details: _____________________________________________________________________

Are you satisfied with CASA’s consultation on this issue?

☐ Very satisfied ☐ Satisfied ☐ No opinion ☐ Dissatisfied ☐ Very dissatisfied

Document NPC 172/04
Your Response to the Proposed Amendments
(Please also refer to Annex A)

CASA invites you to advise your acceptance, or otherwise, for the proposed changes to the standards contained in this NPC by indicating your preference and commenting below. Refer to Annex A for full details of the proposed amendment.

**MANUAL OF STANDARDS PART 172**

**Chapter 10, Section 1: Add Paragraph 10.1.4**
- [ ] proposal is acceptable without change
- [ ] changes would improve it, but it is acceptable (please provide details below)
- [ ] changes would make it acceptable (please provide details below)
- [ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __________________________________________________________________________________________

**Chapter 10, Section 3: Omit Section 10.3.2**
- [ ] proposal is acceptable without change
- [ ] changes would improve it, but it is acceptable (please provide details below)
- [ ] changes would make it acceptable (please provide details below)
- [ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __________________________________________________________________________________________

**Chapter 10, Section 6: Amend section 10.6.4 standard ‘T7c’**
- [ ] proposal is acceptable without change
- [ ] changes would improve it, but it is acceptable (please provide details below)
- [ ] changes would make it acceptable (please provide details below)
- [ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __________________________________________________________________________________________

**Chapter 10, Section 10.6: Amend Paragraph 10.6.10.2**
- [ ] proposal is acceptable without change
- [ ] changes would improve it, but it is acceptable (please provide details below)
- [ ] changes would make it acceptable (please provide details below)
- [ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __________________________________________________________________________________________
Chapter 10, Section 10.10: Amend Section 10.10 Visual Separation
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 10, Section 10.12: Amend Section 10.12 Wake Turbulence Separation
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 10, Section 10.13: Omit Section 10.13.8
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 10, Section 10.13: Omit Section 10.13.9 last row of table
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 11, Section 11.1: Omit Section 11.1.1
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 11, Section 11.1: Amend paragraph 11.1.2.3
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 11, Section 11.1: Amend section 11.1.5
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 12, Section 12.1: Insert new section (Clearance by establishment of 2-way communications)
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 12, Section 12.4: Omit section 12.4
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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Chapter 12, Section 12.5: Omit section 12.5
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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**Chapter 12, Section 12.6: Omit section 12.6**

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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**AERONAUTICAL INFORMATION PUBLICATION**

*In various places:* Omit all sections and individual references to ‘General Aviation Aerodrome Procedures’ or ‘GAAP’

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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**ENR 1. GENERAL RULES AND PROCEDURES**

**ENR 1.1 GENERAL RULES**

3. AIR TRAFFIC CLEARANCES AND INSTRUCTIONS

*Add a note at the end of paragraph 3.1*

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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**ENR 1. GENERAL RULES AND PROCEDURES**

**ENR 1.1 GENERAL RULES**

*Add a new section called ‘VFR departure by an aircraft planned IFR’*

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.1 GENERAL RULES
11. DESCENT AND ENTRY
Amend section 11.2 (VFR flights entering Classes C or D airspace)
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): _____________________________________________________________________________________________
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.1 GENERAL RULES
11. DESCENT AND ENTRY
Add a new section (Clearance to enter Class D airspace)
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): _____________________________________________________________________________________________
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.1 GENERAL RULES
13. LANDING
Add a new section (Parallel runway operations at Class D aerodromes)
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): _____________________________________________________________________________________________
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.1 GENERAL RULES
Omit section 17 (Operations in Class D airspace)
[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances
Comments or suggested changes (including an estimate of additional costs/impacts if applicable): _____________________________________________________________________________________________
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ENR 1. GENERAL RULES AND PROCEDURES

ENR 1.1 GENERAL RULES

21. RADIO COMMUNICATION AND NAVIGATION REQUIREMENTS

*Amend the table that summaries report and broadcast requirements*

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES

ENR 1.2 VISUAL FLIGHT RULES

2. VISUAL METEOROLOGICAL CONDITIONS (VMC) -- TAKE-OFF, EN ROUTE AND LANDING

*Amend the table following paragraph 2.3 (Controlled airspace – Class D)*

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.3 INSTRUMENT FLIGHT RULES
2. FLIGHT RULES NOMINATION
Amend paragraph 2.1

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.4 ATS AIRSPACE CLASSIFICATION
1. CONTROLLED AIRSPACE
Amend paragraph 1.1.2 AND 1.3.1

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.4 ATS AIRSPACE CLASSIFICATION
CLASSES OF AIRSPACE – SERVICES AND REQUIREMENTS
Amend the table summarising aircraft speed limitations

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.4 ATS AIRSPACE CLASSIFICATION
6. LANES OF ENTRY
Amend paragraphs 6.1 and 6.1.1

[ ] proposal is acceptable without change
[ ] changes would improve it, but it is acceptable (please provide details below)
[ ] changes would make it acceptable (please provide details below)
[ ] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __
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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.4 ATS AIRSPACE CLASSIFICATION
9. WAKE TURBULENCE SEPARATION STANDARDS
Amend paragraphs 9.3.1 (waivers)

[] proposal is acceptable without change

[] changes would improve it, but it is acceptable (please provide details below)

[] changes would make it acceptable (please provide details below)

[] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __

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ENR 1. GENERAL RULES AND PROCEDURES
ENR 1.6 ATS SURVEILLANCE SERVICES AND PROCEDURES
7. AIRCRAFT TRANSPONDER
7.1 Operation of SSR Transponders

Omit paragraphs 7.1.10 (operation of transponders in GAAP airspace.3.1 (waivers)

[] proposal is acceptable without change

[] changes would improve it, but it is acceptable (please provide details below)

[] changes would make it acceptable (please provide details below)

[] not acceptable under any circumstances

Comments or suggested changes (including an estimate of additional costs/impacts if applicable): __

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Specific editorial changes to MOS Part 172

CASA invites you to advise in the space provided below any additional suggested specific changes that you consider appropriate, by reference to the proposed changes to the MOS Part 172 provided in this NPC.

<table>
<thead>
<tr>
<th>Chapter/Section/Paragraph</th>
<th>Amendment(s) that you consider appropriate (suggest revised change)</th>
<th>Explanation (optional)</th>
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Your response ensures balanced consideration by CASA of the interests of the industry and consumers.

Thank you
Additional information is available from:

Jan Goosen, Air Traffic Services Specialist

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Airways and Aerodromes
Civil Aviation Safety Authority
Canberra ACT 2601, Australia

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           International +612 6217 1146

Fax  02 6217 1700
     International +612 6217 1700