

Via Email: regulatoryconsultation@casa.gov.au

15 September 2017

Mr Shane Carmody
Chief Executive Officer and Director of Aviation Safety
Civil Aviation Safety Authority

Dear Mr Carmody,

Submission on *Review of RPAS operations* discussion paper

I am pleased to provide a submission on the Civil Aviation Safety Authority's *Review of RPAS operations* discussion paper.

The National Transport Commission (NTC) is an independent statutory body advising state, territory and Commonwealth Ministers on national reforms to improve land transport safety, productivity, efficiency, environmental performance and regulatory efficiency. In doing so we develop, monitor and maintain uniform or nationally consistent regulatory and operational arrangements for road, rail and intermodal transport.

Remotely Piloted Aircraft (RPA) currently operate within the national aviation system. However, we are moving towards a future characterised by integrated, technology-driven and customer-centric mobility solutions. Coordinated policy-making between transport departments and agencies across sectors and at all levels of government will be key to managing a shift away from mode-based transport regulation.

As the uses for RPA expand we will need to consider their interaction with road and rail corridors and the potential for more integrated three-dimensional mobility corridors in the future. We are also likely to see new types of transport vehicles spanning land transport and aviation. Prototypes of road vehicles which incorporate RPA for deployment to deliver small parcels already exist; for example, the Mercedes-Benz Vision Van has been demonstrated at various international forums since 2016, and UPS' RPA delivery vehicle has been tested in the United States this year. Our regulatory frameworks for roads and aviation would require review to address this circumstance should trials and commercial deployment of this type of activity eventuate in Australia.

Thank you for the opportunity to provide a submission. Ms Michelle Hendy, Chief Planning Officer, will follow up with CASA to discuss the convergence of our sectors in the future.

Yours sincerely,



Paul Retter AM
Chief Executive Officer and Commissioner