Clarification of LAA’s online response because system limitation curtailed original response

The relevant section: **Review stage - significant modifications** should read:

**Modification comments:**

A number of points of concern are raised:

At pp.25, 34-35, the CAA states they will not pursue an amendment that was the subject of an ongoing or recent airspace design change. This creates a back

door by which, if an ACP were to be initiated, any amendment would be prevented. This is clearly an undesirable unintended consequence.

On p.28, regarding review times and expertise, we do not believe it is wise to agree to directions which do not require the CAA to adhere to any particular timing.

While it is accepted that amendments to classification will involve extensive analysis of data, stakeholder consultation, and cooperation with the airspace

controlling authorities, this should not exclude the need for a timely review the effectiveness of change after it has been implemented.

Although the CAA needs to protect its resource, this process should allow stakeholders to offer appropriate operational feedback.

At 5.7, p.31, we must continue to question the breadth of safety data with which the CAA works. Current data capture is predominantly from an air traffic control

and CAT perspective. This needs a fundamental change to better capture how GA pilots and operations are affected by airspace reclassification.

P.34 Electronic Conspicuity

We remain concerned that the CAA still has not developed a meaningful and credible strategy in this area beyond an attempt to mandate a single area of

technology (ADS-B). We strongly believe that leadership from regulators should drive the development of modern, up to date, reasonably priced technology,

based on developing compatibility and interoperability of existing, installed systems, rather than mandated equipment carriage.

There are already demonstrated systems which combine an infrastructure of both aircraft and land based equipment, which receive multiple protocols, translate,

and rebroadcast in multiple protocols – and they do not depend on replacement of existing aircraft equipment.

It is noteworthy that EASA last year specifically recommended against such a mandate, and the European Commission has explicitly promised Europe Air Sports

that there is no intention to extend the existing (limited to CAT) electronic conspicuity mandates in the short term.