



**PROPOSAL TO AMEND THE AIR NAVIGATION ORDER 2005 FOR THE PURPOSE OF IMPROVING THE TECHNICAL INTEROPERABILITY OF ALL AIRCRAFT IN UK AIRSPACE**

**PARTIAL RIA CONSULTATION RESPONSE DOCUMENT**

(For responses to the Partial RIA Issue 1.2)

**[Deadline for Submission is 1700 hours on 29 August 2006]**

Please enter your details in the following grid to assist in the assessment of responses

<b>Name:</b>	Bhpa Chairman And Bhpa Airspace Panel							
<b>Organisation:</b>	British Hang Gliding And Paragliding Association							
<b>Postal Address:</b>	The Old Schoolroom, Loughborough Road, Leicester, LE4 5PJ							
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<b>Group/Sector:</b>	Aerial Work	Air Taxi	Air Ambulance	Aircraft Leasing	Airline Operator	ANSP	Avionics Manufacturer	Avionics Vendor
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Flying Club	Flying School	Freight Operator	Government	Maintenance Organisation	Private Pilot	User Group	Other
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Notes on Completion:**

The consultation responses will be used by the CAA to refine its proposal and make recommendations to the Secretary of State for Transport.

**Only respondents from small aviation businesses of less than 50 employees should provide answers to 'RESPONSE 8' and 'RESPONSE 9'.**

There are three methods of completing/submitting your response to the Partial RIA. The files and links for which can be obtained via the DAP area of the CAA Web-site at the following address - [www.caa.co.uk/dapconsultations](http://www.caa.co.uk/dapconsultations). The methods are:

1. The completion of a secure 'online' form lodged on a Third Party specialist web-site.
2. The completion of a MS Word form that should be e-mailed to **mode.s@dap.caa.co.uk**
3. The completion of a paper version of this 'Response Document', available as a PDF, that should be sent to:

Mgr S&SM  
CAA House K6 G6  
45-59 Kingsway  
London  
WC2B 6TE.

If you have any queries or difficulties in completing this form, please contact us on the following:  
tele: +44 (0) 20 7453 6534/6 Fax: +44 (0) 20 7453 6565 E-mail: [mode.s@dap.caa.co.uk](mailto:mode.s@dap.caa.co.uk)

## [RESPONSE 1 – Comments on the Issues that the Proposals Seek to Address]

Please indicate whether or not you agree that the issues identified in Paragraph 2.2 from pages 2 to 9 of the Partial RIA document need to be addressed. Please indicate your opinion on each issue:

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
<b>Issue 1: Replacement of 'Classical' SSR</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Issue 2: Need to Improve Collision Avoidance Measures</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Issue 3: International Obligations and Co-operation</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Issue 4: Support for Future Surveillance Technology</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Issue 5: Efficiency of the Use of Lower Airspace</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Issue 6: Integration of UAV Operations</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Issue 7: Impact of Wind Turbines on Aviation</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Issue 8: Spectrum Availability for Primary Radar</b>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any additional comments on the issues identified in the Partial RIA. *(Click in the top left-hand corner to enter text.)*

General 1. The Issues paragraph 2.2 and sub-paragraphs are both too simplistic and go too far:  
 - they should be just a list of readily identifiable individual fully quantified issues, e.g. not combining unrelated ones such as ICAO compliance and European SES, in Issue 8 speculating about the loss of sufficient frequencies for primary radar, etc.  
 - they should be just a list of issues and not included possible solutions.

General 2. Just because there is a cross indicating that an issue needs to be addressed it is completely false to assume that it is then a flawed action to object to the solutions being proposed in the remainder of the Partial RIA, it is indicative that the proposed solutions are not the correct ones.

Issue 1. The BHPA accepts that there are limiting technical issues with "Classical" SSR. However the Partial RIA does not investigate the option of compulsory Mode S for Commercial Air Transport and Class A airspace traffic alone and whether that could be sufficient to address this issue.

Issue 2. As written Issue 2 contains far too many sub-issues to be able to answer it with a single cross in one of five boxes.

Issue 3. As written Issue 3 contains two totally separate principle matters; ICAO compliance and European harmonisation. The first is not a safety issue and as the paper illustrates the later is at a significantly immature stage and so multi-faceted therefore it is not possible to answer with a single cross.

Issue 4. Part of "future proofing", as well as preventing extra unnecessary spending in the future, is not spending now on something that will be obsolete before it can be fully utilised.

Issue 5. There is insufficient information in the Issue 5 statement to be able to give a reasoned answer.

Issue 6. The statement in Issue 6 is a gross over simplification of what is being said about UAV sense and avoid systems, which it has to be remembered are still at a very early stage of development. The UAV risk assessment for a mid-air collision would show an unsustainable level of risk were it to rely upon equipments outside the operator's control, i.e. the other aircraft's SSR equipment. Therefore with the increasing UAV activity that there is and a desire to avoid yet more airspace dedicated to UAV's there has to be work on integrating them.

Issue 7. The Issue 7 statement appears to ignore that part of ATC units' business continuity planning includes the use of primary radar in the event of an SSR failure and that the relevant risk analysis will have considered this. The implication of the Issue 7 statement is that the clutter will still be there but that is OK now. The proof of the pudding is the reworked risk analysis undertaken on a unit by unit basis. The BHPA accepts that to have degradations to existing radar systems is not acceptable, however it understands that there is alternative non-SSR related work going on into reducing the effects.

Issue 8. Again the implication is that Primary Radar will no longer feature as part of ATC units' business continuity planning, apparently in this case because there may not be the frequencies to use at some unstated time in the future. There is insufficient information to be able to give a reasoned answer.

## [RESPONSE 2 – Comments on the Proposed Policy Options]

Please indicate your opinion on the proposed policy options that have been set out in Section 4 from pages 14 to 18 of the Partial RIA document to address the background issues. Please indicate your opinion on all options:

Option	<u>Views on the Presented Options</u>	Strongly Support	Support	No Opinion	Oppose	Strongly Oppose
1	<b>Do Nothing</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	<b>SSR Mode S on all Aeroplanes and Helicopters</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2(a)	<b>SSR Mode S and 1090ES (ADS-B 'Out') Capability<sup>1</sup> on all Aeroplanes<sup>2</sup> and Helicopters</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>1</sup> Capability means that the transponders are able to support 1090ES (ADS-B 'Out') without modification but do not need to be connected to a suitable source of GPS information i.e. 1090ES (ADS-B 'Out') does not have to be 'populated' with GPS data.

<sup>2</sup> ICAO Annex 6 defines aeroplane as: 'A power-driven heavier-than-air aircraft, deriving its lift in flight chiefly from aerodynamic reactions on surfaces which are fixed under given conditions of flight.'

3	SSR Mode S on all Aircraft <sup>3</sup>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	<b><u>Views on Other Potential Options Currently Discounted by the CAA</u></b>					
2(a)/3(a)	<i>Full 1090ES (ADS-B 'Out') Functionality<sup>4</sup> that is 'Populated' with an Approved GPS</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2(a)/3(a)	<i>Full 1090ES (ADS-B 'Out') Functionality on IFR Flights Only</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2(a)/3(a)	<i>Full 1090ES (ADS-B 'Out') Functionality on Aeroplanes and Helicopters Only</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-	<i>Non-SSR Options such ADS-B via VDL Mode 4 or UAT and FLARM</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
-	<i>Airspace Segregation of Non-Interoperable Aircraft</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>3</sup> ICAO Annex 6 defines an aircraft as: 'any machine that can derive support in the atmosphere from the reactions of the air other than the reactions of the air against the earth's surface.'

<sup>4</sup> Functionality means that the transponders are able to provide 1090ES (ADS-B 'Out') information and are connected to a suitable source of GPS information i.e. 1090ES (ADS-B 'Out') has to be 'populated' with GPS data to the required standard. This standard is explained at Page E-2 of Annex E in the Partial RIA document.

### [RESPONSE 3 – Comments on the Need for Regulation]

Please indicate your opinion on whether regulatory or non-regulatory measures should be adopted to implement the policy options set out in pages 14 to 18 of the Partial RIA document. Please indicate your opinion on all options:

Option		Mandatory Equipage Through Changes to Regulations	Voluntary Equipage	No Opinion
2	SSR Mode S on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
2(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3	SSR Mode S on all Aircraft	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aircraft	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Full 1090ES (ADS-B 'Out') Functionality with Approved GPS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### [RESPONSE 4 – Comments on the Groups and Sectors Affected]

Other than those already listed in Paragraph 5.1 of the Partial RIA document at Page 19, what other sectors or groups could be affected by the CAA proposals contained in the Partial RIA document? *(Click in the top left-hand corner to enter text.)*

1. Because the volume of business is affected by the number of GA pilots available another category of Small aviation business needs to be added; Aviation goods suppliers
2. Two self explanatory categories for foreign aircraft need adding; one for those based in the UK and the other for visiting aircraft.
3. An additional category for land owners is required for two reasons:
  - 3.1 The demise of/reduction in activities that pay to use their land will alter their business models
  - 3.2 Pilots who choose to fly as renegades outwith the law will present new issues to land owners

## [RESPONSE 5 – Comments on the Potential Benefits of the Proposed Policy Options]

Please indicate whether or not you agree with the potential safety and economic benefits of the proposed policy options that are identified in Paragraph 5.2 from pages 19 to 22 of the Partial RIA document. Please indicate your opinion on all options:

Option		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
1	Do Nothing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	SSR Mode S on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3	SSR Mode S on all Aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
3(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Please indicate whether or not you believe that, in principle, the carriage and operation of SSR Mode S transponders by aircraft throughout UK airspace would improve overall safety levels		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide any supplementary information that you may have on benefits of the policy proposals, or expand on your selected responses.  
*(Click in the top left-hand corner to enter text.)*

option 1. exactly as per para 5.2.1

options 2, 2(a), 3 and 3(a) are all written from the point of view stated in para 5.2.2.4 against option 2, "...all sectors and groups would benefit from improved safety [from fitting SSR] as traffic levels and airspace complexity continue to rise." this is not true as, with the proposals as written, there are significant groups of pilots and aircraft whose actual risk level change will be so negligible as to effectively make it zero, e.g. all paraglider pilots, GA pilots who operate in the remoter parts of the UK, other aircraft operated under an exemption. indeed an over reliance upon the technology by those pilots with some form of CWS fit would actually increase the risk to exempted aircraft.

final question. there has been insufficient modelling and objective testing to prove not only that the desired results are attainable, but also that there are no consequential safety degradations.

## [RESPONSE 6 – Comments on the Estimated Costs of the Proposed Policy Options]

Please indicate whether or not you agree with the estimated costs that are identified in Paragraph 5.3 from pages 23 to 27 of the Partial RIA document:

Option		Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
1	Do Nothing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2	SSR Mode S on all Aeroplanes and Helicopters	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
2(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aeroplanes and Helicopters	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3	SSR Mode S on all Aircraft	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
3(a)	SSR Mode S and 1090ES (ADS-B 'Out') Capability on all Aircraft	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
	Costs of Equipment Set Out in Tables 5 and 6 of the RIA Document	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any supplementary information that you may have on the costs equipment or the policy proposals, or expand on your selected responses. *(Click in the top left-hand corner to enter text.)*

Option 1. The amount of supposition contained in para 5.3.2 for Option 1 is so large and wide ranging, in terms of cause, effect, time and quantity, that the claimed effect of "significant adverse consequences for the UK economy" can at best only be considered as conjecture. The information is so far from objective as to be uncommendable upon.

Options 2, 2(a), 3 and 3(a). Until there are definitive answers to the following it is not possible to know what the actual costs will be for which aircraft:

- which aircraft will have to use an ICAO compliant fit?
- which aircraft will be allowed to use an LAST?
- which aircraft will be allowed to use an LPST?
- what will the capital costs of an LPST be?
- what will the running, maintenance costs of an LPST be?

Final Question. Tables 5 and 6 of the RIA Document contain no cost data!

Final question. With respect to both Table 9 and 10 the quoting of the costs excluding VAT is disingenuous when most of the purchasers will be private individuals and so unable to recover the VAT.

All questions except option 1. As the specification for the LPST does not yet exist any costs outwith the control of the CAA can only be conjecture.

All questions except option 1. For the reasons given above it is not possible to pass a reasoned comment upon the costs

All questions except option 1. It would be resonable to expect the CAA charges elements in tables 9 and 10 to have been displayed more overtly, indeed it is difficult to see why the Estimated Costs in both tables were not broken down into more detail.



## [RESPONSE 7 – Comments on the Means by Which the Costs of the Proposed Policy Options should be Financed]

Please indicate your views on how the estimated costs of the proposed policy options set out set in pages 23 to 27 of the Partial RIA document should be financed.

	Strongly Agree	Agree	No Opinion	Disagree	Strongly Disagree
Costs to be met fully by the business aircraft operators on which they fall	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Costs to be met fully by the private aircraft operators on which they fall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Costs to be met fully by funding from Government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Costs to be met fully by funding from industry sources such as commercial airlines, ATC providers, Wind Energy, UAVs etc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Costs to be met fully by funding from a combination of private, business, Government and industry sources in proportion to the benefits that will be realised by those sectors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Costs to be subsidised by funding from Government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Costs to be subsidised by funding from industry sources such as commercial airlines, ATC providers, Wind Energy, UAVs etc	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Costs to be subsidised by funding from a combination of Government and industry sources	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any supplementary information or views that you may have on how the policy proposals should be financed, or expand on your selected responses. *(Click in the top left-hand corner to enter text.)*

General. The UK Government has a policy of "the user pays", this is actually more accurately stated as "the beneficiary pays". Additionally there is also the principle of "proportionality" cited as a core principle of the EU. Without doubt the beneficiaries, through greater freedom to operate and generate income would be commercial airlines, ATC providers, wind energy companies, the military (who, although significant, aren't mentioned in any of the questions above but are taken to be included in Government), commercial airports (who also aren't mentioned) and UAV operators

Question 1. There is no definition of what is meant by "business aircraft operators" thus it isn't possible to pass comment upon this question.

Question 2. The private owners will see little or no benefit from SSR fitting when compared to others, the beneficiaries should pay.

Question 3. It would be inappropriate for the tax payer to subsidise the commercial beneficiaries of a compulsory SSR fit.

Question 4. The same reason as for Question 2.

Question 5. The same reason as for Questions 2 and 4. It would be up to those paying to decide the proportions

Question 6. The same reason as for Question 3.

Questions 7 and 8. Without details of how the level of subsidy would be decided it isn't possible to pass comment upon this question.

**[RESPONSE 8 – SMALL BUSINESSES ONLY]**

Please indicate the number of employees in your business.

0-4	5-9	10-19	20-29	30-49
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

In the table below, please enter the number of aircraft operated by your business and for which you are responsible for equipping with the required systems/avionics:

	Motorised	Non-motorised
Maximum take-off mass of less than 750 kg	0	0
Maximum take-off mass of 750 kg or greater but less than 1,200 kg	0	0
Maximum take-off mass of 1,200 kg or greater but less than 3,700 kg	0	0
Maximum take-off mass of 3,700 kg or greater but less than 5,700 kg	0	0
Maximum take off mass of 5,700 kg or greater	0	0

**[RESPONSE 9 – SMALL BUSINESSES ONLY]**

This question refers the small business issues set out in pages 27 to 29 of the Partial RIA document. Please highlight all adverse impacts that the proposed policy options **could** have on your business:

Option		No impact	Minor Impact	Major Impact	Cease trading	Competition Affected
1	Do Nothing	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	SSR Mode S on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2(a)	SSR Mode S and 1090ES Capability on all Aeroplanes and Helicopters	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3	SSR Mode S on all Aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
3(a)	SSR Mode S and 1090ES Capability on all Aircraft	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Full 1090ES (ADS-B 'Out') Functionality with Approved GPS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Airspace Segregation of Non-Interoperable Aircraft	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any additional comments/information to help quantify the financial impact of the proposed policy options on your business and any likely affect on competition. Where appropriate, please suggest any Simplification Measures that could be considered to offset the financial burden. **(Click in the top left-hand corner to enter text.)**

General. Although not a direct operator of any aircraft the BHPA is totally dependant upon the viability of hang and paragliding within the UK for its survival

Options 2 and 2(a) would impact the use of microlights for aerotowing greatly increasing the annual costs and so affecting the viability of those operations. Subject to definitions it could also significantly affect self-propelled hang-gliders (aka powered hang gliders and paragliders).

Options 3, 3(a) and "Full 1090ES". Compulsory SSR carriage would, through cost and complexity increases, decimate foot launch operations of all disciplines and will result in a high proportion of our members resigning from the association and undertaking renegade flying without a transponder. Foot launch tuition, all of which is done commercially, would cease or move abroad and the delicate balancing act that is the BHPA's finances would collapse.

Final question. There is insufficient information on what is proposed by airspace segregation for a reasoned answer to be given.

**[RESPONSE 10 – Additional Comments and Feedback]**

Please provide any additional comments or information that you feel the CAA should take into account.  
*(Click in the top left-hand corner to enter text.)*

Please see the attached BHPA Position Paper

## **[RESPONSE 11 – Publication of Consultation Responses]**

For consultation exercises such as this, the CAA by default makes all responses/information available on request. It is accepted, that under exceptional circumstances, this may not be conducive to open/frank responses. Consequently, please indicate here if you desire to have your personal details withheld in the event of any general enquiry against this consultation:

	<b>Yes</b>
<b>Please withhold my personal details in the event of any general enquiry</b>	<input type="checkbox"/>

*[At the end of the consultation period for the Partial RIA document, all comments and feedback will be analysed. The policy proposals will be reviewed in light of the feedback received from the public consultation and a Full RIA document will be prepared for submission to the Secretary of State for Transport. The Full RIA will contain any updated information, together with a recommendation on how to proceed and what policy option should be adopted. The consultation feedback will also be recorded in the Full RIA so that it can be taken into account by the Minister. The intention is to submit the Full RIA document and, if appropriate, any draft regulatory amendments to the Air Navigation Order 2005 by the end of 2006.]*

**Thank you very much for taking the time to complete this consultation response document. All responses will be analysed and taken into account when forming the final recommendations to Government.**