Australian Government
Department of Defence

DEFENCE AVIATION SAFETY AUTHORITY

COMMENT RESPONSE DOCUMENT TO NPA 2022-018 – DASR SPA.50 DEFENCE NAVIGATION APPROVALS

INTRODUCTION

1. **General.** This Comment Response Document (CRD) summarises DASA's agreed regulation changes as a result of the Notice of Proposed DASR Amendment (NPA) process to NPA 2022-018, and finalises public consultation on the NPA. DASA will consider arguments opposing the views expressed in this CRD only in exceptional circumstances. Any member of the regulated community having arguments to support an appeal against the decisions documented in this CRD may petition DASA.

2. **Background.** DASA released NPA 2022-018 (*DASR SPA.50 Defence Navigation Approvals*) for regulated community comment on 17 Aug 23. The period for public comment closed on 13 Sep 23. DASA subsequently consulted with each environmental command HQ to ensure the DASA responses to NPA feedback were acceptable.

ANALYSIS OF COMMENTS

General

3. DASA received 87 comments in response to NPA 2022-018. The comments are individually listed in Annex A together with their corresponding DASA responses.

Environmental command endorsement positions

4. Environmental command HQs provided endorsement to NPA 2022-018 as follows:

a. HQFAA accepted the proposal without change

b. HQ AVNCOMD and HQAC advised the proposal was acceptable, but would be improved if DASA made the changes detailed in Annex A.

5. **DASA response**. DASA accepted and incorporated the majority of feedback into the revised regulation. DASA forwarded the revised draft back to each environmental command HQ, and received subsequent endorsement.

Environmental command resource implications

6. HQFAA, HQ AVNCOMD and HQAC advised that additional resources are not required as a result of NPA 2022-018.

7. **Transition plan**. DASA incorporated a transition plan with the update to *DASR SPA.50*. In this plan, DASA will provide a 12 month transition period, commencing on the date of publication of *DASR SPA.50*. This transition period will allow the regulated community to make the necessary changes to their management systems. DASA will not enforce compliance with *DASR SPA.50* when conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.

AUTHORITY

8. The content of this Comments Response Document is authorised.

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Feb 24

Annex:

A. NPA 2022-018: *DASR SPA.50 Defence Navigation Approvals* – Regulated Community Feedback

NPA 2022-018: DASR SPA.50 DEFENCE NAVIGATION APPROVALS - REGULATED COMMUNITY FEEDBACK

LSN	Issued DASR Feedback Reference: (ie DASR number, NPA paragraph etc.)	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
					BP35025859: Regulatory Document - NPA 2022-018 Rev 0 DASR SPA.50 'Defence Navigation Approvals'	
1	Entry withdrawn	HQAC				
2	General	HQAC		Paragraph formatting - Should the single AMC or GM paragraphs throughout have an 'a.' prefix?		In accordance with the DASA Style Guide numbering hierarchy, single paragraphs are not numbered. Consulted with HQAC
3	DASP Glossary additions	HQAC		Are all of these definitions required to be placed in the Glossary?	How many of the proposed terms are likely to be used elsewhere in the DASPMAN than in this one Part? Include any that are only for this Part in the initial GM rather than the Glossary.	The terms in the Glossary meet the inclusion criteria. Consulted with HQAC
4	DASP Glossary additions	HQAC		Why is CAA not included as an addition to the Glossary given that it does not currently exist there, but is to be added to the Acronyms list?		DASA has included the definition for CAA in the DASP Glossary Of Terms
5	GM SPA.50.a	HQAC		Is CAA the new NAA?	Is there going to be a change applied to all uses of NAA throughout the DASPMAN?	DPEPS directed CAA to be used vice NAA for future regulatory documents. As advised at Policy COP 6 July 2023 DASA has begun using the term 'Civil Aviation Authority' vice 'National Aviation[/Airworthiness] Authority' in order to promote clarity and consistency. The change will be promulgated throughout the DASP Manual in Feb 24 and formally communicated to the regulated community at that time. ICAO defines and uses the term Civil Aviation Authority (eg see ICAO Doc 8400 ICAO Abbreviations and Codes, ICAO Doc 9734 Safety Oversight Manual Part A para 1.1.2) in the same sense that DASA now uses the term. The term 'National Aviation(/Airworthiness) Authority' has its genesis in the EASA framework as a means to refer to the CAAs of the member states as opposed to EASA itself. The term does not capture EASA, being a supranational agency, and is not immediately identifiable as referring to a civil or military organisation. Consulted with HQAC
6	GM SPA.50.a	HQAC		Introduce 'CAA' in full for first use.	Or is that not required because is in Acronym list?	DASA has not incorporated the suggestion. CAA is included the DASP Glossary and Acronyms Lists Consulted with HQAC
7	GM SPA.50.b	HQAC		~~The following~~ The following	Delete repetition.	The repetition has been deleted. LSN 53 refers.
8	SPA.50(a)	HQAC		'~~Defence~~ navigation Operations' . Do not consider there to be a need to define as Defence Operations.	All of the operations are also conducted by civilian operators. Just because they are being conducted by Defence-registered aircraft does not make them Defence operations. Ten references within the Part are to plain 'navigation Operations'; there are only four using Defence (3 IR, 1 AMC). The four occasions in the Part will need updating.	DASA has not incorporated the suggestion. DASA has adapted and not adopted civil requirements related to Performance Based Navigation. However, Defence aircraft conduct PBN operations in civil and military airspace. The specific reference to Defence navigation Operations is designed to mitigate risks arising from assuming a common regulatory set. DASA to check consistence of Defence navigation operations throughout. Consulted with HQAC

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9	AMC SPA.50(a)b.i(a) to (j), and AMC SPA.50(a)b.ii.	HQAC		Why do all these navigation operations have to be approved by DASA when the same requirement is not placed on Australian civilian operators by CASA.	CASA MoS Pt91 only specifies RNP AR (DEP and APCH) as requiring authority approval. See CASA AC 91-05 v1.0 - PBN, Section 3.2, and AMC and GM Part 91 v2.3, Section 4.4.3.	The CASA controls require the Operator to utilise aircraft equipment that is TSO, without the use of workarounds. In addition, the aircraft Flight Manual requires a statement that the aircraft is capable of the particular PBN operation. Furthermore, CASA surveillance also includes an annual audit of the Operator's PBN training program to verify compliance. Consulted with HQAC
10	AMC SPA.50(a)b	HQAC		…. in the OpSpec for the following: i. Performance …….. (PBN) ii. Reduced ….. (RVSM) iii. North …… (NAT HLA).	If the request to remove the requirement for DASA to approve all navigation Operations is not accepted - do not consider that there is any need to have the lists as AMC. The GM is able to depict what navigation approvals are applicable for the relevant navigation Operations. Extant NPA sub-paras iii and iv re-labelled as ii and iii.	DASA has not incorporated the suggestion. AMC is the means to depict how to obtain new or revised approval for PBN Navigation Specifications. LSN 9 also refers Consulted with HQAC
11	AMC SPA.50(a)b.i, ii and iii	HQAC		Replace per suggestion for AMC SPA.50(a)b above.		LSN 10 refers Consulted with HQAC
12	AMC SPA.50(a)b.iv	HQAC		Delete per suggestion for AMC SPA.50(a)b above.		LSN 10 refers Consulted with HQAC
13	AMC SPA.50(a)b.i.(j) and (k)	HQAC		Is the use of 'including' to account for future expansion of types of RNP APCH and RNP AR?	If they are to be considered as definitive lists then remove 'including'.	DASA has not incorporated the suggestion. The use of the word 'including' provides clarity and allows for expansion. Consulted with HQAC
14	GM SPA.50(a)-1 Table	HQAC		The Table is referenced from a CASA AC that is no longer current. Is the content accurate?		Although CASA AC 91.U-01 has been withdrawn the content of the Table GM SPA.50(a)- 1 remains accurate. Consulted with HQAC
15	AMC1 SPA.50(b)4.a.ii	HQAC		What is the rationale behind the inclusion of this direction on risk assessments?		Risk assessments are internationally accepted as a means to identify hazards and to assess risks. The DASR risk assessment requirement acknowledges the need to broaden the scope of the civil risk assessment to ensure the identification of hazards unique to Defence PBN operations. To more effectively indicate the risk mitigation controls required, DASA revised AMC1 SPA.50(b)4.a.ii: *risk assessments in accordance with DASR SMS, inclusive of consideration of the scope of Operations for the requested navigation approvals.* Consulted with HQAC
16	AMC1 SPA.50(b)4.a.ii	HQAC		What benchmarked example has it come from?		The Bow Tie Analysis (BTA) was the basis for SPA.50(b). AMC1 SPA.50(b)4a.ii. is an option to mitigate the risk associated with the hazard identified in the BTA. Consulted with HQAC
17	AMC2 SPA.50(b)4.a.iii	HQAC		Replace the existing AMC with: iii. that where the navigation database has expired: (a) an Aircraft must not conduct RNP AR procedures. (b) an Aircraft may operate for up to 28 calendar days after the database expires, except for RNP AR procedures.		DASA has not incorporated the suggestion. In accordance with the Defence FANIP DASA has committed to align with civil PBN requirements SFARP, in this instance CASA requirements. EASA allows 28 days with a number of onerous caveats. DASA has chosen to adopt CASA requirements. Consulted with HQAC

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18	AMC2 SPA.50(b)4.a.iii	HQAC		EASA allows an expired database to be used up to 28 days post expiry, except for RNP AR DEP and APCH. EASA rules seem to apply to both 'MEL' and 'non-MEL' situations. Why has the specific content of the NPA been adopted?		EASA allows 28 days with a number of onerous caveats. DASA has chosen to adopt CASA requirements. LSN 17 refers Consulted with HQAC
19	SPA.50(c)	HQAC		'The MAO must utilise defined define training ….' or: 'The MAO must utilise defined ensure …… Operations are defined IAW DASR AIRCREW.10.'	The words 'utilise defined' do not make sense in this sentence.	DASA incorporated the suggestion. DASA amended SPA.50(c) to read: *(c) The MAO must utilise defined training Currency requirements IAW DASR AIRCREW.10.for all Defence navigation Operations*
20	AMC SPA.50(b) – Navigation equipment and management, monitoring and alerting controls (AUS)	HQACG		The MAO must utilise the navigation equipment and management, monitoring and alerting controls defined in DASA Form 1307 for the relevant navigation approvals. DASR ACXXX/24 provides guidance on form submission including Navigation specification requirements - 'Shortfall Resolution Loop'. Where DASR Form 1307 requirements cannot be met outright by the applicant, the Form supports a 'shortfall resolution loop' in consultation with DASA DeskOs. The applicant must demonstrate that the alternate means of compliance achieves functional equivalence to the published PBN or RVSM standard.		DASA has not incorporated the suggestion. Form 1307 is a living document and the feedback provided shall be forwarded to the developers for their action. Form 1307 is designed to support and assessment of equipment, capability, operational procedures and training to support PBN operations. Where military aircraft do not meet equivalent civil standards then Form 1307 is designed to support the development of workarounds to achieve the functional requirements. These identified workarounds would then be subject to an appropriate risk analysis to support the request for navigational authorisation. The process is designed to provide guidance and support to the MAO undertaking the application process. Consulted with HQACG
21	GM2 SPA.50(b)4 – Navigation database integrity and discrepancies (AUS)	HQACG		There are a lot of varied sources, this AMC, CAOs, RTCA and EUROCAE.	CAO 20.91 says, 'A navigation database for PBN operations must be valid.'	While there are a variety of sources accessible for PBN information, only CASA published sources are used for compliance and assessment purposes. CAO 20.91 Sections (13.9-13.12) provide several caveats for determining whether or not a Navigation database is valid. Specifically, provision is made for an AIRAC change while in flight, provisions for use of an out of date database including a cross check of any data before flight, and provisions for time since expiry that an out of date database can be used. Consulted with HQACG
22		78WG		Nil		DASA noted the feedback
23		81WG		Nil		DASA noted the feedback
24	AMC SPA.50 (a) ii (e) PBN Supplementary capabilities	82WG		Use of suitable area navigation systems on conventional routes and procedures (both en-route and terminal) should be automatically granted with applicable Nav specifications and not required to be applied for.	CASR Part 91 MOS 14.05 now automatically allows use of GNSS as a substitute or alternative to ground-based navigation aids in the following phases of flight provided the corresponding Nav specifications are held.: Enroute - RNP 2 SID STAR - RNP 1 Initial, Intermediate or Missed - RNP 1 Final Approach segment - RNP APCH	DASA decided to require approvals for all RNP Approvals despite CASA recently deciding to only require approval for a limited number of specifications (RNP AR APCH, and RNP 0.3). The CASA PBN approval system has altered over time. Currently, CASA requires TSO equipment and does not permit workarounds. In addition, the aircraft Flight Manual requires a statement that the aircraft is capable of the particular PBN operation. CASA surveillance also includes an annual audit of the Operator's PBN training program. LSN 72 also refers. Consulted with HQACG

LSN	Issued DASR Feedback Reference: (ie DASR number, NPA paragraph etc.)	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
25	AMC SPA.50(b) – Navigation equipment and management, monitoring and alerting controls (AUS)	82WG		AC 001/22 should NOT be removed and should be referred to in the SPA.50 AMC para b via hyperlink	Whilst the Defence FANIP document is logical and reasonable, there seems to be a disconnect between the concepts stated within FANIP and the actual SPA.50. For example, there is no reference in the SPA.50 AMC to AC 001/22 which is fundamental to the concepts described in FANIP, particularly where there are aircraft system shortcomings to be overcome by operational procedures. In fact the Decision Brief at Ref B of the NPA actually refers to the possibility of removing AC 001/22 (see para 3b of BP33738776), and it is also mentioned in Para 3 Footnote 2 of the NPA that AC 001/22 is approved for cancellation. This should not happen!	DASA has not incorporated the suggestion DASA will incorporate all enduring AC 001/22 guidance material into DASPMAN Vol3 which will be published on the same date as DASR SPA.50. Consulted with HQACG
26	AMC1 SPA.50(b)4a.i.(a) - Suitability for Flight (AUS)	82WG		Suggest change "Airspace entry and exit criteria" to "PBN/RVSM airspace, route or procedure operating criteria"	Aircraft don't typically "enter" PBN airspace as such, they typically fly a PBN procedure or route and need to meet PBN criteria to do that . Nor do situations arise where they would need to "Exit" airspace. If you don't meet the PBN criteria you are required to declare that to ATC and/or discontinue the procedure. If this is purely reference to RVSM suggest that is stated	DASA has incorporated the suggestion. DASA amended AMC1 SPA.50(b)4a.i.(a) to read: *PBN, RVSM and NAT HLA Airspace, route or procedure operating criteria* Consulted with HQACG
27	AMC1 SPA.50(b)4a.i.(c)(iii) - Suitability for Flight (AUS)	82WG		Suggest remove consideration of "degraded navigation operations"	This appears to be a double up on "procedures where navigation Operations are not able to sustain promulgated navigation management, monitoring and alerting requirements"	DASA has not incorporated the suggestion. AMC1 SPA.50(b)4a.i.(c)(v) is broader in scope than AMC1 SPA.50(b)4a.i.(a)f. For example, it would include pre-departure requirements for degraded operations into PBN, RVSM or NAT HLA Airspace. Consulted with HQACG
28	AMC1 SPA.50(b)4a.i.(c)(v) - Suitability for Flight (AUS)	82WG		Suggest change "navigational error management pre-Flight and in-flight" to "navigational error management"	If "navigational error management pre-flight" refers to system failures, there are other procedures that deal with that such as MEL requirements and the considerations of the item above. If not, what exactly are navigational errors pre-flight?	DASA has not incorporated the suggestion. As not all Defence aircraft operate with an MEL the AMC provides compliance scope. Navigation errors pre-Flight are any navigation system errors that may impact navigation functions or accuracy. Consulted with HQACG
29	AMC1 SPA.50(b)4a.ii.(b) - Suitability for Flight (AUS)	82WG		Suggest remove "circumstances where exit from the affected Airspace is warranted"	1. The intent of this element of a risk assessment is unclear 2. Situations do not typically arise where aircraft need to "Exit" airspace. If you don't meet the PBN/RVSM criteria you are required to declare that to ATC and/or discontinue the procedure. 3. If this is purely reference to RVSM, suggest that is stated 4. Any risk assessment on navigational failure is going to reference the existing reliability requirements of the navigational specifications or their operational equivalent and the regulation required responses to failures or exceedances (as above). What value is this element of a risk assessment intended to add?	DASA has incorporated the suggestion. DASA amended AMC1 SPA.50(b)4a.ii.(b) (renumbered AMC1 SPA.50(b)4a.ii) to read: ii *risk assessments in accordance with DASR SMS, inclusive of consideration of the scope of Operations for the requested navigation approvals.* LSN 15 also refers. Consulted with HQACG
30	GM SPA.50 (c) GM	82WG		Include RPL for Basic PBN knowledge	GM SPA.50c currently links to the DASA website for recommended training material. Recommend inclusion of RPL for basic PBN knowledge for graduates of basic aircrew courses so that MAO's are not re-training unnecessarily or having to individually determine previous knowledge.	DASA has not incorporated the suggestion. AFTG conducts Basic Aircrew courses that may or may not, currently, meet the requirements for PBN knowledge. If the course does not meet the minimum requirements the MAO must ensure that the required knowledge is obtained. DASA's role in the process is limited to identifying the standard. Consulted with HQACG

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31	GM SPA.50 (c) GM PBN and RVSM Education and Training Guidance for MAOs (BP23732774)	82WG		List of knowledge and competencies is from an unknown source	PBN and RVSM Education and Training Guidance for MAOs (BP23732774) provides a list of competencies quoting CASA Part 121 MOS as a source. 1. Part 121 MOS does not contain this information 2. Part 121 is for "Large Transport Aeroplanes" 3. Why isn't this information being sourced from Part 61, which is where all of the Underpinning Knowledge and Competencies are listed for Instrument Flight? 4. Suggest referencing a standard set of competencies rather than creating another bespoke list - this also assists RPL.	The PBN and RVSM Education and Training Guidance for MAOs is currently under revision. Since it was published, CASA has reviewed or removed several source documents referenced. Part 61 MOS will be included as a reference in the revised document. The example competency statements provided were sourced from two domestic airlines that had developed that guidance from MOS requirements at the time. As stated in the guidance material, the competencies “reflect and supplement” those published by CASA at the time. The statements are not mandatory and are designed to be used by the MAO when assessing their own training materials. Consulted with HQACG
32	SPA.50 (c) GM PBN and RVSM Education and Training Guidance for MAOs (BP23732774)	82WG		Security/ITARS may preclude requirements stated in GM	GM SPA.50c currently links to the DASA website for recommended training material. The document "PBN and RVSM Education and Training Guidance for MAOs" (BP23732774) contains the statement "MAOs must submit training syllabi and training material (eg for computer based training, simulator training, etc) to DASA as part of the Navigation Authorisation assessment." This may not be possible due to security and ITARS requirements for some platforms.	Form 1307 is being revised. The revised document shall address the security and ITARS issues raised. Consulted with HQACG
33	SPA.50 GM	82WG		Where does ADF FLIP fit into the PBN operational document suite?	ADF FLIP is the reference for military operators however it has historically lagged AIP and the broader and military civil regs with respect to PBN. There does not appear to be any reference to ADF FLIP in any of the NPA documentation. Ultimately, this creates another data set of anomalies for MAO's when there are inconsistencies in ADF FLIP between DASA and/or CASA documentation.	Regulation always supersedes any information publication should there be a conflict. DASA is not responsible for FLIP content. Inconsistences identified in FLIP should be notified to, and addressed by AIS-AF. Consulted with HQACG
34	SPA.50 (a)3.	HQAMG		The USAF delegates approval for operations in the NAT HLA to MAJCOMs (AMC/PACAF etc[AMG equivalent]). The NAT OPS manual allows aircraft who are non-equipped to fly through the NAT HLA if they are medevac, SAR or STATE etc. There is an established precedent for State aircraft to not be seeking 'state' approval for operations in the NAT HLA. It is appropriate for the MAO to provide approval and guidance for operations in the NAT HLA, but this should not require regulator approval.		DASA has not incorporated the suggestion. The HQAMG proposal for certification at the MAO level does not effectively take into account the following: 1) Unlike their USAF counterparts, Australia’s geographical location to the North Atlantic makes NAT HLA operations novel for MAOs and crews. 2) Novel operations are exposed to higher risks than normal. 3) SPA.50 mitigates risks by ensuring the following are established by all MAOs conducting Defence navigation Operations: i. Procedures ii. Training 4) In accordance with the Defence FANIP DASA is committed to align with civil airspace requirements SFARP. In the case of NAT HLA operations the civil requirement includes obtaining an approval from the State regulator. 5) DASA approving Defence navigation operations assures Defence leadership that MAOs effectively implemented minimum organisational and operational capabilities. Consulted with HQAMG. Dissenting view recorded.

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35	AMC1 SPA.50(b)4a.ii.	HQAMG		The use of a risk assessment for specific navigation approvals is overkill. Certain airspace has particular navigation equipment requirements. OIP will detail those requirements. NATOPS manual details those requirements for the NAT HLA. Crews will be aware of those requirements from their 'training'. System failures affecting airspace conditions of entry are reported to ATC and they determine if a level change is required. No need for a separate risk management process.		DASA has not incorporated the suggestion Risk assessments are internationally accepted as a means to identify hazards and to assess risks. The DASR risk assessment requirement acknowledges the need to broaden the scope of the civil risk assessment to ensure the identification of hazards unique to Defence PBN operations. To more effectively indicate the risk mitigation controls required, DASA revised AMC1 SPA.50(b)4.a.ii: *risk assessments in accordance with DASR SMS, inclusive of consideration of the scope of Operations for the requested navigation approvals.* LSN 15 also refers Consulted with HQAMG
36	AMC2 SPA.50(b)4a.i.	HQAMG		This requirement sounds like a maintenance / logistics / SPO function. Not suited to an Air Operations regulation. It is like saying the 21J must provide spare parts that are certified fit for purpose.		DASA has not incorporated the suggestion. Experience has demonstrated that an MAO using a database 'certified for purpose' does not ensure that the data generated is fit for the purpose intended. Ultimate responsibility for navigation data loaded into an aircraft rests with the end user. Additionally, maintenance does not always load the database eg away base of the cycle Given that not all MAOs have pre-loaded database capability and others are required to generate waypoint databases it has been decided to retain maintenance for those MAOs where it is applicable. DASA has amended AMC2 SPA.50(b)4a.ii(c): *management, maintenance (where applicable) and verification of navigation databases.* Consulted with HQAMG
37	AMC2 SPA.50(b)4a.ii.(a) and (b)	HQAMG		Why do we need OIP that describes our interface with AIS? Not sure what value is added here.		DASA has not incorporated the suggestion. A review of ASRs covering a multi-year period identified gaps related to navigation data management. The provisions of AMC2 SPA.50(b)4a.i. and ii. are designed to address specific gaps. These provisions are interim controls until a DASA data regulation is released. Consulted with HQAMG

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38	AMC2 SPA.50(b)4	HQAMG		The only sections here which feel relevant to Air Operations are the aircrew procedures for checking database and considerations for operating with expired database. Everything else seems like a Maintenance function which is meant to ensure data loaded onto the aircraft is from an approved source which holds the appropriate accreditations.		DASA has not incorporated the suggestion. 'MAO controls to ensure...' this may end up being a maintenance function. DASR M and 145 are leveraged from EASA/EMARs there is no place for this requirement. Moreover, LSN 36 Given the significant number of data management related ASRs, involving data from approved sources with 'appropriate' qualifications it is not assured the established Maintenance provisions effectively manage all the risks. AMC2 SPA.50(b)4 acknowledges the need for, and benefit of, Operational based skills to complement the established Maintenance based skillsets. LSN 82 also refers. Consulted with HQAMG
39	GM1 SPA.50(b)4	HQAMG		More appropriate to list in ORO.30? There could then be a reference to ORO.30 included within the GM for SPA.50.		DASA has not incorporated the suggestion. The GM emphasises the additional skills and experience FLTAUTHOs require for SPA.50 operations beyond the requirements of ORO.30. ORO.30 requirements can be considered as 'common' to all FLTAUTHOs. Consulted with HQAMG
40		HQAWC		The proposal is acceptable without change.		DASA noted the feedback
41	SPA.50 NPA	HQAFTG		BP35119868	BP35119868 is a copy of the DASR SPA.50 NPA document containing AFTG mark-up in context.	DASA noted the feedback.
42	SPA.50 NPA	HQAFTG		BP35188071	BP35188071 is a copy of DASDRM S3C4 containing review mark-up, particularly relating to the withdrawn CASA AC 91.U series of advisory circulars.	DASDRM S3C4 review is outside of the scope of SPA.50. However, the document with editorial comments has been handed over to the document sponsor (DD DIA). Implementation of the changes is not required before SPA.50 release. Consulted with HQAFTG
43	SPA.50 NPA	HQAFTG		BP35188368	BP35188368 is a mark-up of AC 001-2022 - Defence Navigation Authorisations noting a range of deficiencies in the current guidance and relates to commentary in DASR SPA.50 NPA.	Changes to AC 001/22 will be incorporated during DASPMAN Vol 3 development. Consulted with HQAFTG
44	SPA.50 NPA	HQAFTG		BP35593848	BP35593848 is a mark-up of the DASA Factsheet Aircraft Eligibility for Performance Based Navigation and Reduced Vertical Separation Minimum Operations with AFTG mark-up in review.	Changes to the Factsheet will be incorporated during DASPMAN Vol 3 development. Consulted with HQAFTG
45	SPA.50 NPA DASR GM SPA.50 – REFERENCES FOR PROVIDED GM Table GM SPA.50(a)-1	HQAFTG			CASA AC 91.U-01 v1.0 no longer exists. The CASA ACs 91.U-01 through to AC 91.U-04 were withdrawn in 2021. Although cited as a means of compliance in DASDRM S3C4, AC 91.U-01 through to AC 91.U-04 are not the only sources and DASA should not be continuing	DASA recognises CASA ACs 91.U-01 through to AC 91.U-04 are withdrawn. However, Tables contained within are still considered valuable as guidance. Reference DASDRM S3C4, refer LSN 42. SPA.50 does not refer to any withdrawn CASA documents. Consulted with HQAFTG
46	SPA.50 NPA SECTION 1, Part 1 Area Navigation (RNAV)	HQAFTG		Reword title: '... (from ICAO Annex 6, Part I, 12th Ed Jul 2022)'	Ordinals (i.e. 1st, 2nd, 3rd, etc.) are not presented superscript in government writing.	DASA incorporated the suggestion. DASA amended SPA.50 NPA SECTION 1, Part 1: *Area Navigation (RNAV) (from ICAO Annex 6, Part I, 12th Ed Jul 2022)*

LSN	Issued DASR Feedback Reference: (ie DASR number, NPA paragraph etc.)	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
47	SPA.50 NPA SECTION 1, Part 1 Performance Based Navigation (PBN)	HQAFTG		Reword title: '... (from ICAO Annex 6, Part I, 12th Ed Jul 2022)'	Ordinals (i.e. 1st, 2nd, 3rd, etc.) are not presented superscript in government writing.	DASA incorporated the suggestion. DASA amended SPA.50 NPA SECTION 1, Part 1: *Performance Based Navigation (PBN) (from ICAO Annex 6 Part I, 12th Ed Jul 2022)*
48	SPA.50 NPA SECTION 1, Part 1 Reduced Vertical Separation Minima (RVSM)	HQAFTG		Replace '1,000ft' with '1000 ft'.	No comma nor space in numbers 1000 to 9999 and a non-breaking space between quantity (1000) and unit of measure (ft) IAW National Measurements Act 1960 (NMA). The Australian Government Style Manual in contravention of the NMA prescribes using a comma	DASA incorporated the suggestion. DASA amended SPA.50 NPA SECTION 1, Part 1 Reduced Vertical Separation Minima (RVSM) (from ICAO Doc 9574, 3rd Ed 2012): *Reduced vertical separation minimum of 300 m (1000 ft) between FL 290 and FL 410 inclusive.*
49	SPA.50 NPA SECTION 1, Part 2 CAA GM SPA.50.a	HQAFTG		Delete 'CAA' and use NAA as used elsewhere in DASPMAN.	Why is DASA using CAA in place of NAA in recent NPAs and presumably all of DASPMAN going forward? ICAO does not define nor refer to CAA or civil authority but does refer to the national authority, that is implicitly the national aviation authority (i.e. NAA), in Annex 6 (operations) and Annex 8 (airworthiness), and EASA defines and refers to NAA as does CASA, hence the rationale for DASA using 'CAA' is not immediately apparent.	LSN 5 refers Consulted with HQAFTG
50	GM SPA.50.a	HQAFTG		Delete ', for improved operational effectiveness'.	Not needed and not the only reason.	DASA incorporated the suggestion. DASA amended GM SPA.50a to read: *Defence can utilise PBN, RVSM and NAT HLA when operating in national and international Airspace.*
51	GM SPA.50.a	HQAFTG		Replace: '... requirements—causing reductions in minimum separation from obstacles below safe minima, or with other Aircraft.' with '... requirements, causing reduced separation from obstacles or other Aircraft.'	Simple, plain English. Incorrect use of an em dash. Incorrect use of a comma.	DASA incorporated the suggestion. DASA amended GM SPA.50a. Purpose: *(Hazard) Suitability For Flight can be compromised by inadequate compliance with PBN, RVSM and NAT HLA requirements causing reduced separation from obstacles or other Aircraft.* Consulted with HQAFTG
52	GM SPA.50.a	HQAFTG		Reword: (Defence) This regulation requires MAOs that utilise PBN, RVSM or NAT HLA capabilities to implement defined controls to ensure Suitability For Flight.	The phrase 'choose to' is unnecessary and complicates reading. Any of the three specific activities invoke the requirements for that activity, hence 'or' in place of 'and'.	DASA incorporated the suggestion. DASA amended GM SPA.50a. Purpose. (Context): *(Defence) This regulation requires MAOs that utilise PBN, RVSM or NAT HLA capabilities to implement defined controls to ensure Suitability For Flight.*
53	GM SPA.50.b	HQAFTG		Reword: 'The following additional acronyms and terms are used in DASR SPA.50:'	Delete repeated words 'the following.'	DASA incorporated the suggestion. DASA amended GM SPA.50b: *The following additional acronyms and terms are used in DASR SPA.50:* Consulted with HQAFTG
53 a	GM SPA.50.b	HQAFTG		Flight Level is at least one of the terms included in the list that is not SPA.50 specific. Currently the only use in the DASPMAN Vol 2 but not SPA.50 specific.		DASA has not incorporated the suggestion. The use of Flight Level in DASPMAN Vol 2 is limited to DASR SPA.50 Consulted with HQAFTG
54	GM SPA.50.b	HQAFTG		Reword: * ADS-C Automatic Dependent Surveillance – Contract * A-RNP Advanced Required Navigation Performance * B-RNAV Basic – Area Navigation * CPDLC Controller–Pilot Data Link Communications * P-RNAV Precision – Area Navigation * RNP AR DP RNP Authorisation Required Departure	Spaced en dash not a hyphen. No hyphen or dash in Advanced Required Navigation Performance full text but a hyphen is used in A-RNP. Spaced en dash. Unspaced en dash links two equal terms: Controller–Pilot. Spaced en dash RNP AR DP is the correct shortened form.	DASA incorporated the suggestion.

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55	GM SPA.50.b	HQAFTG		Review for including: * GBAS Ground Based Augmentation System * WAAS Wide Area Augmentation System in GM SPA.50b	List provides SBAS but SBAS is only one of the WAAS systems.	DASA has not incorporated the suggestion. Space Based Augmentation System (SBAS) is the overarching term used for satellite augmentation. WAAS is the US implementation of SBAS. Consulted with HQAFTG
56	GM SPA.50.b	HQAFTG		Calendar day belongs in the Glossary not GM SPA.50.b	Calendar day relates to the minimum equipment list (MEL). MEL is in several other DASR (e.g. DASR M, DASR SPA.40, Consequently, calendar belongs in the Glossary and not SPA.50.	DASA has not incorporated the suggestion. The term Calendar day is not utilised in any other DASR Part. Consulted with HQAFTG
57	GM SPA.50.b Navigation specification	HQAFTG		Replace 'e.g.' with 'eg'.	As provided in multiple prior returns, the Australian Government Style Manual prescribes using full stops in Latin abbreviations as used here. In contrast, and consistent with general rules for abbreviations, the Australian Defence Force Writing Manual prescribes	DASA incorporated the suggestion.
58	SPA.50(a)	HQAFTG		Reword: 'The MAO must obtain approval IAW DASR ARO.100 for the following Defence navigation Operations:	Stating 'DASA approval' is redundant when also including 'DASR ARO.100' which automatically invokes DASA approval.	DASA incorporated the suggestion. DASA amended SPA.50(a): *The MAO must obtain approval IAW DASR ARO.100 for the following Defence navigation Operations:* Consulted with HQAFTG
59	AMC SPA.50(a)	HQAFTG		Do not agree with: * AMC SPA.50(a)b.i(a) to (g) * AMC SPA.50(a)b.i(j) * AMC SPA.50(a)b.ii(a) * AMC SPA.50(a)b.ii(e) requiring DASA approval. ICAO Annex 6, as invoked by EASA, FAA, UK CAA and CASA (the principal NAAs for DASA benchmarking), the navigation specifications in AMC SPA.50(a)b.i(a) to (g) do not require specific approval. Why does DASA require DASA approval for these PBN operations?	AMC SPA.50(a)b.i and ii contain unnecessary regulation that is not consistent with DASPMAN Vol 1, Part 3, para 6: In conducting its functions, DASA must have regard to international best practices in military Aviation Safety, including those established by: a. the European Military Airworthiness Requirements (EMAR) b. the principles of the International Civil Aviation Organisation [sic] (ICAO) Standards and Recommended Practices (SARPs). c. the Civil Aviation Safety Regulations (CASR) d. the European Union Regulations developed by the European Aviation Safety Authority (EASA)	1. The requirements to operate in the NAT HLA are addressed in (ICAO) Nat Doc 007 North Atlantic Operations and Airspace Manual. CASA authority and responsibilities extend to international operations of Australian registered aircraft. Like CASA, Defence operations within NAT HLA are required to meet Nat Doc 007 requirements. 2. DASA has decided to require approvals for all RNP Approvals despite CASA recently deciding to only require approval for a limited number of specifications (RNP AR APCH, and RNP 0.3). The CASA PBN approval system has evolved over time. Currently, CASA requires TSO equipment and does not permit workarounds. In addition, the aircraft Flight Manual requires a statement that the aircraft is capable of the particular PBN operation. CASA surveillance also includes an annual audit of the Operator's PBN training program. The Defence navigation approval system provides flexibility which is not provided under the CASA system. 3. Additionally, the FANIP (endorsed by ENVR CMDs) states 'the Australian Government National Aviation Policy White Paper (Ref B) notes that Defence, in collaboration with Airservices Australia (AsA), is committed to improving civil and military aviation harmonisation and to enhancing better airspace access arrangements. Consulted with HQAFTG. Dissenting view recorded.

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60	AMC SPA.50(a)a	HQAFTG		If the OpSpec variation request is solely related to a new or revised navigation approval, then DASR Form 1307 should be designed to negate the requirement for the additional submission of DASR Form 139a in this specific instance.	Form 139a is a generic form for seeking an OpSpec variation; however, if we have a specific form for navigation approvals, then that should be the only form required in this instance. Reducing the number of forms required should be an objective.	DASA has not incorporated the suggestion. ARO.100(c) requires the applicant organisation to submit a Military Air Operator's Operations Compliance Statement (OCS) for issue of a variation to, a MAOC or attached Operations Specification (OpSpec). The OCS provides the cross-reference between all applicable DASR and the relevant MAO instructions. The OCS would therefore need to be updated by the MAO as a result of the local instruction changes required following the addition of navigation approvals. The OCS is used by DASA to update the OpSpec. Form 1307 is the 'checklist' means by which the MAO documents compliance with requirements for the navigational approval sought. DASA requires Form 139 to summarise the MAO-initiated revisions to instructions listed in the OCS (in this case, due to the new navigation approvals) to assess regulatory compliance and to issue/amend the OpSpec. DASA plans to review Form 139a during the shift A1 ARO.100 update. At the next SPA.50 update DASA intends to address the requirement to submit Form 139a when Form 1307 is used. Consulted with HQAFTG
61	AMC SPA.50(a)b.i(a) Table GM SPA.50(a)-1, LSN 3, 4 and 5	HQAFTG		Replace 'RNAV 10 / RNP 10' with 'RNAV 10 (RNP 10)'.	CASA incorrectly uses a forward slash when writing what should be written as RNAV 10 (RNP 10). ICAO DOC 9613 designates the navigation specification RNAV 10 (RNP 10), which is what DASA (and CASA) should be using.	DASA incorporated the suggestion. DASA amended AMC SPA.50(a)b.i(a) and Table GM SPA.50(a)-1:: *(a) RNAV 10 (RNP 10)* *LSN 3, 4 and 5 RNAV 10 (RNP 10)*
62	AMC SPA.50(a)b.i(k)	HQAFTG		Replace 'RNP AR DEP' with 'RNP AR DP'.	DP is the ICAO, EASA, FAA and CASA abbreviation for departure procedure.	DASA incorporated the suggestion. DASA amended AMC SPA.50(a)b.i(k): *RNP AR DP*
63	AMC SPA.50(a)b.ii(a)	HQAFTG		Replace 'APV / Baro-VNAV' with 'APV Baro-VNAV'	Incorrect use of a forward slash. Baro-VNAV is a type of APV, the same as are LNAV/VNAV and LPV types of APV.	DASA incorporated the suggestion. DASA amended AMC SPA.50(a)b.ii(a): *APV Baro-VNAV*
64	AMC SPA.50(a)b.ii(b) to (d)	HQAFTG		Reference Radius to Fix (RF), Fixed Radius Transition (FRT) and Time of Arrival Control (TOAC) back to A-RNP requirements.		DASA has not incorporated the suggestion. As A-RNP signifies a combination of specifications, it may include some of the supplementary capabilities in AMC SPA50(a)b.ii(b) but it is not itself a supplementary capability. Consulted with HQAFTG
65	GM SPA.50(a)	HQAFTG		Replace 'approvals' with 'specifications'.	The table is a table of specifications not approvals.	DASA incorporated the suggestion. DASA amended GM SPA.50(a) (renumbered GM2 SPA.50(a)): *Defence navigation approval and specifications in context (AUS)*
66	GM SPA.50(a)a	HQAFTG		Reword: 'a. Table GM SPA.50(a)–1 lists typical navigation Operations and the corresponding navigation specification.'	Unspaced en dash not a hyphen in the table designator. The table is a table of specifications not approvals. Their relates to people and is use both incorrectly and unnecessarily when 'the' works just fine.	DASA incorporated the suggestion. DASA amended GM SPA.50(a) (renumbered GM2 SPA.50(a)): a. *Table GM SPA.50(a)–1 lists typical navigation Operations and the corresponding navigation approvals and specifications.* The table header has also been revised to reflect the change in wording.

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67	Table GM SPA.50(a)-1 heading	HQAFTG		Replaced table designation with 'Table GM SPA.50(a)–1' (unspaced en dash not hyphen) and reword title:	Correct format of a table designation. The table is a table of navigation specifications not approvals.	DASA incorporated the suggestion. DASA amended GM SPA.50(a) (renumbered GM2 SPA.50(a)): a. *Table GM SPA.50(a)–1 lists typical navigation Operations and the corresponding navigation approvals and specifications.*
68	Table GM SPA.50(a)-1	HQAFTG		Replace table headings: 1. LSN 2. Typical navigation operations 3. Applicable navigation specifications	Table headings only capitalise the first word and proper nouns. None of the heading words are proper nouns in this instance, hence lowercase.	DASA incorporated the suggestion. DASA amended GM SPA.50(a)–1, (renumbered GM2 SPA.50(a)–1) table headings: *LSN* *Typical Defence navigation operations* *Applicable navigation approvals and specifications*
69	Table GM SPA.50(a)-1	HQAFTG		Add 'RNP AR DP' in appropriate locations.	Table is absent RNP AR DP.	DASA incorporated the suggestion. DASA amended Table GM SPA.50(a)-1. (renumbered GM2 SPA.50(a)–1). LSN 2 RNP AR APCH has been amended to 'RNP AR' which includes RNP AR APCH and RNP 'AR DEP.'
70	SPA.50(a)1	HQAFTG		Reword: Performance Based Navigation using the following specifications: a. A-RNP b. RNP0.3 c. RNP AR (APCH or DP)	Do not agree that all PBN requires DASA approval; only those requiring Specific Approval IAW ICAO Annex 6 require Authority approval. Those are the Authorisation Required PBN as detailed in, for example, CAO 20.91 and AC 91.05 v1.0, vis: * RNP AR APCH * RNP 0.3 * A-RNP.	DASA has not incorporated the suggestion. LSN 72 refers. Consulted with HQAFTG
71	AMC1 SPA.50(b)4.a.i(c)(ii)	HQAFTG		Replace: Minimum Equipment List (MEL) requirements, or equivalents with Minimum Equipment List (MEL) or equivalent requirements	Grammar.	DASA incorporated the suggestion. DASA amended AMC1 SPA.50(b)4.a.i(c)(ii): *Minimum Equipment List (MEL) requirements, or equivalent requirements*
72	AMC2 SPA.50(b)4a.ii.	HQAFTG		Expired database EASA (CAT.OP and SPA) and UK CAA permit operating in non – specific approval (SPA) operations (RNAV10 to RNP APCH) for up to 28 days with an expired database; and not to operate with an expired database at all for approval required (RNP AR APCH, RNP0.3 and, by extrapolation, RTF and NAT HLA). FAA dealing with international operations, which appears to be centred on the NAT HLA needs, prescribes not at all except IAW the MEL. Specific Approval EASA, UK CAA authority approval is less restrictive than that proposed in DASR SPA.50. CAO 20.91 authority approval is required for: • RNP 0.3 navigation authorisation • RNP AR navigation authorisation • Advanced RNP navigation authorisation • Fixed Radius Transitions navigation authorisation which, with more detail, parallels EASA and UK. CASA separately to CAO 20.91 identifies, as do the other jurisdictions, authority approval for NAT HLA and RVSM.	To end So, CASA, EASA and UK do not require specific approval for RNAV10 down to RNP APCH, including Baro-VNAV, LP, LPV, LNAV-VNAV, everything other than RNP AR APCH and RNP0.3. The authority approval is invoked for non-SPA operations for approval of the aircraft when an operator claims to have a suitable aircraft that is not evident from the certification baseline. Only the aircraft, not the operation of the aircraft, is then requiring approval, and I am drawing from CAO 20.91 in that respect. That is reflected in the ADRM that I note points to no-longer existent CASA AC 91.U, perhaps withdrawn with the 2018 update to CAO 20.91? Two questions arise: 1. Naturally CASA can regulate Australian registered aircraft to 3 d, 72 h per CAO 20.91 but can CASA extend that to operating internationally in NAT HLA (presumably the CASA NAT HLA specific approval comes with further restrictions and DASA would need to do the same)? 2. Why would we make RNAV and PBN operations that are not SPA operations in civilian contexts, including CASA, SPA in DASR? Addition question: During consult 3. What is the origin of the CASA 3 day requirement	1. The requirements to operate in the NAT HLA are addressed in (ICAO) Nat Doc 007 North Atlantic Operations and Airspace Manual. CASA authority and responsibilities extend to international operations of Australian registered aircraft. Like CASA, Defence operations within NAT HLA are required to meet Nat Doc 007 requirements. 2. DASA has decided to require approvals for all RNP Approvals despite CASA recently deciding to only require approval for a limited number of specifications (RNP AR APCH, and RNP 0.3). The CASA PBN approval system has altered over time. Currently, CASA requires TSO equipment and does not permit workarounds. In addition, the aircraft Flight Manual requires a statement that the aircraft is capable of the particular PBN operation. CASA surveillance also includes an annual audit of the Operator's PBN training program. 3. Reference CASA CAO 20.19: 13.11 (72 hours non MEL) and 13.12 (3 flight days MEL) Reference Civil Aviation Advisory Publication CAAP 37-01 V5.1 Minimum equipment lists (MEL) 4.5.3 Category B: Items in this category are to be repaired within three (3) consecutive calendar days (72 hours) excluding the day the malfunction was recorded in the aircraft maintenance release or other approved document. Consulted with HQAFTG

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73	AMC1 SPA.50(b)4.a.ii(a)	HQAFTG		Reword: 'consideration of the scope of Operations for the navigation specification'	Not all navigation specifications need approval but all navigation specifications require risk management.	DASA has not incorporated the suggestion. LSN 72 refers Consulted with HQAFTG
74	AMC2 SPA.50(b)4.a.ii(a)	HQAFTG		Replace 'Aeronautical Information Service–Air Force (AIS-AF)' with 'Aeronautical Information Service – Air Force (AIS-AF)'	Spaced en dash not hyphen in 'Aeronautical Information Service – Air Force'; however, a non-breaking hyphen (CTRL SHIFT -) in 'AIS-AF'.	DASA incorporated the suggestion. DASA amended AMC2 SPA.50(b)4.a.ii(a): *descriptions of MAO interfaces to, and product from, applicable commercial navigation database providers and the Aeronautical Information Service – Air Force (AIS-AF)*
75	AMC2 SPA.50(b)4.a.iii(a)	HQAFTG		Reword: 'an Aircraft that is operated IAW a MEL (or equivalent) that includes navigation database relief may operate for a period IAW the MEL.'	The MEL specifies the criteria so there is no need to prescribe in the AMC for the navigation operations what are the criteria to be in the MEL. EASA and UK CAA permit operating up to 28 days with an expired database for not authorisation required PBN and not to operate after DB expiry for authorisation required PBN.	DASA has not incorporated the suggestion. Defining the three-day period in SPA.50 ensures MEL relief is no greater than three days. LSN 17 also refers. Consulted with HQAFTG
76	AMC2 SPA.50(b)4.a.iii(b)	HQAFTG		Does DASA know the basis for CASA describing this in CAO 20.91 and is it valid? Why does DASA limit the operation to 72 h or 3 days IAW CAO 20.91 and not the benchmark NAAs?	EASA and UK CAA permit operating up to 28 days with an expired database for not authorisation required PBN and not to operate after DB expiry for authorisation required PBN.	LSN 17 and LSN 72 refer Consulted with HQAFTG
77	AMC2 SPA.50(b)4.b	HQAFTG		Reword: RTCA DO-200 or EUROCAE ED-76	Must not use a forward slash in place of a conjunction. Whilst the NAAs and ICAO commonly write RTCA DO-200/ EUROCAE ED-76, it is nevertheless incorrect. The RTCA DO-200 and EUROCAE ED-76 are two separate standards that are equivalent and interchangeable hence either one (or) may be used to define the standard for the aeronautical database.	DASA incorporated the suggestion. DASA amended AMC2 SPA.50(b)4b.: *Navigation data should satisfy the requirements of RTCA DO-200 or EUROCAE ED-76 (latest revisions) for the requested navigation approvals and routes, and be compatible with the intended function of the Aircraft equipment used.*
78	GM1 SPA.50(b)4	HQAFTG		Reword: '... FLTAUTHOs should self-assess their competency to conduct the FLTAUTH for the navigation Operations being authorised, inclusive of potential abnormal or alternate procedures required.'	The words 'whether they hold' are unnecessary.	DASA incorporated the suggestion. DASA amended GM1 SPA.50(b)4: *FLTAUTHOs should self-assess their competency to conduct the FLTAUTH for the navigation Operations being authorised, inclusive of potential abnormal or alternate procedures required.*
79	SPA.50(c)	HQAFTG		Reword 'The MAO must utilise defined training and Currency requirements IAW DASR AIRCREW.10 for all Defence navigation Operations'	Not all navigation operations need approval but all navigation operations require training and currency requirements. Training and currency requirements are IAW Aircrew.10: navigation operations are not IAW Aircrew.10.	DASA incorporated the suggestion. DASA amended SPA.50(c): *The MAO must utilise defined training and Currency requirements IAW DASR AIRCREW.10 for all Defence navigation Operations.*
80		HQFAA		The proposal is acceptable without change		DASA noted the feedback
81	SPA.50(c)	AVNCOMD		Is this not already covered under DASR Aircrew.10(a)8? Is this different or in addition to?		DASA incorporated the suggestion. DASA amended SPA.50(c) and withdrew the AMC: *'The MAO-AM must define training and Currency requirements for all DASA-approved MAO Defence navigation Operations IAW DASR AIRCREW.10.'* Post Pre NPA DASR SPA.50(c) has been further revised: *The MAO must establish and implement training and Currency requirements for all DASA-approved Defence navigation Operations IAW DASR AIRCREW.10 .*

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82	SPA.50(b)	AVNCOMD		Why are these requirements being created under the 'MAO' rather than covered under Initial and Continuing Airworthiness (MTCH approval) which is what these requirements sound like?	A wording change could be more appropriate to specify these MAO requirements are for OpSpec variations not MTCH approval.	DASA incorporated the suggestion. DASA AC 001/2022, and DASA Factsheet – Aircraft Eligibility for PBN and RVSM Operations (BP26441788 of Aug 22) refer. Normally, Aircraft eligibility to support Performance Based Navigation (PBN), Reduced Vertical Separation Minima (RVSM), and North Atlantic - High Level Airspace (NAT-HLA) navigation approvals under DASA AC 001/2022 is managed through acquisition (initial airworthiness and continued airworthiness) requirements, ie Part 21 initial acquisition Military Type Certificate (MTC) processes. However, similar to the civil approach for the approval of these navigation operations, the onus is on the MAO that desires to conduct these operations to demonstrate that their Aircraft Type and FMS meet the requirement of the chosen navigation operation. In particular, PBN, RVSM and NAT-HLA on-board system certifications are not yet standard for military Aircraft. The MAO is therefore expected to demonstrate that their Aircraft is 'capable' of supporting these navigation operations before DASA will provide OpSpec approval to do so. This approach was used for previous Army PBN approvals, whereby MAO consultation with the MTC Holder was required to gain the necessary evidence. Consulted with HQ AVNCOMD
83	AMC SPA.50(b)a	AVNCOMD		Should' seems to be inconsistent with 'must' and the requirements of this part of the regulation. Is it appropriate to grant an MAO latitude to use different equipment than specified in Form 1307?		DASA has not incorporated the suggestion. Civil Air Operator approval of navigation operations is based on their outright compliance with ICAO and relevant NAA regulations and guidance. Defence (ie state) aircraft are not bound by ICAO or the Civil Aviation Act 1988 (Cth). However, Defence aircraft need to regularly utilise both domestic and international civil and military airspace for their Defence roles; and Defence, in collaboration with Airservices Australia (AsA), is committed to improving civil and military aviation harmonisation and to enhancing better airspace access arrangements. Therefore, DASA, through AC 001/2022, has implemented a navigation approval process that has adapted the civil implementation approach. Where defensible, Defence will support functional equivalence assessments for military systems which may be non-compliant with specified civilian navigation standards and outcomes. This contemporary Defence approach levies 'must' requirements on MAOs at DASR part level (to meet international obligations), but provides flexibility in AMC for MAOs to use alternate approaches (AltMOC) to the DASR Form 1307 discussed. Note that DASA considers DASR Form 1307 simplifies MAO compliance checks and functional equivalence assessments, however the MAO has latitude to provide AltMOC if considered appropriate. Consulted with HQ AVNCOMD
84		AVNCOMD		(Other than the matters raised in the Pre NPA process) AVNCOMD 'is accepting of these changes with a caveat for resources required:'		DASA noted the feedback. Consulted with HQ AVNCOMD
85	AMC2 SPA.50(b)4	AVNCOMD		Compliance with AMC2 SPA.50(b)4 – Navigation database integrity (AUS): likely a contractual change with Sigma Bravo:'	our current Level 2 data provider will be required to a. become certified under DO-200B as a Certified Level 2 data provider in order to reduce risk by meeting contemporary standards: training and certification costs as yet unquantified b. Conduct ongoing maintenance: additional costs as yet unquantified. c. Adequate time and funding would be required to enact this change and maintain certification – unquantified but likely to affect JC2SPO for RAAF platform also'	Requirements are not established in SPA.50 for the certification of a Level 2 data provider. Consulted with AVNCOMD

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86		AVNCOMD		We acknowledge the 12 month implementation period which will be necessary at a minimum if the above are to be addressed and resources obtained as required.'		DASA noted the feedback that PBN approval has already been obtained for part of the fleet and approval for an additional type will be sought in 2024. Consulted with HQ AVNCOMD
87	SPA.50(b)	DG DASA		Concerns are associated with the intent of SPA.50(b) 1, 2 and 3 and the lack of GM/AMC that stitches in applicable Initial Airworthiness DASR. Additional context: • SPA.50(b) 1 and 2 appear to be ostensibly the same, and in the absence of GM or AMC, can be interpreted as the applicable standard/ TSO (or equiv) listed in the Navigation specification. Clearly this would be at odds with the intent of GM1 SPA.50(a) – Defence navigation approvals (AUS), which allows flexibility in addressing explicit shortfalls of equipage performance (against certification standards) with operational controls that collectively result in an ELOS (Equivilant Level Of Safety).	My takeaway is that the proposed regs SPA.50 (b) 1-3 require some rework – which may include simplification of the regulation itself; additional GM/AMC; or both. I will be comfortable with a solution developed in consultation and agreement with DIA (as the custodians of the TC process).	*DASA amended SPA.50(b) to remove duplication and simplify SPA.50(b) as suggested:* 1. SPA.50(b)2 was removed in toto due to duplication of intent with SPA.50(b)1. 2. SPA.50(b) has been amended to read: *The MAO must utilise navigation equipment and management, monitoring and alerting controls for Defence navigation Operations defined at DASR SPA.50(a), that:* *1. complies with initial Airworthiness and Aircraft eligibility* *2. ensures operations will not compromise Suitability For Flight.* 3. DASA added GM SPA.50(b) for additional guidance on the use of Form 1307 to gain navigation approvals, including flexibility provisions. The added GM SPA.50(b) also addresses the feedback that SPA.50(b)1 and 2 are at odds with GM1 SPA.50(a) as follows: *DASA Form 1307-Application for Navigation Specification Approval (AUS)* *a. MAOs should submit a completed DASR Form 1307 for Defence navigation approval requests. DASA assesses the evidence MAOs submit for each specification approval sought against the eligibility requirements. The eligibility requirements include technical and operational components.* *b. MAOs, that cannot meet Aircraft eligibility requirements outright, may demonstrate alternate compliance via DASR Form 1307.* *4. DASA added DIA suggested AMC and GM to define how initial Airworthiness and Aircraft eligibility is normally achieved. DASA added AMC SPA.50(b)1 as follows:* *AMC SPA.50(b).1. – Demonstration of compliance for Aircraft Eligibility (AUS)* *a. Equipage Requirements. The level of equipage provided to meet aircraft eligibility requirements must be included in the TCB.* *b. Demonstration of Compliance. Demonstration of compliance with Aircraft Eligibility requirements can be met IAW AMC to DASR 21.A.20 through either:* *i. Compliance Demonstration evidence developed by a MDOA holder (or alternative as agreed by the Authority); or* *ii. through appropriate evidence of prior certification provided by another CAA / MAA.*

LSN	Issued DASR Feedback Reference: (ie DASR number, NPA paragraph etc.)	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
						5. DASA added GM1 and GM2 SPA.50(b)1 as follows: GM1 SPA.50(b).1. – Demonstration of compliance for Aircraft Eligibility (AUS) If approval is being sought as part of initial Aircraft acquisition, aircraft eligibility will be documented in the aircraft TCB and TCDS when the MTC is issued. Where a Defence aircraft has not previously been certified for PBN or RVSM, a major change to Type Design will be required, to update the aircraft's Type Certification Basis (TCB). Supplementation may be required to include equipage requirements, and will be implemented through agreed tailoring. See AMC1 to DASR 21.A.17A. GM2 SPA.50(b).1. – Alternate means of demonstrating compliance Defence aircraft, in particular aircraft which are not civil derivative, will not often be able to achieve strict compliance with the civil PBN and RVSM requirements. In this case, an alternative means of establishing compliance with the civil standards, in which equivalent performance outcomes are demonstrated, may be acceptable to the Authority. These alternate means will achieve an equivalent level of safety and will be implemented through agreed tailoring to the TCB documented by MCRI. See AMC1 to DASR 21.A.17A. Consulted with DIA.
88	SPA.50(b)3	DG DASA		• SPA.50(b) 3 appears to be redundant on the basis of Initial and Continuing Airworthiness regulations. For example, the concept of Certificates of Airworthiness, and associated Military Airworthiness Reviews, automatically ensure that individual aircraft continue to comply with the approved Type Design (per the MTC and TCDS).		DASA incorporated the suggestions. DASA deleted original SPA.50(b)3 in toto and renumbered original SPA.50(b)4 as SPA.50(b)2. Consulted with DIA.