



DEFENCE AVIATION SAFETY AUTHORITY

**COMMENT RESPONSE DOCUMENT TO
NPA 2022-019 – DASR ABM AIR BATTLE MANAGEMENT**

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 2022-019, 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 2022-019 (*DASR ABM Air Battle Management*) for regulated community comment on 11 Aug 23. The period for public comment closed on 8 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 181 comments in response to NPA 2022-019. 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 2022-019 as follows:

- a. HQ AVNCOMD advised the proposal was acceptable
- b. HQAC advised the proposal was acceptable, but would be improved if DASA made the changes detailed in Annex A
- c. HQFAA, advised the proposal was not 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 2022-019.

7. **Transition plan.** DASA incorporated a transition plan with the creation of *DASR ABM*. In this plan, DASA will provide a 12 month transition period, commencing on the date of publication of *DASR ABM*. This transition period will allow the regulated community to make the necessary changes to their management systems. DASA will not enforce compliance with

DASR ABM 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 2022-019: *DASR ABM Air Battle Management* – Regulated Community Feedback

Comment Response Document

DASR ABM Air Battle Management

LSN	NPA Feedback Reference: (ie Regulation number, NPA paragraph etc)	Unit	Unit: Comment or suggested change	Unit: Further Explanation where provided	Hyperlink for Unit	Issue Type Raised Editorial Definition Clarification (Qn) Education	Status Open Ready for DD Consult Closed	DD Cleared	DASA Actions	DASA Response DASA incorporated the suggestion, XXX has been updated as follows DASA has not incorporated the suggestion. (why not)
1	Glossary ABMO	SRG	A generic term for an organisation certified by a Military Aviation Authority (MAA) to conduct Air Battle Management Operations.	Reference to CAA is not applicable for a pure military function. Use of the term 'service' is not consistent with the other glossary terms. Ross		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
2	ABM.10	SRG	Amend final sentence: (Defence) This regulation requires ABMOs to ensure ABM operations are conducted safely by an approved organisation.	More concise Ross		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA amended GM ABM.10 as follows: <i>This regulation requires an Air Battle Management Operator (ABMO) to ensure Air Battle Management Operations (ABMOps) are conducted safely by an approved organisation.</i>
3	ABM.60 (a) AMC	SRG	Specifically, a. v. (g) sub-para 5. software safety assurance in accordance with applicable industry standards. 6. defect and unserviceability reporting. Consider removing.	Request ABM.60(a)(a)v(g) to be covered in AMC ABM.70(a) – Equipment, Systems and Installations (AUS). Clarke		Clarification	Ready for DD	yes	closed	DASA has not incorporated the suggestion. ABM.60 requires authorised documentation and ABM.70 requires you manage equipment law that documentation. AMC ABM.60(a).v.(g) = AMC ABM.70(a).a 1 a.i 2 a.ii 3 a.iii 4 b 5 c 6 d
4	ABM.70 (a)	SRG	Amend: Was: AMBOs must ensure that ABM Equipment, systems and installations meet and are maintained to applicable industry standards; and support the safe conduct of ABM operations. Proposal: AMBOs must ensure that ABM Equipment, systems and installations meet and are maintained to agreed standards; and support the safe and effective conduct of ABM operations.	ANSP.70(a) reads: "An Air Navigation Service Provider must ensure that equipment, systems and installations meet agreed standards and support the safe and effective provision of service." In contrast: ABM.70(a) reads: "ABMOs must ensure that ABM Equipment, systems and installations meet, and are maintained to, applicable industry standards; and support the safe conduct of ABM operations." In the same way that agreed standards are applicable to ANSP, it makes sense that ABM standards are agreed via a DoSA function for ABM. The standards applied between Wakulda, E-7A, potentially OTHR and future AIR6500 deliverables needs to be managed by a DoSA to assure the capability is managing the interface control. In the same way that effective provision of service is applicable to the ANSP, it follows that this regulatory requirement should therefore be applicable to ABM. Douglas & Scott		Clarification	Ready for DD	Yes	Closed	DASA has not incorporated the suggestion. DASA has removed the content of ABM.70 and replaced it with 'RESERVED'. LSN 178 refers
5	ABM.70 (a) AMC	SRG	Amend: To align with key tenants in the AMC for ANSP.70(a), specifically: AMC paragraphs 1.(b), (c), (d), (f), (g), 2. 3.(a), (b), (c), 6	In the same way that effective provision of service is applicable to the ANSP, it follows that this regulatory requirement should therefore be applicable to ABM, and therefore AMC should be updated for improved alignment. Douglas		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated AMC ABM.70(a) as follows: <i>AMC ABM.70(a) – equipment, systems and installations (AUS)</i> <i>a. Equipment, systems and installations should be designed, manufactured, installed, calibrated, commissioned and modified to ensure they:</i> <i>i. are fit for their intended purpose;</i> <i>ii. meet the required safety targets for any foreseeable operating conditions and for their whole operational life</i> <i>iii. meet applicable safety requirements</i> <i>iv. account for limitations related to human capabilities and performance</i> <i>v. are protected from internal and external threats that may be harmful to their operation.</i> <i>b. The ABMO should manage ABM equipment, systems and installations in compliance with appropriately authorised:</i> <i>i. OEMs' design specifications</i> <i>ii. operating and installation instructions</i> <i>iii. ongoing maintenance requirements and instructions.</i> <i>c. For the introduction of new equipment, the ABMO should utilise processes for managing the risk of interference or ineffective interoperability, with:</i> <i>i. other ABMO equipment</i> <i>ii. aircraft, ships, Tactical Air Control Parties, Integrated Air and Missile Defence elements, and the AOC.</i> <i>d. Distribution of information. Where an ABMO distributes information to users, they should:</i> <i>i. confirm the accuracy, sufficiency, completeness and currency of the distributed information, including the source of such information, before such information is distributed;</i> <i>ii. distribute the information in a suitable format for users</i> <i>iii. ensure that information is distributed and updated in a timely manner</i> <i>iv. use reliable means of communication protected from interference and corruption.</i> <i>e. Software. The ABMO should implement software safety assurance in accordance with applicable industry standards.</i> <i>f. Reporting. The ABMO should perform defect and unserviceability reporting of equipment, systems and installations.</i> <i>g. Managing changes to equipment, systems and installations. An ABMO should have procedures for managing safety when introducing new or modifying existing equipment, systems and installations, and their support arrangements.</i>

6	ABM.70 (a) AMC	SRG	Amend: ABM 70(a) AMC (C) Was: Software. ABMOs should implement software safety assurance in accordance with applicable industry standards . Proposal: Software. ABMOs should implement software safety assurance that meets the agreed standards acceptable to the authority.	Note as context to AMC request above. Software assurance is becoming and increasing focus area for extant ABM designs in the ground based Wakulda, mobile capability, E-7A, OTHR and IAMD designs. As the operational context evolves and threats increase in complexity and speed of development, the ABMO and its support network needs a Delegate of the Safety Authority (DoSA) to capture extant standards, promulgate the agreed standards in concert with DIA and then develop the ADRM chapter or equivalent to grow the ABM equipment with AIR6500 for future deliveries. Scott		Clarification	Ready for DD	Yes	Closed	DASA has not incorporated the suggestion. DASA has removed the content of ABM.70 and replaced it with 'RESERVED'. LSN 178 refers
7	ABM.70 (b)	SRG	Amend: Was: DASR ABM.70(a) does not apply to equipment and systems permanently fitted to an Aircraft and managed under DASR21J requirements. Proposal: For equipment and systems permanently fitted to an aircraft the DASR 21J is to be used in lieu of these regulations.	Rather than an exception, provide a positive statement that a DASR21 compliant system meets the intent of ABM.70(a). See below for proposed AMC. Madsen/Douglas/Scott		Education	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. The current wording is standardised for exceptions to the regulations. agreed for closure by DLC 5 Oct
8	ABM.70 (b)	SRG	Amend: Was: Equipment and systems permanently fitted to... Proposal: AMC - Wherever the Fit, Form and/or Function of systems are managed under DASR21J requirements, this can be claimed as an AMC to ABM.70(a).	Clearly the fit and form is covered under the initial and continuing airworthiness aspects of the DASR21J for items fitted to an aircraft. However: (1) There may also be systems not fitted to an aircraft that are also managed under the exact same 21J engineering framework (i.e. missing planning systems). (2) Specifically the ABM 'function,' generally software-based, is not regulated under DASR21J, and so therefore there may retain applicability under ABM.70(a) - i.e. for the RAAF E-7A ABM Mission System. Douglas		Clarification	Ready for DD	yes	closed	DASA incorporated the intent of the suggestion. DASA has updated ABM.70(b) as follows: <i>(b) As an exception, DASR ABM.70 (a) does not apply to equipment and systems managed under DASR 21 requirements.</i> DASA also updated DASR ABM.70(a) as follows: <i>to ensure that the scope of the equipment regulated under DASR ABM is defined:</i> <i>(a) An ABMO must ensure that:</i> <i>1. the ABM equipment, systems and installations used by the ABMO to provide ABMOps are defined.</i> <i>2. ABM equipment, systems and installations meet, and are maintained to, applicable industry standards; and support the safe conduct of ABMOps.</i> <i>(1) Systems not fitted to an aircraft that are managed under the same 21J framework work meet the requirements of ABM.70(a)</i> <i>(2) If the aircraft ABM mission software is not managed under 21J then this regulation applies</i>
9	ABM.80	SRG	Proposed name change. Was: Categorisation and Competency Management (ASU) Proposed: Personnel Competency and Categorisation (AUS)	The specific focus on Categorisation and Competency limits any ability to discuss the engineering, maintenance competency and qualifications. As per ANSP 80 the regulation title is a cue to the reader of the content. The regulation ABM.80(a) reads well and doesn't need to change to incorporate engineering and maintenance. See proposed AMC below to include engineering and maintenance language. Scott		Editorial	Ready for DD	Yes	closed	DASA partially incorporated the suggestion. DASA has updated ABM.80 to 'Competency management (AUS)' LSN145 also refers
10	ABM.80 AMC	SRG	AMC ABM.80(a) Propose keeping a and cue the reader to manage personnel competency and categorisation IAW GR.20 Aircrew as required.	The level of detail captured in the existing AMC b and c are tactical in nature and don't give the AM and Key staff the ability to manage the capability from with the ABME or FEG OIP. Future audits under this level of prescriptive language will generate confusion and demand for future regulation updates. Scott		Clarification	Ready for DD	yes	closed	DASA has not incorporated the suggestion. The list is the standard requirement for competency management and covers all staff at an ABMO. The list is aligned with Aircrew.10 and ACD.80

11	ABM.80 GM	SRG	<p>1. Amend: Was: Purpose. (Context) The safe delivery of AMB is supported by knowledge, skills and behaviours benchmarked against contemporary training and learning standards. (Hazard) Undesired ABM knowledge, skills and behaviours can affect safe delivery of ABM. (Defence) The regulation requires the ABMO to establish a Defence ABM qualification and training system to: a, b, c, d</p> <p>Proposed: Purpose. The purpose of this regulation is to assure that personnel employed to understand ABM Operations including engineering and maintenance, are adequately trained and authorised to provide threat particular service.</p> <p>(Context) The safe delivery of AMB is supported by knowledge, skills and behaviours benchmarked against contemporary training and learning standards. (Hazard) Undesired ABM knowledge, skills and behaviours can affect safe management of ABM equipment and execution of ABM operations. (Defence) The regulation requires the ABMO to establish a Defence ABM qualification and training system to manage and assure safe and effective ABMO.</p>	<p>2. Amend GM ABM.80(c). Different competencies will apply to ABMO personnel, depending on what role they fulfil in ensuring the safety of the overall operations. DASA does not prescribe any single competency or framework. The ABMO has the flexibility to document the competencies in approved OIP.</p> <p>GM b reads well and broad enough to capture all the elements of ABM Operations.</p> <p>3. GM ABM.80(d) Regency is very long winded, tactical and operationally focussed. Suggest it could be simplified all the way down to one sentence that says. Regency requirements are required to be managed to support ABM Operations in accordance with approved OIP. Scott</p>		Clarification	Ready for DD	Yes	closed	<p>DASA has partially incorporated the suggestion, as follows:</p> <p>1. change to purpose statement was not incorporated as the provided purpose statement meets the DASR style guide requirements and captures the intent of the suggested change already.</p> <p>2. DASA incorporated the suggestion.</p> <p>3. DASA incorporated the suggestion -- the Recency paragraph was deleted as it is a DASR Glossary term.</p> <p>LSN 149 also refers</p>
12	ABM.30 / .40 / .50 / .60 / .80	SRG	<p>Amend: Provide opportunity to demonstrate AMC through other DASR certifications. The intention of this is to create efficiency and avoid duplication for platforms that are already subject to other DASR oversight in these areas.</p>	<p>Similar to the NPA exception at ABM.70(b), there is direct read across available from organisations compliant with other applicable DASRs. (i.e. 25QN) Douglas</p>		Clarification	Ready for DD	Yes	closed	<p>DASA has not incorporated the suggestion. the AM has the option to propose an alternative means of compliance (ALTMoC).</p>
13	ABM.20	FAA	<p>Addition to ABM.20 – ABM.20 (b) - As an exception from DASR ABM.10(a) and DASR ABM.20(a), a MAO that conducts ABM does not require a separate ABMOC or OpSpec. However, the MAO Operations Specification (OpSpec) and CS must reflect the scope of ABM operations IAW DASR ABM.</p>	<p>The FAA already has regulated processes and training for aircrew conducting ABM activities between aircraft in flight to achieve target investigation and weapon delivery. A MAO already has the certified organisation to manage the scope of ABM for its aircraft and operations. In line with DASR ACD this has been recognised by DASA and the incorporation within the OCS and OpSpec approves the scope of ABM operations conducted airborne by Navy aircrew.</p>		Definition	Ready for DD	Yes	closed	<p>DASA incorporated the suggestion. DASA has updated ABM.20 as follows:</p> <p><i>(b) As an exception from DASR ABM.10(a) and DASR ABM.20(a), a MAO that conducts ABM does not require a separate ABMO or OpSpec. However, the MAO OpSpec and CS must reflect the scope of ABM operations provided IAW DASR ABM.</i></p> <p><i>AMC ABM.20(b) – OpSpec and CS requirements for MAOs conducting ABM (AUS)</i></p> <p><i>a. The MAO's QMS and SMS must incorporate the requirements of DASR ACD.40 and DASR ACD.50.</i></p> <p><i>b. The MAO must comply with DASR ACD.60 and DASR ACD.70.</i></p> <p>LSN 52 also refers</p>
14	MED.05	FAA	<p>Remove ABMO from the MED.05 regulation requiring AvMed training unless conducting duties in the airborne environment.</p>	<p>AvMed training is already required for those Navy, or seconded (RAAF ATC) personnel providing RAN ABM as either aircrew, crew or ATC (under ANSP). The value of AvMed training to ship ASTAC is minimal and disproportional to the impost and safety benefit. Those aspects worthwhile including (fatigue, human factors) are already included within NTS content (to be required under NTS regulation IAW ANP 2023/002) or separately regulated (e.g. AVFM).</p>		Education	Ready for DD	Yes	closed	<p>DASA has not incorporated the suggestion. MED.05 j gives FAA the opportunity to draft the requirements for ASTACs with CO IAM.</p> <p>(j) Aircraft Controllers within an Air Navigation Service Provider (ANSP) or ABMO must meet the AvMED training and Currency requirements defined by CO IAM.</p>
15	Blank due error	DASA							closed	
16	GR.38	AFTG	<p>BP35448689 is a copy of DASR AO.GEN.05 - 27 Jul 23 release that is relevant to DASR ABM, particularly DASR ABM.60.</p>			Clarification	Ready for DD	Yes	closed	<p>DASA incorporated the suggestion. DASA updated GR.38 as follows:</p> <p>GR.38(a)(3) <i>DASR AO.GEN.05 Management of OIP.</i></p>
17	GR.38	AFTG	<p>The Defence AVOIPMAN relates to DASR DASR AO.GEN.05 and is relevant to DASR ABM, particularly DASR ABM.60</p>			Clarification	Ready for DD	Yes	closed	<p>refer LSN16</p> <p>AO GEN.05 under Shift A01 is scheduled to commence no earlier than July 24.</p>

18	GR.38(a)	AFTG	Reword: Defence Air Battle Management services, including equipment, systems and organisations, must be in accordance with:	Is 'and organisations' part of the 'including' statement, vis <i>including equipment, systems and organisations</i> ? The sentence is not correctly structured if that is not the case and the comma before 'and' is incorrect if that is the case. Removing the comma before 'and' and placing it after 'organisations' reads correctly, vis: <i>The provision of Air Battle Management services by Defence, including equipment, systems and organisations, must be in accordance with:</i> <i>However, Defence Air Battle Management services, including equipment, systems and organisations, must be in accordance with:</i> is easier to read.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
19	GR.38(a)(1)	AFTG	Delete ', and'.	Neither punctuation nor conjunctions are used in a list IAW the <i>Australian Government Style Manual</i> (primary) and the <i>Australian Defence Force Writing Manual</i> (secondary) approved sources for conventions of authoring in Defence. The nature of a list is set by the stem sentence. An 'and' list is automatically the basis unless the stem sentence makes it explicitly otherwise. Make the stem sentence read '... organisations, must be in accordance with both:' if DASA needs to make it absolute. Compliance with authoring conventions is prescribed by SEC and CDF, vis http://intranet.defence.gov.au/home/documents/home.htm		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
20	GR.38(a)(2)	AFTG	Replace 'by' with 'in'.	Things are in cross-references not at or by them.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
21	Glossary ABM	AFTG	Change to Source: <i>Australian Defence Glossary</i>	Note that although issued as ADDP 3.3 – <i>Joint Airspace Control</i> , the publication is actually authorised as ADF-I-3 <i>ADF Air Power</i> in the current ADF Doctrine Library vide http://drnet/vcdf/ADF-Doctrine/Pages/ADF-Doctrine-Library.aspx#three_series . Para 2-10 does not exist in ADF-I-3 <i>ADF Air Power</i> (ADDP 3.3). The ADF-I-3 <i>ADF Air Power</i> , Glossary, page 1, definition is: <i>air battle management (ABM)</i> <i>Control of military air operations that may include the control and coordination of defensive counter air, offensive counter air, strategic attack, close air support and other war fighting or supporting air activities.</i> which does not match the NPA definition. The text presented as the definition in the NPA is drawn from ADF-I-3 <i>ADF Air Power</i> (ADDP 3.3) page 2-10 and does not match the ADF-I-3 <i>ADF Air Power</i> (ADDP 3.3) Glossary text. The Glossary, by definition, is the master reference for a definition within a document. However, the NPA definition text matches the text in the <i>Australian Defence Glossary</i> and, presumably therefore, the ADF-I-3 <i>ADF Air Power</i> doctrine Glossary will read the same as the Australian Defence Glossary when the doctrine is updated.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
22	Glosary ABMOps GM ABM.10.a AMC ABM.20(a)b AMC ABM.20(a)d GM ABM.20(a)1.c.iii AMC ABM.30(a)a.v GM ABM.30(a)b ABM.60(a) AMC ABM.60(a)a.i GM ABM.60(a)b ABM.70(a) GM ABM.80(a)a.i	AFTG	Use either: 1. ABM operations 2. ABMOps	ABMOps has been defined: use it or remove it. Operations is a DASPMan defined term, hence a proper noun in DASR.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
23	Glossary ABMOps	AFTG	Reword: Those defined ABM Operations provided to military operations as defined in the Operator Certificate (ABMOC) and the accompanying Operations Specification (OpSpec).	Operations is a DASPMan defined term, hence a proper noun in DASR. The accompanying Operations Specification (OpSpec) goes with the ABMOC to defining the ABMOps provided (moreso in the OpSpec).		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA updated ABMOps Glossary as follows: <i>Those ABM operations provided to military operations as defined in the Operator Certificate and the accompanying Operations Specification.</i>

24	Glossary ABMO	AFTG	The use of 'Civil Aviation Authority (CAA)' should be replaced with 'National Aviation Authority (NAA)'.	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. However, is it really conceivable that an NAA (or CAA) will be certifying an ABMO?		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has removed reference to CAA or NAA. 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.
25	Glossary ABMO	AFTG	Replace 'and/or' with 'or'	Must not use 'and/or' in government documents. See the <i>Australian Government Style Manual</i> https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation-and-capitalisation/forward-slashes .		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, this comment is no longer applicable as the reference to CAA has been removed.
26	Glossary ABMOC	AFTG	Replace: 1. 'DG DASA' with 'DASA' 2. '(ABMOP)' with '(ABMOps)'.	Unless issued personally by DG DASA, any certificate purporting to be an ABMOC would otherwise be invalid if the definition states 'issued by DG DASA'. Further, 'DASA' is understood to be the standardised term that will progressively replace the use of 'the Authority' in the DASPMAN. ABMOps is the defined shortened for of ABM Operations.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
27	ABM.10 (a) GM	AFTG	Reword: (Defence) This regulation requires ABMOs to ensure ABM operations (ABMOps) are conducted as an approved organisation and managed to ensure the safe conduct of ABMOps.	ABMOps has been defined: use it.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
28	ABM.20 (a)	AFTG	Reword: An ABMO must provide a Compliance Statement to DASA to: 1. apply for issue of an ABMOC and attached Operations Specification (OpSpec) 2. apply for reissue of or variation to an ABMOC or attached OpSpec 3. record changes to ABMO Key Staff.	A change of Key Staff (ABM-AM, HTA, etc.) is a reason to issue an updated CS regardless of need for seeking for DASA to issue or update an ABM MAOC or OpSpec.		Clarification	Ready for DD	yes	closed	DASA has not incorporated the suggestion. Names of key staff are not recorded in the CS. NOTE talk to ORA about updating the OCS Template
29	ABM.20 (a) AMC a	AFTG	Delete para title 'ABMO CS.'	The title of the AMC already establishes what the ensuing paragraphs are about.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
30	ABM.20 (a) AMC a	AFTG	Presumably the ABMO CS is different to the Operations Compliance Statement (OCS). Is there an ABMO CS available to review?	Reviewing the draft regulations is less effective without knowledge for what is in the CS.		Clarification	Ready for DD	Yes	closed	There is not a an ABMO CS available for review. DASA will develop the ABMO CS nlt 1 Mar 24.
31	ABM.20 (a) AMC a	AFTG	Fix AMC ABM.20(a).i to iii para alignment.	Formatting		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
32	ABM.20 (a) AMC a.iii	AFTG	Add para title Declaration .	AMC.20(a).iii needs a para title.		Editorial	Ready for DD	Yes	closed	DASA has incorporated the suggestion.
33	ABM.20 (a) AMC b	AFTG	Delete 'for the ABMOC OpSpec'.	A CS does many things and is not solely about the OpSpec.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
34	ABM.20 (a) AMC b	AFTG	Reword: The ABMO CS should include the following information: i. The Accountable Manager (AM) listed by command or management position, eg 'CDR SRG' and name. ii. The Hazard Tracking Authority (HTA) within the ABMO by name. iii. The safety manager within the ABMO (per DASR SMS) by name. iv. The ABM operations (ABMOps) provided.	The ABMO CS is required to name the ABMO Key Staff. The OpSpec identifies Key Staff by position (e.g. 'CDR SRG', 'HTA', 'Safety Manager') but the CS needs the personnel filling the Key Staff appointments to be named. Incorporates editorial corrections: * Reformat the list in to complete sentences. * Incorrect use of a comma. A comma goes after parenthesis only if the comma would be used without parenthesis. * ABMOps has been defined: use it. Education only. As stated in prior feedbacks, the <i>Australian Government Style Manual</i> is the primary spelling reference and (although I do not agree with it) prescribes all <i>Latin</i> abbreviations are to use full-stops, e.g., i.e., etc. However, the <i>Australian Defence Force Writing Manual</i> prescribes the exact opposite, ie, eg, etc. (Note the full-stop after 'etc' is only owing to it being the end of the sentence.) However, whichever of the two, with full-stops or without full-stops, the convention applied must be consistent within the manual and may be only one (eg) or the other (e.g.) and not in-between (eg., e.g.).		Editorial	Ready for DD	Yes	closed	DASA has partially incorporated the suggestion. DASA has incorporated editorial corrections but has not incorporated the requirement to name the person filling the position in order to retain alignment with AMC ARO.100.C.2, AMC1 ACD.20(a).b, AMC ANSP.20.A.1.d.
35	ABM.20 (a) AMC c	AFTG	Delete 'upon DASA review'.	While updating the OpSpec to close a limitation will require DASA action to update the OpSpec, removing a limitation does not necessarily require DASA review.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
36	ABM.20 (a) AMC c	AFTG	Change 'remove or impose' to 'close or add'.	It is the applicant who is imposing the limitation and DASA is adding it to the OpSpec in this context.		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA uses 'Remove' and 'impose' as standardised words.

37	ABM.20 (a) AMC d	AFTG	Move AMC ABM.20(a)d to para c and reword: c. The CS should demonstrate how the ABMO will meet DASR ABM and safely conduct ABMOps.	AMC ABM.20(a)d belongs before AMC ABM.20(a)c. Paras a and b describe content in the ABMO CS. Para c is about CS Limitations and para e prescribes requirements for the CS attestation. Current para d is about ABMO CS content 'The CS should demonstrate how the ABMO will meet DASR ABM and safely conduct ABM operations.' and is thereby out-of-place between paras c and e. ABMOps has been defined: use it.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
38	ABM.20 (a)	AFTG	Add para g. g. Key Staff and DASR compliance updates. The ABMO should update the CS for change of Key Staff and for changes to DASR compliance evidence and send the updated CS to DASA even though this does not require updating the ABMOC or the attached Op Spec.	New para required.		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has not added the requirement to name the person filling the position in order to retain alignment with AMC ARO.100.C.2, AMC1 ACD.20(a).b, AMC ANSP.20.A.1.d.
39	ABM.20 (a) GM a	AFTG	Unbold 'Refer GM ABM.10 – ABM organisational approval (AUS).'	The sentence 'Refer GM ABM.10 – ABM organisational approval (AUS).' is paragraph text not para title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
40	ABM.20 (a) GM b	AFTG	Bold 'Provision of evidence.'	The phrase 'Provision of evidence.' is a paragraph title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
41	ABM.20 (a) 1	AFTG	Reword IAW comment to ABM.20(a)			Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has not added the requirement to name the person filling the position in order to retain alignment with AMC ARO.100.C.2, AMC1 ACD.20(a).b, AMC ANSP.20.A.1.d.
42	ABM.20 (a) 1.a	AFTG	Replace 'ABM operation' with ABM Operator' (or 'ABMO').	ABMOC goes to the suitability of an ABM Operator not the ABM operations conducted by an ABM Operator.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
43	ABM.20 (a) GM 1.b.ii	AFTG	Lowercase location.	Unless it is a proper noun, the first word of a sentence is lowercase in a list of incomplete sentences.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
44	ABM.20 (a) GM 1.b.iii	AFTG	Replace double closing parenthesis with single.	Currently written 'Operations Specification (OpSpec)'. Removes unpaired closing parenthesis.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
45	ABM.20 (a)GM 1.c	AFTG	Bold 'ABMOC OpSpec.'	The phrase 'ABMOC OpSpec.' is a paragraph title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
46	ABM.20 (a) GM 1.c.iii	AFTG	Reword: ABMOps provided	ABMOps has been defined: use it.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
47	ABM.20 (a) GM 1.c.v	AFTG	Delete 'upon DASA review'.	As for AMC ABM.20(a)c, while updating the OpSpec to close a limitation will require DASA action to update the OpSpec, removing a limitation does not necessarily require DASA review. Limitations can be removed by other authorities, e.g. the ABMO-AM, Environment Commander.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
48	ABM.20 (a) 2	AFTG	Reword IAW comment to ABM.20(a)			Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. LSN 28 response refers
49	ABM.20 (a) GM 2.a	AFTG	Bold 'Application for reissue or variation to an ABMOC or OpSpec.'	The phrase 'Application for reissue or variation to an ABMOC or OpSpec.' is a paragraph title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
50	ABM.20 (a) GM 2.a	AFTG	Delete 'as required'.	Unneeded.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
51	ABM.20 (a)	AFTG	Add ABM.20(a)3 IAW comment to ABM.20(a): 3. <i>record changes to ABMO Key Staff.</i>	A change of Key Staff (ABM-AM, HTA, etc.) is a reason to issue an updated CS regardless of need for seeking for DASA to issue or update an ABM MAOC or OpSpec.		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. LSN 28 response refers
52	ABM.20	AFTG	Add para (b) [ABM.20(b)]: (b) As an exception from DASR ABM.10(a) and DASR ABM.20(a), a MAO that conducts ABMOps does not require a separate ABMOC and OpSpec. However, the MAO Operations Specification (OpSpec) and CS must reflect the scope of ABM services provided IAW DASR ABM.	As with DASR ACD, where an MAO that provides ACD does not need a separate ACD approval, an ABMO that is already a MAO should not need to manage a separate ABMO approval.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated ABM.20 as follows: (b) <i>As an exception from DASR ABM.10(a) and DASR ABM.20(a), a MAO that conducts ABM does not require a separate ABMO or OpSpec. However, the MAO OpSpec and CS must reflect the scope of ABM operations provided IAW DASR ABM.</i> <i>AMC ABM.20(b) – OpSpec and CS requirements for MAOs conducting ABM (AUS)</i> <i>a. The MAO's QMS and SMS must incorporate the requirements of DASR ACD.40 and DASR ACD.50.</i> <i>b. The MAO must comply with DASR ACD.60 and DASR ACD.70.</i> LSN 13 also refers

53	ABM.30 (a) AMC a	AFTG	Reword: <i>An ABMO organisational structure should include:</i>	<p>Simpler. As per DASPMAN Vol 2, (Introduction page) para 3:</p> <p>3. <i>DASR clauses and sub-clauses may have associated supporting information in the form of:</i></p> <p><i>a. Acceptable Means of Compliance (AMC). AMC is information published by DASA to identify a means of meeting one or more requirements of the DASR. Regulated entities are not required to comply with AMC and may instead propose an Alternative Means of Compliance to DASA. Any such proposal will be subject to separate assessment by DASA to determine whether the approach is compliant with the DASR.</i></p> <p><i>b. Guidance Material (GM). GM provides additional explanation to assist the application of the requirement and/or explain the AMC.</i></p> <p>Note though the not permitted use of 'and/or' in DASPMAN Vol 2, para 3b. Stating '... and may also be used to explain the AMC.' would negate the temptation to use and/or.</p> <p>Consequently, stating <i>ABMOs should ensure their organisational structure includes:</i> is unnecessarily complex.</p>		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
54	ABM.30 (a) AMC a.i	AFTG	Replace 'EGCDR' with 'EG CDR'	Always has been two words.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
55	ABM.30 (a) GM a	AFTG	Unbold 'Refer GM ABM.10 – ABM organisational approval (AUS).'	The sentence 'Refer GM ABM.10 – ABM organisational approval (AUS):' is paragraph text not para title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
56	ABM.30 (a) GM c	AFTG	Capitalise Aviation System	DASPMAN defined term, hence a proper noun in DASR.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
57	ABM.30 (a) GM c	AFTG	<p>Replace 'Where those Key Staff are employed in organisations external to the military unit, or contractor/tasked organisation, which form the core of the ABMO, ...' with</p> <p><i>Where those Key Staff that form the core of the ABMO are employed in organisations external to the military unit or the contractor or tasked organisation, ...</i></p>	<p>Must not use a forward slash in place of a conjunction in government documents. See the Australian Government Style Manual https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation-and-capitalisation/forward-slashes.</p> <p>Editorial corrections for:</p> <ul style="list-style-type: none"> * correct attribution (It is the Key Staff that form the core of the ABMO and the remainder of the sentence is about what to do if those personnel are external to the ABMO) * incorrect use of commas * that is definitive, which is descriptive. 		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
58	ABM.30 (a) GM c	AFTG	Replace 'ACD services' with 'ABMOps' (or 'ABM Operations', according to the determination from the comment to NPA Section 1, Air Battle Management Operations (ABMOps); GM ABM.10.a; AMC ABM.20(a)b; etc.).	Missed editing from adapting DASR ACD used as a template for the DASR ABM NPA.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
59	ABM.30 (a)2	AFTG	Reword: 'the relationship and reporting lines between the personnel performing ABMO functions and other parts of the organisation'	The phrase 'these personnel' is ambiguous.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
60	ABM.30 (a)3	AFTG	<p>Reword: 'formal relationships with all other contributors to the ABMO service provision that may directly influence the safety of ABMOps'</p> <p>(or 'ABM Operations', according to the determination from the comment to NPA Section 1, Air Battle Management Operations (ABMOps); GM ABM.10.a; AMC ABM.20(a)b; etc.).</p>	<p>ABMO added for precision because the concern to the ABMO-AM is the ABMO services.</p> <p>Use of 'their' in '... influence the safety of their services' is ambiguous: is it the ABMO or the other contributors? Furthermore, it all comes down the safety of the ABM operations, which includes the services, not just the services alone.</p>		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

61	ABM.30 (a) GM 3.a	AFTG	Reword: 'ABM.30(a)3 requires the ABMO to define all formal relationships with all contributors to the ABMOs. This is to define the external inputs to the ABMO that can influence the safety of AMBOPs. The ABMO CS should refer to MOUs or other formal agreements in place.	The requirement is on the ABMO, which is an 'organisation'. Hence stating ...' requires the ABM Organisation organisations ...' doesn't make sense. External inputs are to the ABMO and it all comes down the safety of the ABM operations, of which quality of the services is an element but not the determinant, nor just the services alone, required of the DASR outcome.		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated GM ABM.30(a)3 as follows: <i>a. The ABMO should define all formal relationships with all contributors to ABMOs. This is to define the external inputs to the ABMO that can influence the safety of ABMOs. The ABMO CS should refer to MOUs or other formal agreements in place.</i>
62	ABM.50 (a)	AFTG	Reword: An ABMO must detail a Quality Management System (QMS) to achieve regulatory compliance, conformance, and consistency and continuity of safe operations, through quality planning, quality assurance, quality control, and quality improvement.	Incorrect use of semicolons and a spaced em dash.		Editorial	Ready for DD	Yes	closed	DASA has incorporated the suggestion. DASA updated ABM.50(a) and aligned the wording to the equivalent section in the draft DASR ARO.100 as follows: <i>An ABMO must utilise a QMS to achieve regulatory compliance and conformance, and consistency and continuity of safe operations—through quality planning, quality assurance, quality control and quality improvement.</i>
63	ABM.50 (a) GM a	AFTG	Replace 'their' with 'the'.	Using 'their' is not needed for correct grammar even in the modern non-gender, non-binary pronoun context. Otherwise, replace 'the ABMO-AM' with 'ABMO-AMs' earlier in the sentence.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
64	ABM.50(a) GM aa	AFTG	Replace 'they are' with 'the AM is'.	As for 'their' more precise words removes the unnecessary use of 'they'. Otherwise, replace 'the ABMO-AM' with 'ABMO-AMs' earlier in the sentence.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
65	ABM.50 (a) GM b	AFTG	Unbold 'ABMOs', replace 'DASRs' with 'DASR', and insert a full stop to end the para.	Incorrect bolding; DASR is already plural; correct punctuation.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
66	ABM.60	AFTG	ABM.60 needs to refer the DASR AO.GEN and AO.GEN.05 in particular, and also to be reviewed whether there is need to link to the <i>Defence Aviation Orders, Instructions and Publications Manual (AVOIPMAN)</i> .	AO.GEN.05 - MANAGEMENT OF OIP is applicable to an ABMO. A range of requirements prescribed in ABM.60 are already covered in DASR AO.GEN.05.		Definition	Ready for DD	Yes	closed	DASA incorporated the intent of the suggestion. DASA has updated the proposed GR.38 to include DASR AO.GEN.
67	ABM.60 (a) AMC a.v	AFTG	Recast as new para AMC ABM.60(a)b and adjust sub-para designations accordingly.	AMC ABM.60(a)a.v: <i>ABM OIP should detail as a minimum does not flow from the stem sentence in ABM.60(a)a: ABMOs should maintain ABM OIP: (i.e. 'ABMOs should maintain ABM OIP ... ABM OIP should detail as a minimum' doesn't make sense)</i>		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated the stem sentences of AMC ABM.60(a).a.v as follows <i>a. ABMOs should maintain ABM authorised OIP that: v. should detail as a minimum:</i>
68	ABM.60 (a) AMC a.v.g.4	AFTG	Reword: for the introduction of new equipment, processes for managing the risk of interference or ineffective interoperability with:	Incorrect use of commas.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
69	ABM.60 (a) AMC a.v.g.4.a and b	AFTG	Correct para formatting.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
70	ABM.60 (a) AMC a.v.g.4.b	AFTG	Define TACPs and IAMD.	TACPs and IAMD are undefined terms		Definition	Ready for DD	Yes	closed	DASA incorporated the suggestion.
71	ABM.60 (a) AMC a.v.g.5	AFTG	Delete the full stop ending the sentence	Full stop only at the end of the last sentence in a list of incomplete sentences.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

72	ABM.60(a) GM a	AFTG	Unbold 'Refer GM ABM.10 – ABM organisational approval (AUS).' and delete the second full stop.	The sentence 'Refer GM ABM.10 – ABM organisational approval (AUS).' is paragraph text not para title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
73	ABM.70	AFTG	ABM.70 needs to refer to the <i>Defence Aviation Safety Design Requirements Manual</i> (DASDRM).			Clarification	Ready for DD	yes	closed	DASA has not incorporated the suggestion. DASDRM does not contain content relevant to ABM systems. DASA does not intend to add any certification requirements for ABM into the ADRM.
74	ABM.70 (a) & AMC ABM.70 (a) a	AFTG	Lowercase equipment.	Equipment is neither a DASPMAN defined term nor a proper noun.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
75	ABM.70 (a) AMC b	AFTG	Reword: 'ABMOs should manage ABM Equipment, systems and installations in compliance with appropriately authorised.'	Specifications, operating and installation instructions, and ongoing maintenance requirements and instructions must be authorised for use (see DASR AO.GEN.05).		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA updated AMC ABM.70(a)b as follows: <i>b. The ABMO should manage ABM equipment, systems and installations in compliance with appropriately authorised:</i>
76	ABM.70 (a) AMC a.i	AFTG	Reword: 'OEM design specifications'	Simpler.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has retained the original wording to maintain consistency with other DASR
77	ABM.70 (a) AMC b	AFTG	Reword: 'For the introduction of new equipment, ABMOs should utilise processes for managing the risk of interference or ineffective interoperability with:.'	Incorrect use of commas.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
78	ABM.70 (a) AMC b.ii	AFTG	Define TACPs and IAMD.	TACPs and IAMD are undefined terms		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
79	ABM.70 (a) AMC c	AFTG	Bold 'Software.'	Para title		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
80	ABM.70 (a) GM a	AFTG	Unbold 'Refer GM ABM.10 – ABM organisational approval (AUS).' and delete the second full stop.	The sentence 'Refer GM ABM.10 – ABM organisational approval (AUS).' is paragraph text not para title.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
81	ABM.70 (a) GM b	AFTG	Reword: ' Applicability . This regulation applies to ABM equipment and systems not permanently fitted to an Aircraft.'	This is a non-specific aircraft, hence use of 'an' rather than 'the'. Otherwise, which aircraft is <i>the aircraft</i> ? Stating 'DASR 21 requirements apply to any equipment or system permanently fitted to an Aircraft' is redundant: these very words are needed in ABM.70(b).		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has removed the Applicability paragraph as it is no longer required with the creation of the exception clause. LSN 144 also refers
82	ABM.70 (b)	AFTG	Reword: 'As an exception, DASR ABM.70(a) does not apply to equipment and systems permanently fitted to an Aircraft (DASR 21 requirements apply to any equipment or system permanently fitted to an Aircraft).'	Equipment permanently fitted to the aircraft is managed under DASR 21. ABM.70(b) as written: 'As an exception, DASR ABM.70(a) does not apply to equipment and systems permanently fitted to an Aircraft and managed under DASR 21 requirements.' implies that the ABMO could choose to use ABM.70(a) and forego compliance with DASR 21, which is not the intent or requirement. The rewriting ABM.70(b) placing the text 'DASR 21 requirements apply to any equipment or system permanently fitted to an Aircraft' provides further information that removes the ambiguity and firmly directs the ABMO to DASR 21.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA has already changed the wording as follows: (b) As an exception, DASR ABM.70 (a) does not apply to equipment and systems managed under DASR 21 requirements.
83	ABM.80 (a)	AFTG	Replace 'their' with 'the assigned'.	Their is ambiguous. Using 'the assigned'.		Editorial	Ready for DD	Yes	closed	DASA has partially incorporated the suggestion. DASA updated DASR ABM.80(a) as follows: <i>... their assigned ABM duties</i>
84	ABM.80 (a) AMC b	AFTG	Delete the comma following defined	incorrect use of a comma.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
85	ABM.80(a) AMC b.i.c	AFTG	Delete the full stop ending the sentence	Full stop only at the end of the last sentence in a list of incomplete sentences.		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, (c) is the last sentence in list i.
86	ABM.80 (a) GM a.ii	AFTG	Reword: 'actively monitor and correct knowledge, skills and behaviours, to ensure that the required standards are maintained.'	Editorial to: * remove incorrect use of a comma * correct the context: all of knowledge, skills and behaviours need to be monitored and corrected.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

87	ABM.80 (a) GM c	AFTG	No need for a separate paragraph. Merge in to the preceding Competency para.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
88	ABM.80 (a) GM d	AFTG	Replace 'ie' with 'eg'.	The example is an example (eg) not the exemplar (ie).	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
89	ABM.80 (a) d	AFTG	Reword: '... to eliminate and otherwise minimise risk SFARP.'	The WHS Act s.17 requirement is to eliminate risk SFARP and, if eliminate is not reasonably practicable, to minimise risk SFARP. A comma is needed to link SFARP to the entire sentence not just to minimise risk.	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
90	ABM.80 (a) GM d	AFTG	Replace 'air load' with 'ABM'.	Missed editing from adapting DASR ACD used as a template for the DASR ABM NPA.	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
91	AVFM.10 (a)	AFTG	Reword: DASR ARO.100, DASR ANSP or DASR ABM	Full-stops should not used between DASR and the regulation part unless always used between DASR and the regulation part throughout DASR. This is not how the DASR parts are identified in the headings vis https://dasa.defence.gov.au/sites/default/files/minisite/static/c22cde15-a3fc-4ae5-b49c-9f8cb6c0b53d/pgp/index.htm?#t=dasr.htm . Full stops are used between the part and the regulation number but not between 'DASR' and the part. Incorrect use of a comma before a conjunction.	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA will create a DCP to update AVFM to the new style guide.
92	AVFM.10 (b)	AFTG	Replace 'AVFM.10.A' with 'AVFM.10(a)'	Correct DASR format.	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA will make an editorial change to DASR AVFM
93	AVFM.10 (b) 4	AFTG	Replace: 1. 'DASR.UAS.20.A' with 'DASR UAS.20(a)' 2. 'DASR.UAS.30.A(1)' with 'DASR UAS.30(a)1' 3. 'DASR.AVFM' with 'DASR AVFM'.	Correct DASR format.	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA will make an editorial change to DASR AVFM
94	AVFM.10 (b) 4	AFTG	Insert a comma after '... Type A Category UAS' to link '... where the Authority has identified a need to comply with DASR.AVFM.'		Clarification	Ready for DD	yes	closed	DASA incorporated the suggestion. DASA will make an editorial change to DASR AVFM
95	AVFM.10 (b) 4	AFTG	personnel who meet the definition of DASR Glossary – Crew and operate UAS IAW DASR UAS.20 – Certified Category UAS or DASR UAS.30(b) [Specific Type A], where DASA has identified a need to comply with DASR AVFM.	Full-stops should not used between DASR and the regulation part unless always used between DASR and the regulation part throughout DASR. This is not how the DASR parts are identified in the headings vis https://dasa.defence.gov.au/sites/default/files/minisite/static/c22cde15-a3fc-4ae5-b49c-9f8cb6c0b53d/pgp/index.htm?#t=dasr.htm . Full stops are used between the part and the regulation number but not between 'DASR' and the part. DASA is understood to be the standard term to replace	Clarification	Ready for DD	yes	closed	DASA incorporated the suggestion. DASA will make an editorial change to DASR AVFM
96	Multiple	HQAC	Recommend the use of 'An ABMO must' and 'The ABMO must' rather than 'ABMOs must'.	The regulation is applied to each ABMO as an individual entity, rather than to a collective of ABMOs.	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated ABM.60 and .70 as follows '(a) An ABMO must'
97	Multiple	HQAC	Standardise the use throughout of ABM operation, ABM operations, or ABMOps. Delete ABMOps from the Glossary if it is not going to be appropriately used.	There are multiple uses: 13 ABM operations, 6 ABM operation, 5 ABMOps (3 of them in one GM).	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASR ABM has been updated to use ABMOps.
98	Multiple	HQAC	Paragraph formatting, especially in GM - does a single paragraph have an 'a.' prefix? i.e. GM ABM.10, GM ABM.30(a)3, GM ABM40(a).	Looking for consistency with other stand-alone purpose statements throughout DASR e.g. GM MED.05	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion.

99	Multiple GM	HQAC	Do not keep repeating GM ABM.10. Contextualise the GM as appropriate to the section.			Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. All regulations require a purpose statement in the DSR Style guide. Several of the regulations have the same purpose statement, there is a different purpose statement where relevant.
100	Multiple GM	HQAC	If GM ABM.10 is to be regurgitated, repeat it in full rather than a signpost to the original entry.	Should not have to go backwards and forwards when reading the Part.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. It has not been repeated in full IAW DASA Style guide and brevity goal.
101	Glossary ABMOps	HQAC	Air Battle Management Operations (ABMOps) Those defined An ABM operations provided to military operations as defined in the Operator Certificate.	Suggest this definition be revised as a singular operation, considering the phrase 'ABM operation' is used throughout DASR ABM (e.g. GM.20(a)1). Does not preclude the use of the plural. Should 'ABM' be introduced? Is 'military operations' relevant to the glossary definition? Also update the Acronyms list if suggestion accepted.		Clarification	Ready for DD	Yes	closed	DASA has partially incorporated the suggestion. DASA has updated the Glossary entry as follows: <i>'Those ABM operations provided to military operations as defined in the Operator Certificate and the accompanying Operations Specification.'</i>
102	Glossary ABMO	HQAC	CAA vs NAA?			Education	Ready for DD	Yes	closed	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. NAA will be the new terminology and published in the Feb 24 DASR release
103	Glossary ABMO	HQAC to provide an Air Battle Management operation (ABMO) Service.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
104	Glossary ABMOC	HQAC provide Air Battle Management Operations (ABMOP-ABMOps) as defined			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
105	ABM.10 GM	HQAC	(Defence) This regulation requires an ABM Operator (ABMO) ABMOs to ensure ABM operations are conducted as an approved organisation and managed to ensure the safe conduct of ABM operations.	First instance of ABMO so should be introduced. Consistency between the singular and plural use of ABMO.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
106	ABM.10	HQAC	There needs to be a Scope as to who specifically the regulation applies to, and maybe who it doesn't.	The ABM definition is broad. 4SQN JTACs control Close Air Support, but advice from DASA FLTOPS is that they are not included. There should be definitive information in the Part.		Definition	Ready for DD	Yes	closed	DASA incorporated the intent of the suggestion. DASA has added an applicability clause to GM ABM.10.b as follows: <i>b. Applicability. This regulation does not apply to Joint Terminal Attack Controllers (JTACs).</i>
107	ABM.20(a) AMC a	HQAC	The ABMO CS should include the following information for the ABMO certificate (ABMOC):			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
108	ABM.20(a) AMC a.iii	HQAC	Paragraph formatting			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
109	ABM.20 (a) AMC b.i	HQAC	e.g. eg	Defence writing		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. ADF Writing manual 3.104 In Defence writing, unlike the Style Manual and the Macquarie, full stops are not used between the letters or at the end of these shortened forms.
110	ABM.20 (a) GM a	HQAC	Paragraph formatting	The sentence should not be bold font.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
111	ABM.20 (a) GM b	HQAC	Paragraph formatting	Paragraph heading should be bold i.e. 'Provision of evidence.'		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
112	ABM.20 (a) GM b	HQACcreating unique documents with no enduring value once the ABMOC certificate is issued.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
113	ABM.20 (a) GM 2.a	HQAC	Paragraph formatting	All of the paragraph heading should be bold i.e. 'Application for reissue or variation to an ABMOC or OpSpec.'		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
114	ABM.20 (a) GM 2.b	HQAC	Addition of a service an operation to ABMOC OpSpec.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

115	ABM.20 (a) GM 2.b	HQAC	The statement does not need to address	Suggest this is more understandable. (the existing words are from the GM ACD.20(a)2b that could also be improved.)		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
116	ABM.20 (a) GM 2.b	HQAC	Include as last sentence of para: Refer to the Defence Aviation Safety Program Manual Volume 3 for further guidance.	This is included in the corresponding GM for ACD (GM ACD.20(a)2b).		Education	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. There is no content in the draft DASPMan Vol 3 referring to variation of an Operating Certificate or OpSpec.
117	ABM.30 (a) AMC a	HQAC	The ABMO ABMOs should ensure their organisational			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
118	ABM.30 (a) GM a	HQAC	Paragraph formatting	123		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
119	ABM.30 (a) GM b	HQAC	Force Element Group (FEG)	Consistency. FEG was used in AMC ABM.20(a).a.i without the acronym being expanded.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated AMC ABM.20(a).a.i by expanding 'Force Element Group (FEG)' and this reference has been changed to FEG.
120	ABM.30 (a) GM c	HQAC (other contributors to the safety of ABM operations ACB-services).	QA of cut and paste of DASR ACD.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
121	ABM.30 (a) GM 3	HQAC	ABM.30(a)3-requires-ABMO organisations should to- define all formal relationships with all contributors to the ABMOs. This is to define the external inputs to their ABMOs that can influence the quality of the services provided. The ABMO CS should refer to MOUs or other formal agreements in place.	An ABMO is an organisation. Note that this GM is a copy from DASR ACD (GM2 ACD.30(a)b), but it isn't a great GM to explain why the relationships should be defined. (the corresponding words in GM2 ACD.30(a)b could also be improved.) Does the MOU acronym need to be expanded or defined?		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated GM ABM.30(a).3 as follows: <i>'The ABMO CS should refer to any formal agreements in place.'</i>
122	ABM.40(a)	HQAC	Is an SMS to be utilised because of DASR SMS, or is DASR SMS to be utilised for an SMS?	This is from DASR ACD, but the DASR ANSP has clearer language to 'establish and maintain an SMS IAW DASR SMS. (and no GM)		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASR ANSP is undergoing amendment to update it to the same DASR ACD contextualised language. Utilise is now the standardised term for 'establish, maintaining and using'
123	ABM.40 (a) GM	HQAC	Paragraph formatting	The sentence should not be bold font.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
124	ABM.40 (a) GM	HQAC	Is there any value to this GM? Suggest delete.			Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. All regulations require a purpose statement iaw the DASR Style guide. DASR ANSP will be updated to add a purpose statement.
125	ABM.50	HQAC	An ABMO must detail have a Quality Management System	Shouldn't be enough just to detail it, it should be working.		Editorial	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA updated ABM.50(a) and aligned the wording to the equivalent section in the draft DASR ARO.100 as follows: <i>An ABMO must utilise a QMS to achieve regulatory compliance and conformance, and consistency and continuity of safe operations—through quality planning, quality assurance, quality control and quality improvement.</i>
126	AMC ABM.50 (a) AMC	HQAC	Is this AMC, or GM?	It is GM in DASR ANSP and AMC in DASR ACD; which is correct?		Clarification	Ready for DD	Yes	closed	It is AMC. DASR ACD is the updated wording from the DASR ANSP structure. ANSP is currently being updated
127	ABM.50 (a) AMC a	HQAC	An ABMO ABMOs should have a QMS that achieves the following purposes:			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
128	ABM.50 (a) GM a	HQAC	Purpose. (Context) An ABMO-AM has regulatory requirements to ensure compliance and conformance.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
129	ABM.50 (a) GM b	HQAC	An ABMO ABMOs may integrate their QMS with their other management systems (e.g. eg SMS) into a single management system, commensurate with the size and scope of the organisation. However, integrated systems must remain compliant with all relevant DASRs	In addition, remove bold font from first word 'ABMOs'.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

130	ABM.60 (a)	HQAC	Delete the repetition of OIP.	'OIP must contain OIP' makes no sense. Suggest OIP be replaced by operating manuals per the corresponding use in ACD.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated ABM.60 as follows: <i>a. ABMOs should maintain ABM authorised OIP that: i. contains the information required by personnel to perform their ABMOps duties</i>
131	ABM.60 (a) AMC a	HQAC	The ABMO ABMOs should maintain ABM OIP:	Suggest OIP be replaced by operating manuals per the corresponding use in ACD.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. ABM organisations use more than just the operating manual including a significant amount of OIP. The ACD organisations incorporate everything into the ACD operating manual.
132	ABM.60 (a) AMC a.i	HQAC	containing the orders, instructions, procedures and information required by personnel to perform their ABM operations duties	If don't adopt suggestion above for replacing OIP in the stem.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
133	ABM.60 (a) AMC a.iii	HQAC	ensuring personnel can perform their duties in accordance with authorised these OIP	How can the OIP ensure the personnel do their duties? Is the emphasis on what the OIP does, or what the personnel do?		Editorial	Ready for DD	Yes	closed	DASA incorporated the the suggestion. DASA has updated AMC ABM.60(a).iii as follows: <i>ii. ensures personnel perform their duties in accordance with authorised OIP</i>
134	ABM.60 (a) AMC a.v	HQAC	a. ABMOs should maintain ABM OIP: v. ABM OIP should detail as a minimum	Rephrase so that it flows on from the stem at para a, or start afresh as a para b.		Editorial	Ready for DD	Yes	closed	DASA incorporated the intent of the suggestion. DASA has updated AMC ABM.60(a).v as follows: <i>a. ABMOs should maintain ABM OIP: v. that should detail as a minimum</i>
135	ABM.60 (a) AMC a.v.(g).2	HQAC	operations Operations	Lowercase		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
136	ABM.60 (a) GM a	HQAC	Paragraph formatting	The sentence should not be bold font.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
137	ABM.60 (a) GM b	HQAC	Delete paragraph entirely. OIP is defined within the Glossary	Orders, Instructions And Publications (OIP) * A suite of advisory, informative, procedural, directing and mandating documents that support the operations of an aviation system. OIP may include: aircrew manuals specific to type; general aircrew publications; Defence Instructions; Standing Instructions; command and unit issued Flying Orders, Special Flying Instructions and standard operating procedures.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
138	ABM.70 (a)	HQAC	ABMOs -An ABMO must ensure...	Consistency with other ABM IR.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
139	ABM.70 (a) AMC a	HQAC	The ABMO ABMOs should manage ABM Equipment, systems and installations in compliance with:			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
140	ABM.70 (a) AMC b	HQAC	For the introduction of new equipment, the ABMO ABMOs should utilise processes for managing the risk of interference with, or ineffective interoperability, with:			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
141	ABM.70 (a) AMC c	HQAC	Software . The ABMO ABMOs should implement software safety assurance in accordance with applicable industry standards.	Paragraph heading should be bold i.e. ' Software .'		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
142	ABM.70 (a) AMC d	HQAC	Reporting . The ABMO ABMOs should perform defect and unserviceability reporting of equipment, systems and installations.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

143	ABM.70 (a) GM a	HQAC	Paragraph formatting	The sentence should not be bold font.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
144	ABM.70 (a) GM b	HQAC	Is this applicability paragraph necessary given that there is an exception clause in the Part?			Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated GM ABM.70(a)b to remove the applicability paragraph.
145	ABM.80	HQAC	Delete Categorisation from title and AMC. Apart from ABM as mission crew, is there any need for other members of the ABM community to have a categorisation system?	Mission Crew are already catered for in Aircrew.10; why is that not signposted?		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated ABM.80 as follows: - the word Categorisation has been removed. - DASA has created a new GM to signpost to Aircrew.10. c. Aircrew. <i>Aircrew are subject to DASR Aircrew.10. For a MAO conducting ABM, compliance with DASR Aircrew.10 regarding Aircrew achieves the effect of a competency management system.</i> Reworded in consultation with SQNLDR Rowe 17 Oct 23 (Rationale: 'Aircrew' more precisely describes 2SQN ABM than 'Mission Crew'). LSN 9 also refers
146	ABM.80 (a)	HQAC	The An ABMO must ensure...	Consistency with other ABM IR.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
147	ABM.80 (a) AMC c	HQAC	The ABMO ABMOs should ensure a method of recording Categorisation, Competency and Currency. The recording system should include:			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
148	ABM.80 (a) GM b	HQAC	Competency. The ABMO ABMOs are responsible for ensuring personnel hold appropriate Competencies for the different types of ABM roles and functions, and for assessing Competencies of personnel involved in the provision of ABM.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
149	ABM.80 (a) GM d	HQAC	Delete whole para; Recency is defined within the Glossary.	Recency * A prescribed period of on-going practical application of a function, set within a prescribed currency period that ensures a qualification or skill remains proficient throughout the currency period.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. LSN 11 also refers

150	ABM.80 (a) GM d	HQAC	If this GM is to be kept - last sentence, delete reference to 'air load team' and replace with a term relevant to DASR ABM rather than DASR ACD.	QA of cut and paste of DASR ACD.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
151	Glossary ABMO	AIR6500	Use of the word 'Operator' in this term could cause confusion between an individual Operator and an organization. Consider reverting to term used in initial draft: 'Service Provider' or to just 'Provider'.			Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. SRG requested the change from Service Provider to Operator and language has been aligned with the MAO.
152	Glossary ABMO	AIR6500	The definition of ABMO here appears to make the responsible organization at the Wing (ie 41WG) or lower operating unit level. Please clarify the intended level of organisation expected to hold an ABMOC.	Given the responsibilities of the ABMO it will be necessary for CASG to establish a close relationship when delivering and sustaining equipment and systems. Understanding the organisational level will enable CASG to plan effective support for ABMO certification.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. It is clarified in GM ABM.30(a),b
153	Glossary ABMOC	AIR6500	Same concern as LSN 151			Education	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. It is clarified in GM ABM.30(a),b
154	Glossary ABMOC	AIR6500	Acronym ABMOP in second line seems to be incorrect. Suggest correction from 'ABMOP' to 'ABMOPs' as used in the earlier definition above this and in the Acronyms List below it.			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
155	ABM.20 (a) 1	AIR6500	Initial draft included a 'Service Provision Conditions (SPC)' which appeared to be a limitations type of document (eg allowed to do everything in scope statement except what's in the SPC) that would be imposed by DASA whereas the Operations Specification appears to be the scope statement prepared by the ABMO. If this is correct, please clarify how conditions/limitations will now be documented.	A possible approach to this may be for the ABMO to draft an aspirational OpSpec as the basis for their Compliance Statement, then for DASA to issue an approved OpSpec revised to reflect the actual certified operations scope. Alternative may be a limitations annex to the OpSpec.		Education	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, conditions and limitations are a section in the OpSpec.
156	ABM.70 (a)	AIR6500	Previous draft wording on use of 'authorised industry standards' implied an authorization process that may or may not have involved DASA whereas new wording seems to leave the decision as to what is an applicable standard to the ABMO. Clarification of intent as to who makes that applicability decision is required.	Clarification is needed to enable CASG to negotiate for use of standards that will be followed in system development and delivery to the ABMO.		Clarification	Ready for DD	Yes	Closed	DASA has not incorporated the suggestion. DASA has removed the content of ABM.70 and replaced it with 'RESERVED'. LSN 178 refers
157	ABM.20 (a) AMC	AIR6500	The Compliance Statement content called out in this AMC does not address all of the requirements in the ABMs. For example, there is no requirement for the CS to include any information on the existence or status of the QMS required by ABM.50 or on OIP as required by ABM.60. How is compliance with these to be assessed and documented?	Omission of guidance on method of compliance for significant elements of the framework creates uncertainty on how the assessment process will work.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, the CS shows how they meet all of the applicable DASR listed in the proposed GR.37.
158	ABM.20 (a) AMC a.i	AIR6500	Noting the earlier comment about ABMO organisation level at Section 1 ABMO Definition, need to check if intent is for the FEG to be the Operator or the Wing (or lower). Wording here strongly suggests it is the FEG. As the guidance in GM ABM.30(a) below indicates that an ABMO is usually part of a FEG, the BMO name used here should be the name of the Unit or Wing.			Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, the FEG is the normal level for an AM. LSN 166 also refers.
159	ABM.20 (a) GM 1.b.iii	AIR6500	Noting that everywhere else the term 'Service Provision Conditions' used in the first draft has been replaced by 'Operations Specification', should the words also change here? For complete clarity, and noting that the OpSpec will include DASA prescribed operational limitations, it may be worth using the wording '., with the attached Operations Specification, including operational limitations prescribed by DASA.'			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.

160	ABM.20 (a) GM 1.c	AIR6500	Rationale for deleting words '(including ABM service capacity, which baselines the service, capacity, and usage of the ABMSP)' that were at end of sentence in the first draft needs to be explored as capacity and usage influence system design and FIC needs, so absence of this information could result in operationally unsuitable systems being certified.		Education	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. DASA certifies aviation safety, it does not certify operational suitability.
161	ABM.20 (a) GM 1.c.v	AIR6500	Please clarify how the operational limitations will be documented (eg as an attachment to the OpSpec or by revision of the OpSpec).		Clarification	Ready for DD	Yes	closed	DASA has not included the suggestion. Operational limitations is part of the OpSpec as outlined in AMC ABM.20 a.c.
162	ABM.20 (a) GM 1.d	AIR6500	Please clarify who is responsible for preparation of the OpSpec. Does the ABMO draft it for DASA endorsement or does DASA prepare it using information provided by the ABMO?	Preparation of the OpSpec by the prospective ABMO seems most logical as they will have to use that as the basis of the Compliance Statement. In the context of earlier guidance on operational limitations, it would then seem that DASA revises the OpSpec to include limitations when it issues the ABMOC.	Clarification	Ready for DD	Yes	closed	DASA prepares the OPSPEC from the Compliance Statement.
163	ABM.20 (a) GM 2.b	AIR6500	The body of this covers addition of an operation,rather than of a service. Suggest that the title be changed to 'Addition of an operation ...' to align with the text.	Title is inconsistent with content of guidance.	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
164	ABM.30 (a) AMC a	AIR6500	The normal understanding of 'organisational structure' would include only items i to iv listed here. Facilities and processes as listed in items v to viii are enablers and governance mechanisms, so their inclusion under this heading is slightly confusing. Consider breaking this into two parts to avoid the problem.	Apparent inconsistency between AMC and GM on the same topic.	Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated AMC ABM.30 (a) as follows: AMC ABM.30(a) – Organisational Structure (AUS) a. The ABMO organisational structure must include: <i>i. an AM, usually a FEG CDR or equivalent</i> <i>ii. an appropriate chain of command or management</i> <i>iii. appropriately qualified personnel</i> <i>iv. Key Staff with appropriate experience</i> b. The ABMO organisational structure should account for: <i>i. fixed or mobile facilities that are sufficient and suitable for the type of ABMOps provided</i> <i>ii. suitable, documented processes and procedures</i> <i>iii. a Safety Management System (SMS) IAW DASR ABM.40</i> <i>iv. a Quality Management System (QMS) IAW DASR ABM.50.</i>
165	ABM.30 (a) GM	AIR6500	Guidance provided here does not mention items v to viii listed in AMC ABM.30(a) a. This omission supports the earlier comment against that section.	Apparent inconsistency between AMC and GM on the same topic.	Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. LSN 164 refers.
166	ABM.30 (a) GM b	AIR6500	See comment at AMC ABM.20(a) I regarding identification of the ABMO. Need to take a consistent approach throughout in giving examples or explanations of the level at which the ABMO exists.		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion, the FEG is the normal level for an AM. LSN 158 also refers.
167	ABM.50 (a) AMC	AIR6500	The green text copy of ABM.50 above this AMC has 'ABMO must detail a Quality Management System', but the parent/master ABM.50 in Section 2 has ' must utilise ..'. Suggest wording here be corrected to match that in Section 2.	Inconsistent wording of ABM.50	Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has updated AMC ABM.50(a) as follows: 'An ABMO must have a QMS to' in both locations.
168	ABM.60 (a) AMC a. iv.	AIR6500	Intent of this is not clear. It could be interpreted as applying to the structure and layout of the OIP as opposed to requiring that the content align with FVEYS and NATO practices for conduct of ABM. If the intent is to align with practices for conduct of ABM then suggest that this should be included in AMC ABM.20(a) on the Compliance Statement and in particular on the OpSpec. From the AIR 6500 perspective, if the intent is to align with practices for conduct of ABM, then it implies a need for the underlying system to enable the FVEYS and NATO practices and so may affect system design.	Inclusion of system functional requirements in the section on Orders, Instructions and Publications without supporting information in the Compliance Statement and/or OpSpec seems to obscure the likely intent.	Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. The intention is to harmonise operational processes. iv. harmonised with FVEYS and NATO practices as far as practicable Q1 It is intended to apply to operational practices not copy FVEY and NATO OIP layout Q2 Not required in ABM.20 RAAF aims to be interoperable with our allies as a base function Q3 This is as far as practicable not a regulation directing design.
169	ABM.60 (a) AMC a. v.(g)5.	AIR6500	Suggest that this should have the word 'ongoing' added as the first word of the phrase so it reads ' ongoing software safety assurance' to match the approach taken earlier at v.(g)3. for maintenance. Initial system requirements for software are covered by ABM.70 below.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
170	ABM.80 (a) AMC c.	AIR6500	Please clarify if the intent is for the records required here to be stored within the ABM system as opposed to within an ABMO unit administrative system.		Clarification	Ready for DD	Yes	closed	DASA's intent is that the ABMO has a method of recording in place. Outcome based regulation does not specify the method of compliance. c. The ABMO should ensure a method of recording Categorisation, Competency and Currency.

171	ABM.80 (a) GM a.	AIR6500	The last sentence may need revision as it seems unreasonable to expect an individual ABMO to establish a Defence ABM qualification and training system. Suggest that the intent is for the ABM to utilise a Defence ABM qualification and training system that has been established/delivered by a project. For example, there could be a Joint ABM School that is not restricted to a single ABMO.		Clarification	Ready for DD	Yes	closed	SRG runs the ABM course through SACTU Army and Navy members also attend the course
172	Glossary ABMOC	ANSP/AD	Definition of ABMOC uses acronym ABMOP for Air Battle Management Operations (vice correct acronym ABMOps as per new definition/acronym in DASR Glossary)		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
173	ABM.70 (a) AMC	ANSP/AD	Repeats list contained in AMC ABM.60(a)a.v.g Suggest re-wording AMC ABM.70(a) to: "ABMOs should manage ABM Equipment, systems and installations in compliance with the OIP required at AMC ABM.60(a)a.v.g		Clarification	Ready for DD	Yes	closed	DASA has not incorporated the suggestion. The DASR ABM.60 list requires the ABMO to have OIP detailing management of equipment while ABM.70 requires them to USE the that authorised OIP.
174	ABM.70 (a) GM b	ANSP/AD	Repeats what is in the reg at ABM.70(b) Suggest removing to avoid duplication		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has removed the Applicability paragraph.
175	ABM.50 (a) AMC a	HQAC	Suggest insert 'that' in a, b, and d, and delete 'is' in c to make the sentences feel more achievement-like. We consider that it changes the tone and makes it more like an AMC rather than a GM.		Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion.
176	ABM.50 (a) AMC a	HQAC	The MAOs should have a QMS that achieves the following purposes: i. Quality planning. Quality planning that defines the quality policy and approach so as to define standards and meet the safety needs of the MAO ii. Quality assurance. Quality assurance, provided through a quality assurance program, that contains procedures to verify all activities are being conducted in accordance with applicable safety requirements and conforming to specified standards iii. Quality control. Quality control managed by appointed representatives to monitor regulatory compliance of, conformance with, and adequacy of, applicable procedures and services, to ensure safe operations iv. Quality improvement. Quality improvement that consists of reviews and remedial action as appropriate, for the continuous improvement of the safety of the MAO.		Clarification	Ready for DD	Yes	closed	DASA incorporated the suggestion.
177	ABM.20.a	DD FLTOPS	An ABMO applicant organisation must' Is the word organisation needed? It is included in the definition of ABMO		Clarification	Ready for DD	Yes	closed	yes organisation is needed, the O in ABMOC is Operator, Air Battle Management Operator Certificate (ABMOC)
178	ABM.70	DG DASA	Make ABM.70 a placeholder. (As there is no safety case to warrant (DIA led) assurance of equipment standards).		Editorial	Ready for DD	Yes	Closed	DASA incorporated the suggestion. DASA has removed the content of ABM.70 and replaced it with 'DASR ABM.70 - RESERVED.'
179	ABM.80	DASA	* On ABM.80, constrain scope to operators and maintainers. Make it clear that this is a competency and currency management system, not a licencing system. Use AMC to achieve this effect.		Editorial	Ready for DD	Yes	Closed	DASA incorporated the suggestion. DASA has replaced all instances of the term 'personnel' with 'operators and maintainers' in the AMC and GM. Further, DASA added the following text to GM ABM.80.a: <i>b. Scope. The scope of DASR ABM.80 a is constrained to apply only to operators and maintainers (including contractor personnel performing operator and maintainer roles)...</i> <i>d. Note. this regulation is a competency and currency management system. It is not a licencing system.</i>

180	ABM.50	DASA	In progressing the development of purposive regs, the latest evolution of QMS regs (from ANSP.50 and ACD.50) appears to be a regressive change. I agree that organisations (such as an ABMO) must utilise a QMS to achieve consistency, continuity of safe operations through planning, quality assurance, quality control and quality improvement. But I don't agree that a QMS <u>is required</u> to achieve regulatory compliance and conformance. Further, introducing this interdependency within the reg inadvertently adds complexity and potential ambiguity with future O&E activities. As such I would be happy with revised regulatory and GM content that is more closely aligned with ANSP and ACD.			Editorial	Ready for DD	Yes	Closed	DASA incorporated the suggestion. DASA has updated the text of DASR ABM.50(a) to: <i>(a) An ABMO must utilise a QMS to achieve consistency, continuity and compliance of safe operations—through quality planning, quality assurance, quality control and quality improvement.</i>
181	ABM 20 (a) AMC c.ii	DASA	AMC ABM.20(a), para c.ii identifies DASR OP.Gen as applicable; however, the OP.Gen placeholder is being removed in the forthcoming release (see below). Can you please confirm that there wasn't another reg that was intended to be referenced? If not, suggest I just amend the attached to remove AMC ABM.20(a), para c.ii, referencing the DCP that removes the OP.Gen placeholder (which will be approved by the DG) for			Editorial	Ready for DD	Yes	closed	DASA incorporated the suggestion. DASA has removed reference to DASR OP.Gen from AMC ABM.20(a).