



## COMMENT RESPONSE DOCUMENT NPA FOR DCP 2024-001 – DASR SPA.30 ‘AIR DISPLAYS’

### INTRODUCTION

- General.** This Comment Response Document (CRD) summarises DASA’s agreed regulation changes as a result of the Notice of Proposed Amendment (NPA) process to DCP 2024-001 (DASR SPA.30 – *Air Displays*), and finalises public consultation on the NPA. DASA will consider arguments opposing the views expressed in the 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.
- Background.** DASA released NPA 2024-001 for regulated community comment on 23 Aug 24. The period for public comment on the proposals contained in this NPA closed on 20 Sep 24. DASA subsequently consulted with each environmental command HQ and respondent to ensure the DASA responses to NPA feedback were acceptable.

### ANALYSIS OF COMMENTS

#### General

- DASA received 238 responses to NPA 2024-001. The comments are individually listed in Annex A together with their corresponding DASA response.

#### Environmental command endorsement positions

- Environmental command HQs advised the proposal was acceptable, however would be improved if DASA made the changes detailed in Annex A.
- 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

- Environmental command HQs advised that additional resources are not required as a result of NPA 2024-001.
- Transition plan.** DASA incorporated a 12-month transition period, commencing on the date of publication of *DASR SPA.30*. 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.30* when conducting oversight activity during the transition period. DASA will consider extensions to the transition period on request.



## AUTHORITY

8. The content of this CRD has been reviewed and is authorised.

### **B. Collenette**

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### **Annex:**

A. NPA 2024-001: *DASR SPA.30 'Air Displays'* – Regulated Community Feedback



DASR SPA.30 Air Displays Comment Response Document

LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
1	CSG OPAW Mgr	AMC SPA.30(c)3iii. a.v(c)	* Suggested amendment - replace all instances of 'UAS Operator' with 'Certified and Type A UAS Operators'.	1) Existing DASR.UAS places sufficient limitations on Open Category and Specific Type B category operations that ensure Air Display-related Hazards are mitigated SFARP (primarily GP/MEP seperation requirements) 2) further limitations are not commensurate with the risk posed by Open Cat and Type B operations 3) the proposed additions are antithetical to the capability model of UAS, in particular it implies competency requirements that go beyond what is achievable by CSG RPs	DASA retained the term 'UAS Operator' and hence applicability for all UAS categories.  However, DASA amended AMC SPA.30(a)3i.b.b.ix as follows:  <i>(c) for UAS:</i> <ol style="list-style-type: none"> <li>1. that are Certified UAS, 200 m</li> <li>2. that are Specific Type A UAS and Specific Type B UAS with an MTOW of 25 kg or less, existing operational controls published in an approved ATMP or ATOUAS with specific reference to separation from crewed Aircraft and General Public</li> <li>3. with an MTOW greater than 25 kg; or where no specific separation standards are published, 200 m.</li> </ol> Rationale: <ol style="list-style-type: none"> <li>1. DASR UAS does not contain sufficient hazard controls for Air Displays. For example: <ol style="list-style-type: none"> <li>a. for Micro UAS, there are no requirements or limitations when operating near General Public (GP) or Mission Essential People (MEP)</li> <li>b. for Very Small UAS, the requirement is to employ suitable risk controls when operating within 30 m horizontally of GP/MEP. There are no requirements when operating over GP/MEP</li> <li>c. DASR.UAS is absent many of the other controls that mitigate Air Display-related Hazards (eg Crew Currency, rehearsal requirements, and Flight conduct and manoeuvre limitations).</li> </ol> </li> <li>2. DASR SPA.30 controls are scalable. For example, UAS Operators should select the Air Display RP based on their skill and experiece. However, the amount of skill and experience should be proportional to Aircraft performance, type of Air Display, Display Sequence and Display Area.</li> <li>3. DASR SPA.30 provides flexibility for UAS Operators (eg AMC typically uses the term 'should'). AMC typically uses 'should' which is used to imply an act or process identified for inclusion in a desired outcome is complied with unless sound reasoning may determine otherwise. Where MAOs and UAS Operators have 'sound reasoning' not to comply, then any such reason will be subject to separate assessment by DASA.</li> </ol>
2	HQ FAA	Glossary	Change "qualified display Flight Crew" to "qualified Display Crew"	Consistency of wording with regards to Display Crew	DASA replaced 'qualified display Flight Crew' with 'qualified Crew'.
3	HQ FAA	AMC SPA.30(c)1i	Change "select crew" to "select Display Crew"	Consistency of wording throughout AMC SPA.30(a)2	DASA amended the AMC to ' <i>MAOs and UAS Operators should define selection criteria for Display Crew, FLTAUTHO, ADD and DFS</i> '

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
4	HQ FAA	AMC SPA.30(c)1ii.b GM SPA.30(c)1ii.f	Change "plus 500 feet" to "plus 500 feet for fixed wing and plus 100 feet for rotary-wing"  [To regain Currency, MAO and UAS Operators should require the Display Crew to: (a) if the Display Crew has performed the Display Sequence in the preceding 31 to 60 days, perform the Display Sequence at the: relevant approved minima plus 500 feet, and then relevant approved minima. (b) if the Display Crew has performed the Display Sequence in the preceding 61 to 90 days, perform the Display Sequence at the: relevant approved minima plus 1 000 feet, and then relevant approved minima plus 500 feet, and then relevant approved minima.]	Helicopter Display Flying profiles are constrained visual manoeuvres and heavily defined by ground markers. Conducting Helicopter Flying Displays at equal to or greater than 500 feet AGL would be considered unsafe and could place the helicopter in the avoid curve.	DASA amended AMC SPA.30(a)2d and added AMC SPA.30(a)2e as follows:  <b>d. Currency. MAOs and UAS Operators should:</b> i. for Display Crew, define: (a) Currency requiring Display Crew to perform the Display Sequence in the preceding 30 days at the relevant approved minima (b) requirements to regain Currency if the Display Crew has not performed the Display Sequence in the preceding 30, 60 and 90 days (c) methods for regaining Currency which include: 1. training to regain Currency conducted IAW AMC SPA.30(a)2e 2. requiring the Crew to fly an approved Display Sequence  ii. for ADD: (a) ensure the ADD has acted as an ADD at an Air Display at least once in the preceding two years (b) establish methods to regain Currency. <sup>1</sup> MAOs and UAS Operators should refer to AFHQ AST OIP when establishing methods for ADD to regain Currency.  <b>e. Skills training. Display Crew Competency and Currency skills training should:</b> i. maximise the use of FSTD ii. initially be conducted: (a) in familiar environments (eg over the Crew's own Aerodrome) (b) at higher heights, then progressively reducing height to the minimum approved Display Flying limitation, with the exception that this requirement does not apply to rotary-wing Aircraft if the requirement would: 1. require the rotary-wing Aircraft to operate in the avoid area of the height-velocity diagram 2. degrade Crew visual cues necessary for low speed manoeuvring  Additionally, DASA added the following as GM SPA.30(a)2i:  <b>i. Display Crew Currency. An exemplar method for Display Crews to regain Currency is that if the Display Crew has not performed a Display Sequence in the preceding:</b> i. 31 to 60 days, the Display Crew conduct a Display Sequence at the: (a) relevant approved minima plus 500 feet, and then (b) relevant approved minima. ii. 60 days, the Display Crew conduct a Display Sequence at the: (a) relevant approved minima plus 1000 feet, and then (b) relevant approved minima plus 500 feet, and then (c) relevant approved minima.
5	HQ FAA	AMC SPA.30(c)1ii.b GM SPA.30(c)1ii.f	Change "plus 1000 feet" to "plus 1000 feet for fixed wing and plus 200 feet for rotary-wing" and change "plus 500 feet" to "plus 500 feet for fixed wing and plus 100 feet for rotary-wing"	Helicopter Display Flying profiles are constrained visual manoeuvres and heavily defined by ground markers. Conducting Helicopter Flying Displays at equal to or greater than 500 feet AGL would be considered unsafe and could place the helicopter in the avoid curve.	LSN 4 refers.
6	HQ FAA	Glossary	Minimum Separation Distance (MSD) is a new term and needs to be defined in the Glossary.	Height Above Obstacle Within (HAOW) is the only term used in current SPA.30.	DASA added the following benchmarked term for 'Minimum Separation Distance (MSD)' to the DASP Acronym List and Glossary:  <b>Minimum Separation Distance.</b> The authorised minimum separation, in all directions, between any part of an Aircraft in Flight and the ground, water or Obstacle. MSD applies when flying at less than 2,000 ft above the surface, and does not apply during take-off or landing or to the separation between Aircraft in the same formation.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
7	HQ FAA	N/A	Depending on definition of MSD. Change "minimum of 50 feet MSD" to "minimum of 50 feet HAOW 100m"	MSD not defined. HAOW is the current terminology referenced during Display Flying.	DASA did not incorporate the suggested change. However, DASA defined MSD (LSN 8 refers).
8	HQ FAA	N/A	Delete "Low level Runs or"	Low level runs are not defined nor a subset of air displays.	DASA incorporated the suggested change.
9	HQ FAA	AMC SPA.30(c)3iii. a.iii(b)2	Change "minimum of 100 feet MSD" to "minimum of 100 feet HAOW 100m"	MSD not defined. HAOW is the current terminology referenced during Display Flying.	DASA incorporated the suggested change and included a low-energy 50ft MSD distance.
10	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(c)1ii.a	Remove reference to a Display Flying Qualification	This implies that display flying is a separate skill set but in the Army context that is unlikely to be the case. Creating a Display Flying Qualification is not necessary and creates an undue admin burden.	DASA amended AMC SPA.30(a)2c as follows:  c. <b>Competency.</b> MAOs and UAS Operators should implement Competency requirements for Display Crew, FLTAUTHO and ADD which: i. reference the applicable Learning Management Plan (LMP, if implemented) ii. for Display Crew: (a) includes both knowledge and skills training and assessment (b) is conducted by a Flight Instructor (c) ensures the candidate: 1. can fly the published Display Sequences safely and effectively 2. is proficient in identifying conditions to cease a display manoeuvre and performing the subsequent manoeuvres to maintain safe flight thereafter
11	A/SO1 STDS HQ AVNC OMD	GM SPA.30(c)1ii.a	Remove reference to an LMP	This will be interpreted as a discrete Display Flying LMP which is not needed for Army. The key is that the individuals are trained and assessed as competent for the flying sequence, which is well covered under c ii. For the ADD, c iii clearly states the training requirement.	DASA retained the reference to LMP. LSN 10 refers. However, DASA added the following GM at GM SPA.30(a)2f:  <i>MAOs and UAS Operators need not develop a discrete Display Flying LMP. Where Display Crew are trained and assessed as competent to fly the Display Sequences as part of basic or other qualifications, the applicable LMP for this training will suffice.</i>
12	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(c)ii.a.i i©2	Remove "published" and amend "escape manoeuvres" to relevant contingency procedures.	Not sure what the intent of Display Sequences being published is, but seems likely to be aerobic related, as does the reference to escape manoeuvres. Army won't have published Display Sequences, it depends on the task. The reference to escape manoeuvres could be broadened to be more relevant.	DASA retained the word 'published' and replaced 'escape manoeuvres' with 'identifying conditions to cease a display manoeuvre and performing the subsequent manoeuvres to maintain safe flight thereafter' (LSN 10 and 108 refers).  Air Display risk and Display Crew workload increases if Display Sequences are modified while mid-display. Publishing Display Sequences ensures: a. consideration of risks associated with each manoeuvre are included in the development of a Display Sequence b. Display Crew fly are not making significant modifications to the Display Sequence airborne c. consideration of risks associated with each manoeuvre can be included in the development of a Display Sequence d. a consistent approach is developed to training and preparing Crew for Display Flying e. Crew workload is reduced, and crew cohesion is improved, collectively improving the ability to mitigate other human performance limitations.  DASA amended the last sentence in GM SPA.30(a)3ii.a as follows:  <i>Publishing Display Sequences and Display Crew rehearsal of the standard manoeuvres and published Display Sequences offers the following advantages:</i>
13	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(c)1ii.b GM SPA.30(c)1ii.f	Some options are: Include a dispensation for Army with respect to reducing height limitations; or make this fixed wing only; or remove the reducing height requirements and perhaps put it in guidance material for fixed wind. Ideally for Army this would say that currency requires a rehearsal of the display in the preceding 30 days.	The gradual reduction of height limitations is obviously aerobatics related. Having this as the AMC is very problematic for Army because we will be forced to be non-compliant and then will have to justify an alternate position. It would reduce the burden if this was written so we could be compliant. No issue with the concept of being current at all. Our displays will always include a rehearsal prior as part of the risk management anyway.	LSN 4 refers.

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14	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(b)2a.ii	Remove the requirement for published weather minima. If necessary put a specific requirement under Environmental Threats to consider amended weather minima as part of risk management.	Altering weather minima is very task and location dependent. Generic published adjustments won't value add. The key is that weather is considered in risk management and we apply specific limitations based on the activity. I think this risk is already addressed through the required consideration of environmental threats, but if need be include in SPA.30(a)1 a i "environmental threats and weather minima".	DASA retained the requirement for published weather minima. This is an extant SPA.30 requirement and consistent with best practice as applied by DASA-recognised CAAs and MAAs.
15	A/SO1 STDS HQ AVNC OMD	N/A	Not relevant for rotary, but we can comply!		DASA notes the response.
16	A/SO1 STDS HQ AVNC OMD	N/A	Remove "type of Air Display" from the first paragraph in this section.	This section details requirements for minimum separation between the Crowd Line and Display Line. By definition, the Display Line only applies to Display Flying. So there is no requirement to consider the type of Air Display because the lateral separation requirement does not apply to Flypasts. Additionally, there should not be any lateral separation requirement for Flypasts because this would be prohibitive. Every Anzac Day flypast goes over the crowd and this can't be avoided. The risk is minimised through the lack of manoeuvring, rehearsal, aircrew experience, heights, single engine performance, etc.	DASA incorporated the suggested change.
17	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(c)3iii. a.x	Amend "Display Crew should rehearse the Standard, Alternate, and Special Venue Display Sequences." to "Display Crew should rehearse all planned and contingency display sequences."	Army won't have Special Venue Display Sequences. Keep the intent but generalise it to cover all sequences that might be needed.	DASA incorporated the suggested change.
18	A/SO1 STDS HQ AVNC OMD	AMC SPA.30(c)3iii. a.v(b)	Include "static hover" in the 65m lateral separation so that it reads "65 m without an underslung load, and 100 m with an underslung load; during normal take-off, landing, static hover and transitional manoeuvres"	Hover displays might include hoisting or roping. Without explicitly stating the lateral separation for a static hover there might be some confusion around whether to apply 65m or 200m.	DASA incorporated the suggested change.
19	A/SO1 STDS HQ AVNC OMD	N/A	LTCOL Phillips/SO1 OPAW C (UAS) has no issue with the NPA as long as it only remains applicable to Specific Type A UAS managed through DASR.UAS.30(b)(5). i.e. where identified in a relevant DASR Form 152 and UASOP. He is not keen to over complicate Specific Type B and Open Category operations with a regulation that would not improve the safe operation of those UAS.		LSN 1 refers.
20	HQ SRG A9	DASR SPA.30(b) DASR SPA.30(c)	Separation of collated 'Air Displays' back to Flypasts and Flying Displays.	Separation between the two categories provides clarity on individual applicability, clarifies some of the below questions, and means 'Flypasts' would be more achievable for the SRG units to comply with (if the new Flying Display requirements remain in place).	DASA notes the comments (LSN 20, 21 and 23) regarding complexity of the regulation and the lack of separation of Flypast and Display Flying controls into sub-parts. DASA restructured the proposed regulation accordingly.

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21	HQ SRG A9	DASR SPA.30 (General)	Of note, SPA.30 has gone from 6 pages of regulations to 30 pages of regulations. This means that the regulation (including the combination of Flypasts and Flying Displays under 'Air Displays') is far too complex and detailed for units to implement safely/well. Suggest a reduction of regulations to absolute minimum to ensure safety requirements are met (particularly the AMC/GM sections) and anything extra would be best placed in a separate 'guidance' document.	Appears to be taking a lot of trust out of the system/training (i.e. convoluted requirements telling qualified captains, crews, FLTAUTHOs how to do their job rather than allowing for autonomy as trusted, trained and qualified military operators).	DASA notes the response.  AC SI modernisation program has required a number of controls to be added to DASR SPA.30, as it would be inappropriate to place these controls at MAO level.  SPA.30 has been reduced to the minimum to sufficient Defence regulation for the effective management of Hazards associated with Air Displays. SPA.30 Part, AMC and GM ensure implicit controls are now explicit, and provide sufficient guidance that captures the broad scope of Air Displays, as well as for the variation in experience within the regulated community.  Incorporated changes in this CRD reduce the content further. Additionally, DASA will consider a minor update to DASR SPA.30 post publication of the PAAARM - Display Flying volume with a view to removing duplication.  However, DASA has restructured SPA.30 (LSN 20 refers) reducing the complexity and removing duplication.
22	HQ SRG A9	DASR SPA.30 (General)	UAS Operators - continuous reference to UAS Operators. How applicable is this to the regulations?	At this stage, appears to be adding extra verbage and confusion throughout an already verbose regulation.	SPA.30 is applicable to both MAO and UAS Operators. Hence, the term 'UAS Operators' is incorporated throughout. LSN 1 refers.
23	HQ SRG A9	DASR SPA.30 (General)	GM and AMC sections are extremely verbose and include repeated information throughout. Suggest reworking to include only relevant safety requirements (as per above recommendation).	This detracts from the actual 'regulation' requirements that the units should be able to easily interpret and apply to improve safety.	LSN 21 refers.
24	HQ SRG A9	N/A	Sections rely very heavily on the C-130 ASR recommendations, some of the recommendations are not applicable or relevant across units.		DASA notes the comment.  The C-130J ASR is indicative of why Air Display controls are required. The recommendations (and the relevant controls in SPA.30 derived from them) are relevant across FEGs, perhaps moreso for those FEGs that infrequently conduct Air Displays.
25	HQ SRG A9	GM SPA.30b	Applicability - does this mean that all requirements (i.e. FPAP, FLTAUTH, DFS, etc.) are required to be completed for the rehearsal flights too?		All requirements are applicable to rehearsals. The rehearsal forms part of the Air Display. The extant AE679 (FPAP) requires the rehearsal plan to be documented and approved. All flights, including rehearsals should be authorised. A DFS should be appointed for rehearsals were required.
26	HQ SRG A9	GM SPA.30d	Display Flying Supervisor (DFS) is an extremely onerous position on the individual, the unit, and the Air Force. Trained and qualified FLTAUTHOs should be able to AUTH IAW the unit's published limitations which is based on their formal training and experience.	The DFS extra requirements (i.e. following the crew through the entire planning, preparation and execution) is completed via the FPAP, crew selection, crew planning, RM training and FLTAUTH. Statements, such as, 'preparation and training of the Display Crew requires near continuous supervision' are not fit for practice/regulation.	MAOs and UAS Operators need only appoint a DFS for Display Teams. Display Teams are defined as 'a formation or group of Aircraft, flying as one single Display Flying act'. There are unlikely to be many Display Teams formed within Defence outside of AFTG (the Roulettes) who have already implemented this requirement. Therefore, this is not an onerous position on the individual, the unit, and the Air Force.  Note: As per the definition, the DFS and FLTAUTHO may be the same person.  DASA has amended the definition of Display Team as follows:  <i>A formation of Aircraft conducting Display Flying as one single 'act'.</i>
27	HQ SRG A9	GM SPA.30d	Display Crew - requires an additional definition of 'Crew', 'Display Flying' and 'Flypast' to differentiate between the definitions and requirements mentioned throughout the rest of the regulation.		LSN 83 refers.  Additionally (and following discussions with HQ SRG A9) the definition for Display Box was amended (LSN 69 refers) to clarify that the Display Box need not be surveyed as per the requirements for a Surveyed Area (ie flown in VMC by day to identify and record hazards and obstacles).

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28	HQ SRG A9	DASR SPA.30 (General)	Secondary Spectators - fairly irrelevant concept for most units and is referenced multiple times throughout. Reduce the number of references or compile the 'Secondary Spectator' into its own category for ease of application.		DASA has not incorporated the suggestion. Secondary Spectators are likely to be relevant to all Air Displays.  LSN 48 refers.
29	HQ SRG A9	AMC SPA.30(c)1ii.c	Regulations make no reference to regaining currency in a Flight Simulation Training Device (FSTD). Suggested that, where an FSTD is appropriately certified, that currency and qualification be made available in a FSTD vice the actual aircraft.		MAOs and UAS Operators should maximise the use of Flight Simulation Training Devices (FSTD) for skills-based qualification training (AMC SPA.30(c)1ii.c refers).  AMC defining Currency requirements has been rewritten as per LSN 4 which now references the use of FSTD.
30	HQ SRG A9	AMC SPA.30(c)2a	Selection of FLTAUTHO for Display Flying - units currently assign the Flypast/Flying Display AUTH to the CO/OC (position) which is not category or qualification specific. Similar to DFS point (above) regarding unit selection/delegation of FLTAUTHO autonomy.		MAOs and UAS Operators should appoint Air Display FLTAUTHO based on their skill and experience, which for Display Flying includes that the FLTAUTHO holds or previously held a Display Flying qualification. This requirement does not prevent unit selection/delegation autonomy, or preclude the OC/CO from being assigned as the FLTAUTHO for Air Displays.  DASA replaced 'Flying Displays' with 'Display Flying' in AMC ORO.30(a)3a.xiv(b)iv.
31	HQ SRG A9	GM SPA.30(c)1ii.a	Learning Management Plan (LMP) - is there a training package required for the 'Display Flying' qualification?		LSN 11 refers.
32	HQ SRG A9	AMC SPA.30(c)1ii.b GM SPA.30(c)1ii.f	Currency outside of 90 days - 'regain privileges of the qualification' does this mean that the pilots lose the qualification entirely?	The currency requirements for the qualification is confusing. Should be able to rehack the currency in the FSTD + sounds like you lose the qualification entirely with the current wording.	LSN 4 refers.
33	HQ SRG A9	GM SPA.30(b)1c	Multiple Flypasts in a Single Sortie - this limits multiple passes to only flying displays. This creates a large burden on the units to comply with the stricter regulations (i.e. if they are conducting one flypast, followed by a 180 degree level turn, to flypast again). For example, and IAW AMC SPA.30(a)3ib, this would mean that a TRA would be required to be stood up.		Multiple Flypasts in a Single Sortie are not limited to only Display Flying. Amendments to GM (LSN 153 refers) clarifies that if any manoeuvres or formation changes necessary to reposition for subsequent Flypasts are conducted in proximity to and in full view of Spectators, then such an activity may constitute Display Flying. Therefore, an Aircraft conducting one Flypast, followed by a 180 degree level turn, to Flypast again would not need to establish all the controls (ie establish a TRA) provided the 180 degree level turn is not conducted in proximity to or in full view of Spectators. Further, if MAOs determine this activity constitutes Display Flying, then controls are scalable to the activity.
34	HQ SRG A9	AMC SPA.30(b)2iv	Height Limitations - units are not going to be in a position to 'survey' an area IAW the DASA definition for a flypast. Suggest further assessment on 500ft HAOW 600m for an un-surveyed location.	This limitation is an increase on the current limits (i.e. non-aerobatic manoeuvres - low level runs or flypasts may not be conducted below 200ft HAOW 600m). Also, of note, limitations have not been changed for rotary aircraft. Fundamentally, IAW the regulation, an air display is for the purpose of displaying defence aviation professionalism and capabilities. A civilian aircraft can fly to 500ft AGL over a non-built up area without any regulatory overhead, as such, are we demonstrating our military professionalism and capability if we are limited to the same level as any other fixed wing civilian pilot?	LSN 45 refers.  Extant SPA.30 requires the MAO to use SRM to determine appropriate lateral safety distances, requiring MAOs and UAS Operators' to conduct route-related pre-Flight planning ('surveying' the Display Area and Flypast route). Similarly, the draft SPA.30 requires MAOs and UAS Operators to conduct pre-Flight SRM of the Display Area and Flypast route. Therefore, SPA.30 is not introducing additional or inappropriate SRM.
35	HQ SRG A9	SPA.30(c)3iv	Emergency Response Plan - confirm the requirement for an ERP for every air display (including a flypast)?	Unsure how this is a MAO responsibility to create an ERP for the display location (particularly if it is for a flypast in a small town location)?	The ERP is a scalable control. MAOs and UAS Operators need not develop a discrete ERP for Air Displays. Where other ERPs are in place (eg a base ERP for an Air Display at a Defence base) this ERP will suffice provided it is appropriate to the scale of the event (GM SPA.30(a)3ii.e provides additional guidance).
36	HQAC	GM SPA.30d.vi	There is a different definitions for 'training' and 'rehearsal'. Recommend add "training and". "Suitably qualified and experienced person selected by the MAO or UAS Operator to supervise Display Crew during their <b>training and rehearsal periods.</b> "		LSN 40 refers.



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37	HQAC	GM SPA.30(c)3ii.b	Recommend removing the example of the four-g vs six-g turn. Recommend: "For example, a 'little less than' maximum AOB / higher rate-four-G turn looks just as tight as a maximum AOB six-G turn from the ground, and the general public are unlikely to detect the difference. However, reducing the AOB G also reduces risk by providing a safety margin if the turn needs to be tightened."	If the example must remain, suggest rewording for a non-FJ or PC-21 audience. The most problems that we (the ADF) have had with 'tight turns' has been transport type aircraft committing to a 2.2 g turn with an on-crowd wind, and being unable to avoid busting the crowd line.	DASA incorporated the suggested change, amending GM as follows:  <i>For example, reducing bank or G in a turn looks just as tight from the ground as flying a maximum bank or G turn, and the general public are unlikely to detect the difference. However, reducing the G provides a safety margin if the turn needs to be tightened and from the physiological effects of acceleration.</i>
38	HQAC	AMC SPA.30(c)1ii.c	Comment. Inappropriate mix of 'altitude' and 'height'.  Suggest. " commence at higher altitudes heights and progressively reduce in height to the minimum approved Display Flying altitudes height.		DASA incorporated the suggested change.
39	HQAC	AMC SPA.30(c)2a.ii i	The inference is that a single aircraft/solo display does not require appointment of a DFS. Is this the intent?		MAOs and UAS Operators should appoint a DFS for Display Teams. Although not a SPA.30 requirement, it is a scalable control and MAOs and UAS should consider appointing a DFS where Crew experience, Aircraft performance, complexity of the Air Display, or Display Sequences warrant it (eg solo low level aerobatic Display Flying).
40	HQAC	GM SPA.30(c)1i.d	GM SPA.30 c viii. DFS definition. "Suitably qualified and experienced person selected by the MAO or UAS Operator to supervise Display Crew <b>during their rehearsal period.</b> "  GM SPA.30 a 2e. DSF Selection. "However, given the heavy demands on time, particularly <b>during initial</b> Display Crew <b>training</b> , it may be beneficial to appoint a non-executive pilot as DFS."  There needs to be more consistency in descriptions, or deliberate use of both 'training' and 'rehearsal', as they are theoretically different things.		DASA amended all applicable references to 'training and rehearsal' as suggested.
41	HQAC	N/A	Query: What is 'dynamic SRM'?		DASA deleted the word 'dynamic'.
42	HQAC	GM SPA.30(c)2f	DFS. Comment as per above for 'rehearsal' v 'training'. DFS acts as ..... safety observer for each Display Flying <b>rehearsal.</b> " The next sentence states "Preparation and <b>training</b> of the Display Crew requires near continuous supervision."  Recommend consider replacing 'rehearsal' with 'training'.		LSN 40 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
43	HQAC	GM SPA.30(b)1c	<p>At 'c'. "If any manoeuvres or formation changes necessary to reposition for subsequent Flypasts are conducted <b>in proximity to and in full view of Spectators</b>, then such an activity would constitute <b>Display Flying</b> ...."</p> <p>At 'd'. "<b>controls are scalable</b>. ..... linked by simple <b>non-dynamic</b> manoeuvring (and where appropriate formation changes) then the required Crew selection, rehearsal, etc is <b>limited</b>."</p> <p>Recommend reconsidering the boundary between Flypast and Display Flying, or clarify depth and breadth of paperwork to support.</p>	<p>Example. P-8 doing a non-dynamic procedure turn to reverse direction for a second flypast, that just happens to be in full view of the spectators, etc., is now Display Flying. The paperwork trail (the RMP / FPAP detail) to support this Display, which is scalable, but needs to exist, is now disproportionate to the value it adds. Display Flying requires theory and practical training (scalable), reference to an LMP, assignment of a DFS, etc., etc.</p>	<p>LSN 153 refers.</p> <p>Additionally, SPA.30 does not prescribe the 'depth and breadth of paperwork' necessary for each Hazard control. Hazard controls are scalable meaning the supporting documentation is commensurately scalable. Under extant SPA.30, Display Flying and Flypasts require the application of SRM—including Air Display-generic Mission Risk Profiles (MRP) and documented Risk Management Plans (RMPs) specific to each Air Display—and approvals (eg through submission of an FPAP). This requirement has not changed.</p>
44	HQAC	GM SPA.30(b)1c	<p>"However, these Hazard controls are scalable. .... Conversely, for a display of comparable complexity to a Roulette display, then the rehearsal should be comprehensive, the Crew selection demanding, etc."</p> <p>The sub-section ( b to e ) is talking about multiple flypasts linked by non-dynamic manoeuvres. This cannot be "of comparable complexity to a Roulette display". Recommend this example be removed or changed.</p>		<p>DASA retained the example.</p> <p>Rationale: The two examples serve to highlight the scalability of risk controls based on Flypast complexity.</p>
45	HQAC	AMC SPA.30(c)3iii. a.iii	<p>"Display Flying. Display Flying may be performed down to 500 feet HAOW 600m outside a Display Box or over an unsurveyed location; or 200 feet Minimum Separation Distance (MSD) for non-aerobatic Display Flying conducted in a Display Box or at a location surveyed for low-level operations."</p> <p>There is no minimum height stated for aerobatic display flying in a display box.</p>		<p>DASA amended AMC SPA.30(a)3i.b.iv(a)1 as follows:</p> <p><b>1. Display Flying, including aerobatic Display Flying, may be performed down to 500 feet HAOW 600m; or 200 feet Minimum Separation Distance (MSD) for non-aerobatic Display Flying conducted in a Display Box or at a location surveyed for low-level operations.</b></p> <p>LSN 160 and 162 refers: 1. MAO and UAS Operators may conduct a Flypast at 200 feet HAOW 600m without survey - provided the Display Crew prepare detailed plan including understanding of obstacle locations.</p> <p>2. Accordingly, DASA amended AMC SPA.30(a)3i.b.iv(a)2 as follows:</p> <p><b>2. Flypasts may be flown not below 200 feet HAOW 600 m outside a Display Box or over an unsurveyed location; or 200 feet MSD in a Display Box or at a location surveyed for low-level operations.</b></p> <p>3. However, DASA does not support removing prescription of minimum HAOW and MSD from DASR—as the MSD and HAOW DASA have included are based on best Defence aviation practice (AFTG and ACG) in high performance Aircraft. Further, prescribing such minimum HAOW and MSD is consistent with best practice regulators (eg UK MAA). Further still, nothing in DASR SPA.30 precludes AC, a MAO or UAS operator from imposing more restrictive MSD or HAOW requirements for, say, a large transport Aircraft.</p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
46	HQAC	AMC SPA.30(c)3iii. a.iii	<p>Comparison of limitations for fixed wing and rotary wing.</p> <p>Comment. From an <b>AMC</b> perspective how is a wingover in a military helicopter (100' HAOW 100m and not necessarily within a display box) more safe than a wingover in a PC-21 (500' HOAW 600m when outside a display box).</p> <p>From an AMC perspective, how is a flypast in a ARH at 100' more safe than a flypast in a PC-21?</p>	<p>While these may be historic norm's, AMC should not allow this magnitude of discrepancy.</p> <p>Acknowledge that most FW are less manoeuvrable than the PC-21, though the scale of the buffers for the TAS being flown seems disproportionate.</p>	<p>DASA included MSD and HAOW that are based on best Defence aviation practice (AFTG and ACG) for fixed-wing Aircraft and the extant SPA.30 requirements for rotary-wing Aircraft. Further, prescribing such minimum HAOW and MSD is consistent with best practice regulators (eg UK MAA). Further still, nothing in DASR SPA.30 precludes AC, a MAO or UAS operator from imposing more restrictive MSD or HAOW requirements for, say, rotary-wing Aircraft.</p> <p>Additionally, DASA amended AMC SPA.30(a)3i.b.iv.a as follows:</p> <p><i>(a) for fixed-wing Aircraft:</i></p> <ol style="list-style-type: none"> <li>1. 500 feet HAOW 600 m where Display Flying includes aerobatic manoeuvres</li> <li>2. 200 feet MSD for non-aerobatic Display Flying conducted in a Display Box or at a location surveyed for low-level operations</li> <li>3. 200 feet HAOW 600 m for non-aerobatic Display Flying conducted outside a Display Box or at an unsurveyed location</li> </ol> <p>Further, DASA amended AMC SPA.30(a)3ib.b.v as follows to clarify that lateral safety distances should consider rotary-wing Aircraft energy and debris scatter (eg rotor blade):</p> <p><i>iv. Safe distances from Spectators. MAOs and UAS Operators should publish minimum lateral safety distances between the Crowd Line and Display Line appropriate to Crew experience, and Aircraft performance and debris scatter patterns following catastrophic failure, collision or CFIT. Lateral safety distances should not be less than:</i></p>
47	HQAC	AMC SPA.30(c)3iii. a.v(c)	<p>The inclusion of a 600m distance for HAOW is seen to add unnecessary and often nugatory workload during planning.</p>	<p>Example. The ATC tower at Avalon is within 600m of the centrepont run-in for aircraft arriving from behind the crowd. As per the comment above, the pilot of the single aircraft, in erect flight, at no more than 300kts, while positioning to start a display, will identify an obstacle that may be a hazard and may then be a risk.</p> <p>The effort of clearing this area during planning or negotiating with AMs/ADDs is grossly disproportionate to the risk.</p>	<p>LSN 160 and 162 refers.</p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
48	HQAC	AMC SPA.30(c)3iii. a.iv	<p>"The Display Crew must plan the Display Line to provide the minimum lateral separation from Spectators and foreseeable Secondary Spectators (eg if there is a public road that passes next to the display venue boundary then that is a likely location for Secondary Spectators)."</p> <p>Is it the intent that for the next on-base airshow at RAAF Richmond, the display line 'must' be approx 700m from the crowd line? How many Secondary Spectators are necessary for them to be the reason for a cancelled display ("... must not commence ....")("... must knock it off")?</p>	<p>The intent and historic rationale is acknowledged and understood. Differing interpretations between individuals will see this as a point of contention.</p>	<p>DASA notes the comment. Display Crew must plan to avoid areas where groups of Secondary Spectators are likely to gather. Therefore, DASA:</p> <p>a. removed the first sentence from AMC SPA.30(a)3ib.b.ix; and</p> <p>b. combined that sentence with AMC SPA.30(a)3ib.b.ix, amending the AMC as follows:</p> <p><i>iii. <b>Avoiding Spectator and Secondary Spectator areas.</b> MAOs and UAS Operators should ensure Display Crew avoid manoeuvres over:</i></p> <p><i>(a) Spectator areas without MAO-AM or UAS Operator approval, unless the manoeuvre is a single Aircraft in erect Flight, not below 500 feet HAOW 600 m, when positioning for the beginning of, or on departure from, a Display Sequence</i></p> <p><i>(b) foreseeable areas that Secondary Spectators are likely to gather.</i></p> <p>Further, DASA added the following text (benchmarked against UK MAA RA2335) providing flexibility for when overflight of Secondary Spectators is unavoidable:</p> <p><i>vi. MAOs and UAS Operators should provide guidance to Crews that:</i></p> <p><i>(a) ...</i></p> <p><i>(b) the presence of Secondary Spectators may not automatically require an Air Display to be curtailed or abandoned; Crew should use their judgement to assess the risk against the mitigations taken and satisfy MAOs and UAS Operators that risk to Secondary Spectator safety is eliminated, and if not reasonably practicable to eliminate, to minimise risks SFARP.</i></p>
49	HQAC	AMC SPA.30(c)3iii. a.x	<p>The GM appears to be focussed on preparing a trained and qualified pilot/crew for a specific event which is complicated enough to require a rehearsal, including selecting which Display Sequence is to be used (ie., Standard or SV).</p> <p>The AMC asks the pilot/crew to rehearse the Standard <b>and</b> SV sequences, which is implausible.</p> <p>Also, there are distinct though probably overlapping definitions for 'training' and 'rehearsal'.</p> <p>The message becomes mixed at AMC xi, a , where "Display <b>rehearsals</b> should be documented in OIP to ensure a standardised approach to <b>training</b> ....".</p> <p>Recommend delete 'training and'. "Display rehearsals should: (a) be documented in OIP to ensure a standardised approach to <b>training and</b>-preparing Display Crew".</p>		<p>LSN 17 and 40 refers. DASA amended AMC SPA.30(</p> <p><i>Display Crew should rehearse all planned and contingency Display Sequences. Display Flying Rehearsals should:</i></p> <p><i>(a) be documented in OIP to ensure standardised Crew preparation</i></p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
50	HQAC		<p>AMC. "Air Display Handling Notes that document: (b) altimeter setting procedures for Air Displays, including using QFE for Display Flying"</p> <p>The GM for this item has the sentence "All low-level Air Displays should use QFE".</p> <p>Recommend the addition of a NOTE for the AMC. "(b) altimeter setting procedures for Air Displays, including using QFE for Display Flying. NOTE. Manoeuvres necessary to reposition between multiple Flypasts that are conducted in proximity to and in full view of Spectators constitute Display Flying and may benefit from the use of QFE".</p>		DASA incorporated the Note as GM. Regulatory Style Guide convention is that the note as written could not be included as AMC.
51	HQAC	Glossary	<p>Flypast* (modified) A subset of an Air Display whereby a flight of one or more Aircraft is tasked to pass over a specific location <del>on a constant track and at a constant height</del> at a specified time.</p>	Delete reference to constant track and constant height. For a number of high profile flypast locations, it is not practical to maintain constant track (eg River Fire Brisbane) or constant height (eg War Memorial Canberra).	<p>DASA retained the definition of 'Flypast' which is consistent with best practice as applied by DASA-recognised CAAs and MAAs.</p> <p>Retaining the words 'on a constant track and at a constant height' prevents a liberal and incorrect interpretation of the definition of Flypast from alleviating the requirement for appropriate Hazard controls—that are lessons learnt from the 2019 C-130J near-CFIT which was approved as a Flypast (ie River Fire Brisbane is Display Flying (noting the manoeuvres) with scaled down Hazard controls).</p> <p>However, these Hazard controls are scalable. For example, the required Crew selection, rehearsal, etc is limited for events such as Riverfire.</p>
52	HQAC	AMC SPA.30(c)3iii. a.ix	<p>c. <b>Specifically</b>, for formation Display Flying: i. opposition manoeuvres involving vectors towards the crowd are prohibited except as <b>specifically</b> authorised by the <b>MAO MAO-AM or delegate</b> ii. formation Display Flying teams may not: (a) practise new manoeuvres or sequences without <b>MAO MAO-AM or delegate approval</b> (b) perform new manoeuvres or sequences in public without <b>MAO MAP-AM or delegate approval</b>.</p>	<p>Is the double use of the word specifically required? What is the point of these manoeuvres being prohibited if the AMC allows the MAO to approve them? Does this mean a MAO FLTATHO can approve these new manoeuvres? Should these approvals be limited to MAO-AM or delegate (eg as per GM SPA.30(a)3ii.c)? How is specific approval different to normal approval?</p>	<p>DASA amended AMC SPA.30(a)3i.a as follows:</p> <p><i>MAOs and UAS Operators should:</i> (a) <i>prohibit opposition manoeuvres involving vectors towards the crowd except as specifically approved by the MAO-AM</i> (b) <i>ensure that formation Display Flying teams do not:</i> 1. <i>practise new manoeuvres or sequences without MAO-AM approval</i> 2. <i>perform new manoeuvres or sequences in public without MAO-AM approval.</i></p> <p>These manoeuvres must be specifically authorised or approved by the MAO-AM. The approvals cannot be delegated, including to the FLTATHO.</p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
53	HQAC	N/A	a. Air Displays require four distinct approvals, as follows: i. the 'Authority to Conduct' IAW AC SI (OPS) 03-08 or single service equivalent considering reputation, finance and legal aspects ii. the Air Tasking Order (or single service equivalent) iii. the approval of the flight profile, airspace coordination measures, risk assessment and the required public affairs support to generate community awareness of the profile IAW AC SI (OPS) 03-08 or single service equivalent iv. FLTAUTH.	Is the approval requirement of the flight profile the responsibility of the MAO or determined by some other entity IAW single service instructions?	The MAO is responsible for ensuring the flight profile is approved, including airspace coordination measures, risk assessment and the required public affairs support to generate community awareness of the profile. However, the MAO does not need to specifically approve the flight profile (except as detailed at AMC SPA.30(a)3i.b)
54	HQAC	AMC SPA.30(b)2a.ii (c)	b.ii. Weather minima. MAOs and UAS Operators should publish weather minima for Air Displays that: (a) are appropriate to Crew experience, Aircraft performance (including formation manoeuvrability), type of Air Display, Display Sequence and Display Area (b) ensure Crew remain clear of cloud with a visibility sufficient to maintain both situational awareness and separation from Spectators, other Aircraft and terrain <b>(c) is appropriate for the flight rules and Class of airspace (eg VMC requirements).</b>	The weather minima should be expressed in absolute terms rather than simply VMC which is airspace dependant.	DASA incorporated the suggested change.
55	HQAC	AMC SPA.30(c)3iii. b	b.vi. MAOs and UAS Operators should publish minimum lateral safety distances between the Crowd Line and Display Line appropriate to Crew experience, Aircraft performance (including formation manoeuvrability), type of Air Display, and Display Sequence; and which <b>should not be less than:</b> (a) for crewed fixed-wing Aircraft in Flight, <b>200 m</b> —however the MAO should:	How does this requirement impact River Fire where aircraft manoeuvre within 200MSD of high rise buildings and the crowd (ie 200ft = 60m)? Are Flypasts exempt from the 200m crowd line rule?	Display Flying may be flown at 200 feet MSD, provided the area is surveyed and a Display Box has been established. Crew should adjust their profile for events such as River Fire, if obstacles are within 200 feet MSD.  Flypasts may be flown not below 200 feet HAOW 600 m outside a Display Box or over an unsurveyed location; or 200 feet MSD in a Display Box or at a location surveyed for low-level operations.
56	HQ AFTG	N/A	Add '(Defence Aviation context)'	Same term, different meaning to what is in the CASR Dictionary ( <a href="https://www.legislation.gov.au/F1998B00220/latest/text/5">https://www.legislation.gov.au/F1998B00220/latest/text/5</a> ):  <b>air display</b> means organised flying performed before a public gathering, including the following: (a) a contest; (b) an exhibition of aerobatic manoeuvres; (c) flying in formation; (d) other aircraft operations associated with the air display.  Needs to include Defence Aviation context to differentiate from at least the CASR other context.	A defined term which includes an asterisk indicates the term is DASP specific and has been derived or contextualised for Australian use by the Defence Aviation Safety Authority (DASA).

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
57	HQ AFTG	Glossary	Revise: A subset of an Air Display whereby the flying activity is designed to demonstrate <b>an Aircraft's</b> handling and operational capabilities, in the approved envelope, for the <b>Aircraft</b> Type, using a display sequence flown by specifically qualified display Flight Crew.  Final after revisions: A subset of an Air Display whereby the flying activity is designed to demonstrate handling and operational capabilities, in the approved envelope, for the Aircraft Type, using a display sequence flown by specifically qualified display Flight Crew.	Readability	DASA incorporated the suggested change.
58	HQ AFTG	N/A	Replace 'Air Displays' with 'Air Display'.	The NPA 2024-001 DASPMAN Glossary defined term is 'Air Display' vide the NPA 2024-001, Encl 1, Sect 1, and the singular is grammatically consistent with the stem sentence.	DASA did not incorporate the suggestion. Grammatial consistency within regulations is to refer to events as a plural (eg DASR FT - Flight Tests, DASR FSTD - Flight Simulator Training Devices).
59	HQ AFTG	SPA.05(a)	Add note '1 Air Display' regulated under SPA.30'	Cross-reference to SPA.30 via note as is provided for SPA.05(a)4 aeromedical evacuation.	DASA incorporated the suggested change.
60	HQ AFTG	SPA.05(a)	Revise note index in SPA.05(a)4 to '2'.	Consequential change to adding a note index '1' to SPA.05(a)1.	DASA incorporated the suggested change.
61	HQ AFTG	DASR SPA.30 (General)	Replace incorrect uses of forward slashes: a. in place of conjunctions with the correct conjunction: comma, semicolon, colon, and, or, but, en dash b. in optional plurals (also observed using s in parenthesis to create and optional plural) with either the singular form or the plural form: (1) optional plurals are often unneeded and are frequently numerically inconsistent with the sentence structure (2) a forward slash is only used for choice in a very limited number of circumstances, none of which apply in DASR SPA.30 c. using 'and/or' is specifically proscribed and must not be used in government documents, and 'and/or': (1) is lazy English, almost always not required (2) is often ambiguous as to whether the requirement is either (the or case) or both (the and case) (3) if ever the option of one or the other or both is necessary, the options are written: (a) A or B or both A and B (b) either or both A and B (c) only one of A or B (exclusive list) (d) A and B (inclusive list) (e) both A and B (specific list) (f) extrapolation of the foregoing for more than two subjects.	See Australian Government Style Manual <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/forward-slashes">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/forward-slashes</a> . The government style manual is the primary reference for authoring Defence documents vide <a href="http://intranet.defence.gov.au/home/documents/home/document-considerations/communication-format.htm">http://intranet.defence.gov.au/home/documents/home/document-considerations/communication-format.htm</a> . The <i>Australian Defence Force Writing Manual</i> is a secondary reference for <i>military specific writing requirements</i> : English convention is not military specific, and the Defence writing manual is replete with incorrect examples.	DASA reviewed and replaced: 1. all uses of forward slashes and optional plurals 2. 'and/or' with 'and' or 'or' (as appropriate).

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
62	HQ AFTG	DASR SPA.30 (General)	Latin abbreviations consistency DASA had settled on using the Australian Government Style Manual prescribed 'with full stops' in Latin abbreviations (e.g., i.e., etc.) format in the DASPMAN rather than the Australian Defence Force Writing Manual prescribed without full stops in Latin abbreviations (eg, ie, etc) format, demonstrated through revisions to the DASPMAN Vol 2 in NPAs in 2023 and 2024. Consistency requires DASR SPA to use the with full stops format for Latin abbreviations (as much as I disagree with the government style manual prescription). However, if DASA has changed direction and is using the no full stops format, then that too must be applied consistently throughout the DASPMAN. Either way, pick one and be consistent.	See <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/shortened-words-and-phrases/latin-shortened-forms">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/shortened-words-and-phrases/latin-shortened-forms</a>	DASA uses the Australian Defence Force Writing Manual (ADFWM) prescribed method without full stops in Latin abbreviations. DASPMAN is being cyclically reviewed which includes for consistency of writing method.
63	HQ AFTG	DASR SPA.30 (General)	Punctuation, em dash Most uses of an em dash in draft SPA.30 are incorrect or unnecessary uses. Whilst the Australian Defence Force Writing Manual provides guidance in the use of em dashes as parenthetical break, the uses for that purpose are unnecessary in the context for the text in SPA.30. Further, the DASPMAN is a Defence Manual and the Australian Government Style Manual is the primary reference for English expression in a Defence Manual. Other than those specifically cited in review, replace em dashes with commas.	See <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/dashes">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/dashes</a>	DASA incorporated the suggestion. DASR convention is to use the ADFWM and <i>DASR Interim Style Guide</i> vice the <i>Australian Government Style Manual</i> where convention allows.
64	HQ AFTG	DASR SPA.30 (General)	Parenthesis inside parenthesis needs to use different formats at each level, eg round, square, round - round, square, round (first words [more words (some more words) even more words] final words).	See <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation-and-capitalisation/brackets-and-parentheses">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation-and-capitalisation/brackets-and-parentheses</a>	Defence writing should avoid the use of brackets inside brackets (ADFWM Ch 4.66 refers). Therefore, DASA removed all instances of brackets inside brackets, by using different sentence constructions, commas, or a combination of em rules and brackets.
65	HQ AFTG	N/A	Replace 'Air Displays' with 'Air Display'.	The NPA 2024-001 DASPMAN Glossary defined term is 'Air Display' vide the NPA 2024-001, Encl 1, Sect 1, and the singular Air Display is grammatically consistent with the naming for the regulation	DASA did not incorporate the suggestion. Grammatial consistency within regulations is to refer to events as a plural (eg DASR FT - Flight Tests, DASR FSTD - Flight Simulator Training Devices).
66	HQ AFTG	N/A	Delete the invisible 'Handling Demonstration' text adjacent to the 'DASR SPA.30 – AIR DISPLAYS' header	There is an invisible 'Handling Demonstration' text under the comment box included in the mark-up of the in AFTG Objective BP43448077. Obviously not meant to be there and if the template used to create the PDF is the template to create the content for the DASPMAN in the DASA website, that invisible text may transfer.	DASA deleted the text.
67	HQ AFTG	GM SPA.30b	Add 'for an Air Display' to end the final sentence.	Precision to intent.	DASA incorporated the suggested change.



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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
68	HQ AFTG	N/A	Add the defined terms to the Australian Defence Glossary	<p>Noting that definitions specific to only one DASR are not in the DASPMan Glossary; defined terms in Defence OIP are meant to be in the Australian Defence Glossary vide <a href="http://adg.dpe.protected.mil.au/Home/About">http://adg.dpe.protected.mil.au/Home/About</a>:</p> <p><i>About the ADG</i> The Australian Defence Glossary (ADG) is the authorised source of Defence terminology (terms, definitions, and shortened forms of words). The ADG forms part of the Defence Terminology System (DTS), which supports and promotes accuracy and consistency in the meaning of words, for authors and readers of Defence documents.</p> <p><i>Authority</i> VCDF/Associate Secretary joint directive 1/2018 establishes the governance framework for the ADG and notes that the ADG is the single authoritative repository for all Defence-related terminology across whole of Defence.</p> <p><i>Terms in the ADG</i> The ADG lists Defence-related terminology sourced from authorised source publications within Defence including approved Australian Joint, Navy, Army and Air Force doctrine publications, NATO AAP-6 and AAP-15 publications, and the US DoD Dictionary. If a suitable or non-Defence term appears in the Macquarie Dictionary, the term is not entered into the ADG</p>	DASA added the defined terms to the Australian Defence Glossary.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
69	HQ AFTG	GM SPA.30d	<p>Requires change: The definition of the display box and what that means from a manoeuvring perspective is excessively limiting and allows no consideration of risk. For instance many Roulettes manoeuvres use approximately 1000 m around the crowd centre. The GM SPA.30, para c.vi definition would mean manoeuvres could not be conducted to the prescribed minima unless the entire area was clear of all secondary spectators and third parties. The current wording without an ability to provide a risk based approach would prevent any practice of PC-21 Low Level Aerobatics in the existing East Sale training areas due to houses within areas where aircraft are operated to the prescribed minima.</p> <p>The term sanitised needs changing.</p> <p>Additionally, many display areas and boxes aren't free of obstacles in the Defence context. The location of obstacles should be understood.</p> <p>An ADD often isn't involved in Defence displays, especially for AFTG and a specific display box often isn't defined but rather just a crowd line. Unless a significant change is expected to the conduct of all low level aerobatics, either the reference to ADD needs removing or the wording relaxed with reference to where aircraft can be operated to minimum height.</p>		<p>DASA amended the definition of 'Display Box' as follows:</p> <p><b>Display Box.</b> <i>The ground area footprint in the Display Area, thoroughly investigated pre-flight to identify and locate all hazardous obstructions. The Display Box should be, SFARP, clear of Spectators and Secondary Spectators, and hazardous obstructions.</i></p>

DASR SPA.30 Air Displays Comment Response Document

LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
70	HQ AFTG	GM SPA.30d	<p>Revise: <b>Display Line /and Display Axis.</b> A line defining the track along which the <del>Aircraft</del> <b>Display Crew</b> <del>conducting Display Flying</del> should operate relative to <b>when conducting Display Flying</b>.</p> <p>Final after revisions: <b>Display Line and Display Axis.</b> A line defining the track along which the Display Crew should operate relative to when conducting Display Flying.</p>	<p>1. Replace the forward slash with 'and' because one must not use a forward slash in place of a conjunction (comma, semicolon, colon, and, or, but, en dash), vide the <i>Australian Government Style Manual</i> <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/forward-slashes">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/punctuation/forward-slashes</a>. The government style manual is applicable vis: * <a href="https://www.stylemanual.gov.au/about-style-manual">https://www.stylemanual.gov.au/about-style-manual</a> <i>About the Style Manual</i> <i>Use the Style Manual when creating Australian Government content.</i> .... <i>The Australian Government Style Manual (Style Manual) is the definitive resource for Australian Government content.</i> * <a href="http://intranet.defence.gov.au/home/documents/home/document-considerations/document-formatting.htm">http://intranet.defence.gov.au/home/documents/home/document-considerations/document-formatting.htm</a>, vis: <i>Australian Government Style Manual</i> <i>Authors, editors and content developers should use the Australian Government Style Manual as the primary source of reference for writing styles and conventions.</i> <i>ADF Writing Manual</i> <i>The ADF Writing Manual is an authoritative source of guidance on military writing and on the conventions of writing and publishing that apply to ADF members specifically.</i></p> <p>2. Replace Aircraft with Display Crew because Display Crew conduct Display Flying, not Aircraft.</p> <p>3. Reword to prevent ending the sentence with the preposition 'to' for readability.</p>	DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
71	HQ AFTG	GM SPA.30d	<p>Revise: <del>Alternate</del> <b>Alternative</b> Display Sequence. <del>Modified A</del> display sequence flown in circumstances <del>where</del> <b>when</b> the weather (commonly referred to as a 'low show'), personnel or Aircraft serviceability (in the case of Display Teams) precludes flying the <del>Standard</del> intended Display Sequence.</p> <p>After revisions: Alternative Display Sequence. A display sequence flown in circumstances when the weather (commonly referred to as a 'low show'), personnel or Aircraft serviceability (in the case of Display Teams) precludes flying the intended Display Sequence.</p>	<p>Replace 'Alternate' with 'Alternative'. Alternative is the correct word for the meaning Alternate is a verb: -verb (i) 1. (sometimes followed by with) to follow one another in time or place reciprocally: day and night alternate; darkness alternates with light. 2. to change about by turns between points, states, actions, etc.: he alternates between hope and despair.</p> <p>Alternative is a noun, used as an adjective in this context: -adjective 4. affording a choice between two things, or a possibility of one thing out of two. 5. (of two things) mutually exclusive, so that if one is chosen the other must be rejected</p> <p>Modified is not the right term. The characteristics of the Alternative Display Sequence requires specific development and approval, as for all other kinds of display sequences, but the conditions preclude the intended display owing to tactical reasons (eg weather, aircraft serviceability, as mentioned in the description). This differs from the Special Venue Display in principle, that the Special Venue is determined by the geography and demography, whereas the alternative display is a contingency to execute on the day.</p> <p>The location (where) is the position at which the display is to occur. That is fixed. Time (when) is the dimension that creates the variable circumstances under which an Alternative Display Sequence is going to be needed.</p> <p>A Special Venue may also require an Alternative Display Sequence and therefore the Alternative Display Sequence is a prepared and approved display sequence for circumstances when the intended Display Sequence cannot be flown.</p>	DASA incorporated the suggested change.
72	HQ AFTG	GM SPA.30d	<p>Revise: Special Venue Display Sequence. <del>Modified A</del> display sequence flown in circumstances where the venue <del>for the Air Display precludes</del> <b>is not suitable</b> for flying a Standard Display Sequence. For example, an Air Display along a river can limit the Display Area laterally, requiring predominantly vertical manoeuvres along the Display Line.</p> <p>After revisions: Special Venue Display Sequence. A display sequence flown in circumstances where the venue for the Air Display is not suitable for flying a Standard Display Sequence. For example, an Air Display along a river can limit the Display Area laterally, requiring predominantly vertical manoeuvres along the Display Line.</p>	<p>Notwithstanding the revision provided, the Special Venue Display is a Roulettes term for one of the two standard display sequences that the Roulettes conduct, and each has an 'alternative display'. Suggesting that a Special Venue display sequence should exist for other pilots may not be applicable. Venues may require approval of a 'special venue display sequence' where the hazard associated with certain manoeuvres is not compatible with the venue geography and demography, or purely from the ability of spectators to view the standard display and not owing to any safety risk.</p> <p>Modified is not the right term. The Roulettes Special Venue Display is not a 'modified display', but a specially developed and approved display for locations at which the hazard associated with certain manoeuvres is not compatible with the venue geography and demography, which is more than tactical factors.</p>	DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
73	HQ AFTG	GM SPA.30d	Replace: <del>This definition may include third parties. This definition includes other persons affected by the Air Display even though those persons may not be viewing the Air Display.</del>	Rewording omits the undefined 'third parties' term. A person does not need to be actually watching the display to be a secondary spectator and, whilst there is reason for a distinction between Spectator and Secondary Spectator, the WHS Act 'other persons' is both Spectators and Secondary Spectators, vis: 1. s.3(1)(a) protecting workers and other persons against harm to their health, safety and welfare 2. s.19(2): protecting workers and other persons against harm to their health, safety and welfare 3. s.28(b): take reasonable care that his or her acts or omissions do not adversely affect the health and safety of other persons.	DASA incorporated the suggested change.
74	HQ AFTG	GM SPA.30(a)	Revise either: a. ensure <del>Air Display-related</del> the risks related to the Air Display are managed ... b. ensure Air <del>Display-related</del> Display – related risks are managed ...	Must use a spaced en dash to associate 'related' to the compound noun 'Air Display'. Whilst rearranging the sentence to <i>ensure the risks related to the Air Display are managed ...</i> is easier to understand, there are later instances of <i>Air Display – related</i> that support using option a.	DASA amended to use a spaced en dash (suggested change b).
75	HQ AFTG	GM SPA.30(a)c	Unnecessary use of an em dash and, given that the Australian Government Style Manual is the primary source for content in a Defence Manual, does not conform. A parenthetical phrase should be written in either:  a. ... (including Air Display – related generic Mission Risk Profiles [MRP]) ...  b. ..., including Air Display – related generic Mission Risk Profiles (MRP), ...  c. ... – including Air Display – related generic Mission Risk Profiles (MRP) – ...	Explanation: a. Parenthesis (note also the use of different parenthesis inside parenthesis in the rewording option) used for explanatory material that may be omitted (ie is additional not directly relevant content, just as is the text inside this parenthesis).  b. Parenthetical commas are used for content that is explanatory and is necessary to be retained (ie the content in the parenthetical commas could be removed and the sentence will still make sense, but will lose meaning).  c. spaced en dashes, used IAW the Australian Government Style Manual.  See vide <a href="https://www.stylemanual.gov.au/accessible-and-inclusive-content/how-people-read">https://www.stylemanual.gov.au/accessible-and-inclusive-content/how-people-read</a>	DASA incorporated suggested change b. DASR convention is to use the ADFWM and <i>DASR Interim Style Guide</i> vice the <i>Australian Government Style Manual</i> where convention allows.
76	HQ AFTG	GM SPA.30(a)a	<del>Display-related</del> Display – related		DASA incorporated the suggested change.
77	HQ AFTG	GM SPA.30(a)c.i	Revise: Standard <del>Display Sequence</del> or <del>Alternate Alternative</del> Display Sequence	Standard Display Sequence and Alternate Display Sequence are defined terms and there is no such thing as a Standard or Alternate Display Sequence. Defined terms must not be truncated for convenience.	DASA incorporated the suggested change.
78	HQ AFTG	GM SPA.30(a)iv	Replace: <del>Spectators, and Secondary Spectators-and third parties</del>	Secondary Spectators is already defined in GM SPA.30, para c.xii scoping other persons: <i>Secondary Spectator. A person viewing an Air Display from a location which has not been specifically designated for Spectators. This definition may include third parties.</i> However, note the recommended change to replace 'third parties' with other persons to align with the WHS Act.	DASA removed all instances of 'third parties' except from within the definition of 'Secondary Spectator'.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
79	HQ AFTG	GM SPA.30(a)iv	Revise: In turn, the complexity of the Display Sequence is proportional to <del>its</del> the energy level, and the number and difficulty, of the manoeuvres in the sequence, <del>as well as the manoeuvres' difficulty.</del>  After revisions: In turn, the complexity of the Display Sequence is proportional to the energy level, and the number and difficulty, of the manoeuvres in the sequence	The pronoun 'its' is often ambiguous and should be avoided when the definite topic can be identified. Rewording has the same meaning but easier to read and follow.	DASA incorporated the suggested change.
80	HQ AFTG	GM SPA.30(a)iv	Replace 'its' with 'the true'	Avoids unnecessary use of 'its' and the precision that the true airspeed is the speed of interest when determining energy.	DASA incorporated the suggested change.
81	HQ AFTG	GM SPA.30(a)iv	Revise as for comment in GM SPA.30(a)1, para c.ii, Secondary Spectators.		LSN 78 refers.
82	HQ AFTG	GM SPA.30(a)ii	Replace 'their' with 'the'	Their relates to people and the subjects are not people. 'The' in place of 'their' is grammatically correct and does not change the guidance.	DASA incorporated the suggested change.
83	HQ AFTG	DASR SPA.30 (General)	All uses of 'Crew' in DASR SPA.30 are logically meant to the Display Crew (defined in GM SPA.30, para 1.c.vii) and Flypast (defined in GM SPA.30, para 1.c.vii) Crew (DASPMAN Glossary), because any other Crew would not be relevant to the task.		DASA reviewed all instances of the term 'Crew' and replaced with 'Display Crew' where applicable. Note: Display Crew is only relevant in the context of Display Flying.
84	HQ AFTG	GM SPA.30(a)ii	Replace 'Display Sequence/s' with 'Display Sequence'.	Incorrect use of a forward slash, optional plurals are often not required and often grammatically incorrect in the associated sentence, and the context is singular not plural.	DASA incorporated the suggested change.
85	HQ AFTG	GM SPA.30(a)ii	revise: (eg Standard Display Sequence or Special Venue Display Sequence)	Standard Display Sequence and Special Venue Display Sequence are defined terms and there is no such thing as a Standard or Special Venue Display Sequence. Defined terms must not be truncated for convenience.	DASA incorporated the suggested change.
86	HQ AFTG	GM SPA.30(a)ii(c)1	Replace 'or' with 'and'.	Both aerodromes and areas with special significance must be considered.	DASA incorporated the suggested change.
87	HQ AFTG	GM SPA.30(a)ii(d)	Delete 'premeditated'.	The requirements for ejection are both emergency and premeditated and, in the case of a display or flypast, more likely to be emergency ejection and not premeditated.	DASA incorporated the suggested change.
88	HQ AFTG	GM SPA.30(a)ii(e)	Replace: Spectators, and Secondary Spectators <del>and third parties</del>	Secondary Spectators is already defined in GM SPA.30, para c.xii scoping other persons: <i>Secondary Spectator. A person viewing an Air Display from a location which has not been specifically designated for Spectators. This definition may include third parties.</i> However, note the recommended change to replace 'third parties' with other persons to align with the WHS Act.	LSN 78 refers.
89	HQ AFTG	GM SPA.30(a)ii(e)	Replace 'personnel' with 'people' or 'persons'.	Personnel has a specific meaning in the Defence context and the usage here is not that context. Either people or persons can be directly substituted and is consistent with the remainder of the meaning.	DASA replaced 'personnel' with 'people'.
90	HQ AFTG	GM SPA.30(a)ii(g)	Replace 'or' with 'and' in '... how Display Flying or and Flypasts are integrated'.	The inclusive 'and' is the correct context for the sentence.	DASA incorporated the suggested change.
91	HQ AFTG	GM SPA.30(c)3ii.b	Replace 'their' with 'the'.	Their relates to people and aircraft are not people.	DASA incorporated the suggested change.

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92	HQ AFTG	GM SPA.30(c)3ii.b	Revise: For example, a <del>four-G</del> four-G turn looks from the ground just as tight as a six-G turn <del>from the ground, ...</del>  After revisions: For example, a four-G turn looks from the ground just as tight as a six-G turn	Incorrect use of an en dash.  Rearranged because the perspective 'from the ground' is directly related to 'looks'. Placing the perspective 'from the ground' after 6 G turn relates that perspective only the 6 G turn. Placing a comma after 6 G turn, as in:  <i>a four-G turn looks just as tight as a six-G turn, from the ground</i>  or placing from the ground in parenthesis, vis:  <i>a four-G turn looks just as tight as a six-G turn (from the ground)</i>  would also apply the term 'from the ground', to both turns but associating 'looks' and 'from the ground' by proximity is preferable and easier to read.	LSN 37 refers
93	HQ AFTG	GM SPA.30(c)3ii.b	Revise: However, reducing the G <del>also</del> reduces risk by providing a safety margin if the turn needs to be tightened, and increased margins from the physiological effects of acceleration and turbulence on aircraft limitations.	There is no precursor risk factor that makes the margin to tighten the turn an 'also' risk reduction consideration, and reducing G has a direct effect on physiological and aircraft overstress risk-reduction that are relevant to the discussion.	DASA incorporated the suggested change.
94	HQ AFTG	GM SPA.30(a)iii	Revise: (b) potential emergencies, including: 1. emergencies resulting from mishandled manoeuvres 2. <del>helicopter</del> rotary-wing Aircraft: A. loss-of-power while operating in the avoid area of the height-velocityheight-velocity diagram B. loss of tail-rotor effectiveness C. vortex ring state <del>3. for rotary-wing Aircraft, vortex ring state</del>  After revisions: (b) potential emergencies, including: 1. emergencies resulting from mishandled manoeuvres 2. rotary wing Aircraft: A. loss-of-power while operating in the avoid area of the height-velocity diagram B. loss of tail-rotor effectiveness C. vortex ring state	See inquiry for GM SPA.30(a)1, para c.v(d) about rotor disc vortex. An en dash not hyphen is needed in 'height-velocity diagram'. Paras (b)(2) and (b)(3) both relate to rotary wing aircraft (eg helicopters; tilt-rotors); and both relate to helicopters. 'Rotary wing' is the all encompassing term for helicopters and tilt-rotor aircraft. All examples of fixed wing and rotary wing in the DASPMAN Glossary are without a hyphen, not fixed-wing and rotary-wing with a hyphen. Either need to use 'rotary wing' or fix the DASPMAN Glossary (the Glossary should be fixed).	DASA incorporated the suggested change.
95	HQ AFTG	GM SPA.30(a)iii(c)	Delete the comma following 'collision'.	An Oxford Comma can be used for clarity in a list of disparate subjects. The list of catastrophic failure, collision and CFIT all relate back to 'potential debris scatter patterns resulting from' making the list a coherent list and therefore does not need an Oxford Comma.	DASA incorporated the suggested change.

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96	HQ AFTG	GM SPA.30(a)iii(c)	What is the failure path that DASA requires the MAO to consider as the cause for a catastrophic failure that leads to the need to consider the ensuing debris scatter pattern?	Aircraft are certified for flight within operating limitations so that aircraft will remain intact and complete during all phases of flight, including a flypast or flying display. A flying display is naturally designed to remain within the certified operating limitations, and with turbulence and manoeuvre margins. I am at a loss to identify in what way then catastrophic failure is a necessary consideration for any phase of flight let alone a flypast or flying display.	The MAO should consider debris scatter patterns following a catastrophic in-Flight failure, a mid-air collision or CFIT. Defence operate WHRA under NDR.05 (AMC NDR.05.B paras28-34 refer). Noting CASA does not require limited category ex-military aircraft to comply with any specific civil airworthiness standards or design codes, the potential for a catastrophic failure of the airframe structure in Flight cannot be discounted for WHRA. Other Defence Aircraft, manoeuvring within operating limitations, should remain intact during all phases of Flight.  DASA amended GM SPA.30(a)1c.v(c) as follows:  <i>potential debris scatter patterns following collision, CFIT or for Aircraft where compliant airworthiness codes or specifications may not exist (eg WHRA), catastrophic failure</i>
97	HQ AFTG	GM SPA.30(a)iii(b)	What is the intended meaning of 'rotor disc vortex'?	Rotor disc vortex is a factor in: a. loss of tail rotor effectiveness (LTE), added in GM SPA.30(a)1, para c.v(c) because LTE can be resultant from an emergency (drive failure) or LTE caused by handling errors in the same way a vortex ring results from handling errors b. recirculation of rotor downwash when in ground effect, which is exacerbated by adjacent obstacles c. wake-turbulence, which can be more hazardous to the wake-turbulence from a fixed wing aircraft for the same mass. Whilst it has been a long time since the reviewer flew helicopters, and is relying on PAARM Chap 12 to reinforce recall, rotor disc vortex does trigger a recall and does not appear to be a 'condition' rather a cause for other conditions.	DASA notes the question and agrees with the explanation that rotor disc vortex is a causal factor of other conditions. Therefore, DASA removed 'rotor disc vortex' from GM SPA.30(a)1c.v(d).
98	HQ AFTG	GM SPA.30(a)iii(d)	Revise: (d) rotor disc vortex, rotor downwash, <del>or prop/jet- and propeller- and jet-blast.</del>  After revisions: (d) rotor disc vortex, rotor downwash, and propeller- and jet-blast.	Rotor disc vortex relates, inter alia, to the recirculation of rotor downwash collecting FOD and inducting that in to the rotor. Is that the context intended in this context where the other listed factors are related to aircraft-related hazards on the ground. Note that rotor disc vortex also relates to wake turbulence, that also needs to be considered.	DASA incorporated the suggested change.
99	HQ AFTG	GM SPA.30(a)iii(e)	Add (e) wake turbulence.	Not mentioned and needs to be considered.	DASA incorporated the suggested change.
100	HQ AFTG	GM SPA.30(c)3iii. h	Replace: Rotor downwash, propeller-blast and jet-blast risk areas vary with ambient wind, and funnelling and channelling features (eg buildings, concrete barriers). Wind and features can direct or accelerate the effect, and can cause loose debris, and light and unsecured structures (eg display signs) to become airborne. DSTG modelling of rotor downwash from a hovering helicopter (AB26272152 refers) demonstrates that the outflow velocity decays with radial distance from the Aircraft. The rate of outflow velocity decay was mostly independent of the hover altitude. However, the outflow velocity decay is shown to vary with wind speed. The rotor downwash DSTG modelling allows definition of downwash risk areas and lateral separation distances.	Redrafted for: a. remedying incorrect usages of a forward slash b. rotor downwash, propeller-blast and jet-blast are not one 'risk area' but are three 'risk areas' c. Latin abbreviation eg retaine; however, edit if required to be consistent with prior DASA practise d. removing use of 'magnitude' with 'decay' referring to 'velocity' that is not needed because decay can only relate to the scalar 'speed' (magnitude) element of velocity e. clarity that the outflow velocity is what is being considered because the vertical velocity is not the hazard under consideration nor affected by wind, and is the cause for needing 'lateral separation distances' f. either all of the narrative is in the present tense 'demonstrates', 'is'; or past tense 'demonstrated', 'was'.	DASA incorporated the suggested change.



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101	HQ AFTG	GM SPA.30(a)c.i.v i	Replace 'Display Flying-specific' with 'Display Flying – specific'.	Spaced en dash to link 'specific' with the compound noun 'Display Flying'.	DASA incorporated the suggested change.
102	HQ AFTG	GM SPA.30(a)c.i.v ii	Replace 'unregulated' with 'unnotified and illegal'.  Replace 'drone' with 'UAS'.  Replace 'ANZAC' with 'Anzac'.	Recreational UAS are subject to regulations and therefore regulated. That UAS operators can operate without notifying that operation in areas where notification or approval is not required and users not conforming to the regulations makes the operations 'unnotified and illegal' not 'unregulated'.  DASPMAN does not refer to UAS as 'drone' and drone is therefore not a recognised term. Moreover, 'UAS-related threats' is the paragraph title. If drone must be retained, place drone in parenthesis after UAS. That is, ... recreational UAS (drone).  Anzac vide <a href="https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/numbers-and-measurements/dates-and-time">https://www.stylemanual.gov.au/grammar-punctuation-and-conventions/numbers-and-measurements/dates-and-time</a>	DASA incorporated the suggested change.
103	HQ AFTG	GM SPA.30(a)c.i.v ii	Revise: However, UAS operations near an Air Display can distract the Crew from the operation of operating the Aircraft, and represent present a Hazard to the display Aircraft.  After revisions: However, UAS operations near an Air Display can distract the Crew from operating the Aircraft, and present a Hazard to the Aircraft.	Crew is singular in this context requiring 'the'. Operating is simpler and means the same as 'the operation of'. Comma needed after 'operating the Aircraft' because there are two separate main clauses: 'operating the aircraft', and 'hazard to the Aircraft'. Represent is the wrong verb: represent means to stand in, proxy; whereas the context is that a UAS is a hazard, and 'present' is the verb to use in that context. Display is not needed in describing the aircraft because that is implicit, and the term is 'Air Display' not 'display'. Hazard has been left capitalised presuming that DASR SMS will retain (albeit that DASR SMS should not) retain hazard as a defined term.	DASA incorporated the suggested change.
104	HQ AFTG	GM SPA.30(a)c.i.v ii	Revise: Therefore, MAOs and UAS Operators should consider <del>assessing and mitigating</del> Safety Risk Management for the risks of UAS operating in the vicinity of Air Displays.  After revisions: Therefore, MAOs and UAS Operators should consider Safety Risk Management for the risks of UAS operating in the vicinity of Air Displays.	Safety Risk Management is what is required, and that includes assessment and application all reasonably practicable risk controls (mitigation), among other things. We need to use the terms that are required IAW DASR.	DASA incorporated the suggested change.

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105	HQ AFTG	GM SPA.30(a)d	Revise: <b>Civilian locations. At civilian locations, the ADEO/ADD of The ADEO, ADD and Display Crew should not assume that the same level of controls (eg site preparation, or FOD awareness) to that of as military controlled environments will be in place. MAOs and UAS Operators should inform conduct their SRM accordingly.</b>  After revisions: <b>Civilian locations.</b> The ADEO, ADD and Display Crew should not assume that the same level of controls (eg site preparation, FOD awareness) as military controlled environments will be in place. MAOs and UAS Operators should conduct their SRM accordingly.	The paragraph heading already defines the scope of the paragraph and repeating 'civilian locations' is not needed in the subsequent sentence. See <i>Australian Defence Force Writing Manual</i> para 6.67.  Correcting incorrect use of a forward slash. All of the ADEO, ADD and Display Crew need to consider the associated factors. Whether or not an ADEO or ADD is applicable is not material to what is needed and who needs to do what is needed.  An example list is by nature non-exhaustive. A conjunction is not needed, nor should a conjunction be used, in an example list.  Inform is the wrong verb for the needed SRM outcome. Conduct of SRM is the needed activity.	DASA incorporated the suggested change.
106	HQ AFTG	AMC SPA.30(c)1ii.a .ii(a)	Revise: includes both knowledge and skills-based training and assessment  After revisions: includes both knowledge and skills training and assessment	The word 'based' is simply not needed.	DASA incorporated the suggested change.
107	HQ AFTG	AMC SPA.30(c)1ii.a .ii(b)	Revise: is conducted by <b>a QFI, OFI or Fighter-Combat Instructor (FCI) Aircrew Instructors and assessors</b> that the MAO or UAS Operator has <b>approved authorised</b> to implement <b>a-Display Flying course training and assessment</b>  After revisions is conducted by Aircrew Instructors and assessors that the MAO or UAS Operator has approved to implement Display Flying training and assessment	Not only pilots require skilling to do Display Flying and prescribing only QFI, OFI and FCI is both overly prescriptive insufficiently scoped. The MAO is responsible for setting which kinds of Aircrew Instructor to use and that instructor naturally can only instruct within the approved scope. Further, a competency assessment requires an assessor, not only an instructor. Whilst 'authorisation' is a correct public policy term, 'delegation' being the other term used in public policy for a proxy to act on behalf of an authority, 'authorisation' has a specific meaning in aviation safety that must be avoided if practicable. Approved has an appropriate plain language meaning that can be used in this context.	LSN 10 refers
108	HQ AFTG	AMC SPA.30(c)1ii.a .ii(c)2	The term 'escape manoeuvre' requires a definition or revise: is proficient in <b>escape manoeuvres identifying conditions to cease a display manoeuvre and performing the subsequent manoeuvres to maintain safe flight thereafter</b>		DASA incorporated the suggested change.
109	HQ AFTG	AMC SPA.30(c)1ii.a .iii(b)	Revise: for ADD, includes the requirement that <b>they ADD complete the approved training Display Flying Supervisor Accreditation Course delivered by:</b> <b>(a) AFHQ Air Shows Team (AST)</b> <b>(b) a qualified and current ADD, in consultation with Head of Airshows (HAS) AFHQ.</b>  After revisions: for ADD, includes the requirement that ADD complete the approved training	DASR are meant to be outcomes based. Who is accredited to deliver training and to what the course of training is named and to whom is approved to deliver the training should not be in DASR because, as the skill is not a DASA licence, DASA does not have a role in approving how to achieve the outcome. Pronouns should not be used when the noun is readily usable.	DASA partially incorporated the suggested changes, replacing 'they' with 'ADD'. However, DASA did not incorporate the remainder of the changes. It is appropriate to include a course of training and who is accredited to deliver the training as AMC.  Additionally, AFHQ AST have requested this specific inclusion to alleviate MAO concern regarding who is delivering the training.

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110	HQ AFTG	AMC SPA.30(c)1ii.b	Revise: Currency- <a href="#">for Display Crew</a> :	Currency is both a paragraph title and stem sentence for the subsequent list, requiring a colon. The subsequent para e.i using the title 'for Display Crew' is not needed, because all of para e is for Display Crew', hence those words are part of the stem sentence, title in para e.	DASA incorporated the suggested change.
111	HQ AFTG	AMC SPA.30(c)1ii.b .i	Revise: <del>For Display Crew- MAOMAOs</del> and UAS Operators should define Currency requiring Display Crew to perform the Display Sequence in the preceding 30 days at the relevant approved minima.  After revisions: MAOs and UAS Operators should define Currency requiring Display Crew to perform the Display Sequence in the preceding 30 days at the relevant approved minima.	The phrase 'For Display Crews' is to be incorporated in to the stem sentence.  Plural MAOs required to match with plural UAS Operators for numerical consistency.	DASA incorporated the suggested change.
112	HQ AFTG	AMC SPA.30(c)1ii.b .i	Plural MAOs required to match with plural UAS Operators	Numerical consistency	DASA incorporated the suggested change.
113	HQ AFTG	AMC SPA.30(c)1ii.b .i	Requires simplification to requiring MAOs document currency requirements and limitations to the display sequence for regaining currency.	The details in this paragraph are very specific and not applicable in all circumstances for all operators. Para ii(a) is largely in line with AFTG requirements but the use of 'display sequence' is limiting. Should be similar to display sequence or relevant manoeuvres. An example here is that Roulettes may only fly a High Show at a higher height to regain currency as it contains the more dynamic higher risk manoeuvres and, owing to that, provides currency for the Special Venue Display. Additionally, the Roulettes may only fly the more appropriate ending portion a the display sequence for currency, and requiring the entire display to be flown for only that sequence would be excessive.	LSN 4 refers.
114	HQ AFTG	AMC SPA.30(c)1ii.b .i	Replace 1 000 ft with 1000 ft.	Numerical values up to 9999 are written with no space unless a space is required for consistency with larger numbers (eg a table of mixed small numbers and large numbers). See <i>Australian Defence Force Writing Manual</i> paras 5.11 to 5.13. Whilst the <i>Australian Government Style Manual</i> declares to use a comma (eg 1,000) that prescription does not comply with the <i>National Measurement Act 1960</i> .	DASA incorporated the change. Although the extant format conforms to ADFWM Ch 5.11 convention, with large numbers separated into groups of three digits with a non-breaking space, the ADFWM Ch 5.12 states:  <b>Four-digit numerals.</b> Numbers consisting of up to four digits are expressed without spaces since they are sufficiently short to be readily comprehensible. This convention is in accordance with the Style Manual and is endorsed by the Standards Association of Australia.
115	HQ AFTG	AMC SPA.30(c)1ii.b .i	The words 'MAOs and UAS Operators should promulgate' policy belongs in the beginning of the AMC.	MAOs and UAS Operators are required to promulgate policy for all of the foregoing AMC and subsequent AMC too.	LSN 112 refers.
116	HQ AFTG	AMC SPA.30(c)1ii.b .i	Replace: MAOs and UAS Operators should promulgate requirements for a Display Crew to regain qualification following an extended lapse in Currency,	The operator is responsible to define what timeframe that leads to a lapse in qualification and how to regain a qualification, not DASA.	DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
117	HQ AFTG	AMC SPA.30(c)1ii.b .j	<p>Revise: <b>Currency requirements for For ADD. MAO</b> MAOs and UAS Operators should define: (a) Currency <del>requiring</del> requirements for ADD <del>to act as an ADD at an Air Display at least once every two years.</del> (b) <del>MAO and UAS Operators should define</del> requirements for ADD to regain Currency (MAOs and UAS Operators may refer to AFHQ AST OIP when defining ADD Currency). <del>MAOs and UAS Operators may refer to AFHQ AST OIP when defining ADD Currency.</del></p> <p>After revisions: <b>Currency requirements for ADD.</b> MAOs and UAS Operators should define: (a) Currency requirements for ADD (b) requirements for ADD to regain Currency (MAOs and UAS Operators may refer to AFHQ AST OIP when defining ADD Currency).</p>	<p>Paras e.iv and v are about ADD currency requiring these paras to be merged. Paragraph title is absent the purpose requiring adding 'currency requirements'. Plural MOAs needed for numerical consistency with UAS Operators. As the ADD is not a DASA licence, it is not DASA's place to prescribe what are the currency requirements.</p>	<p>DASA partially incorporated the suggested change, amending AMC SPA.30(a)2 e.iv and v as follows:</p> <p><b>Currency requirements for ADD. MAOs and UAS Operators should define:</b> (a) <i>Currency requirements fthat require ADD to act in the role as an ADD at an Air Display at least once every two years.</i> (b) <i>requirements for ADD to regain Currency.</i> <sup>1</sup> MAOs and UAS Operators should refer to AFHQ AST OIP when defining ADD Currency.</p> <p>Rationale: The two-year Currency requirement is consistent with best practice as applied by DASA-recognised CAAs and MAAs.</p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
118	HQ AFTG	AMC SPA.30(c)1ii.d	ADD training and competency may not be appropriate to record IAW DASR Aircrew.10(a)6.a	<p>DASR Aircrew.10(a)6 is:</p> <p>6. Method of recording competency and currency, which must: AMC</p> <p>AMC AIRCREW.10.A(6) - Method of recording qualification, competency and currency</p> <p>1. The authority to award aircrew qualifications should be listed in the approved Command OIP.</p> <p>2. All aircrew qualification awards should be recorded in accordance with DASR AIRCREW.80.</p> <p>3. The recording method may be flying logbooks, electronic (soft copy) based solutions, or any other format that is determined to be enduring.</p> <p>4. The competency management system should not be contained within operational documents.</p> <p>5. The records of competency and recency are deemed OIP. As such, the provisions of DASR.AO.GEN apply.</p> <p>a) list in the approved OIP the authority(ies)</p> <p>b) utilise a recording method in a format determined to be enduring.</p> <p>AMC AIRCREW.10(a)6, para 1. Command OIP is not appropriate. MAO OIP</p> <p>AMC AIRCREW.10(a)6, para 5. Records of training <i>are not OIP</i> by any definition of OIP and personal privacy records cannot be managed as OIP. Records of competency and recency are personal privacy official records and must be managed IAW official records and privacy requirements.</p> <p>DASR Aircrew.10(a)6.a. Not only must an optional plural not be used, the form 'authority(ies)' is definitely not correct. Furthermore, DASR Aircrew.10(a)6.a does not make sense in either the singular or plural form:</p> <p>6. Method of recording competency and currency, which must list in the approved OIP the authority [to do what?]</p> <p>6. Method of recording competency and currency, which must list in the approved OIP the authorities [to do what?]</p> <p>The DASR Aircrew.10(a)6.a policy statement needs read 'list the authorities to award a competency and verify currency in approved OIP'.</p>	<p>DASA removed the word 'training'. Additionally, DASA amended AMC SPA.30(a)2c.iii as follows:</p> <p>iii. For ADD, includes the requirement that the ADD are Crew and have completed the Display Flying Supervisor Accreditation Course delivered by:</p> <p>ADD qualification is deemed an aircrew qualification. Therefore, ADD qualification can be recorded IAW DASR AIRCREW.10(a)6.</p>
119	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
120	HQ AFTG	GM SPA.30(c)1i.a	<p>Revise:</p> <p>Therefore, Display Crew should be aware of, and understand, the <del>responsibility</del>responsibilities of this role.</p> <p>After revisions:</p> <p>Therefore, Display Crew should be aware of, and understand, the responsibilities of this role.</p>		DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
121	HQ AFTG	GM SPA.30(c)1i.a	Replace paras a.i and ii with the following, and renumber para a.ii to a.ii consequently: i. Minimum category requirements for the Aircraft Captain, and Co-pilot and other Crew in a multi-crew aircraft, appropriate to the complexity and difficulty of the Air Display.	Category B is specifically identified for certain ACs owing to, for example, focus on capability outcomes for the organisation (eg pilot training) before expanding professional development in to non-core roles (eg Display Flying). That does not mean a Category C pilot is inadequately skilled to perform a handling display. Whilst GM, GM has a way of becoming exemplar and requiring justification to DASA in auditing. Similarly for other pilots and crew, Category D does not mean those crew are inadequately skilled to crew an aircraft for a display.	DASA did not incorporate the suggested change.  Rationale: The 2019 C-130J Near-CFIT ASR found that 'best practice, as evidenced by other Air Force units, is to have specific selection criteria for display crews'. The ASR further states:  <i>ASIT reviewed OIP as per para 39. In all cases, WG or SQN OIP outlined specific selection criteria, training and currency requirements for all display crews. For example, common selection criteria included:</i> <i>a. A or B category</i> <i>b. Low Level Aerobatic endorsement</i> <i>c. Highly suitable for Representational Duties</i> <i>d. Minimum hours</i> <i>e. Assessed as suitable by unit CO.</i>  DASA retained the proposed GM as it guidance to MAOs and UAS Operators on the appropriate determinants of skill and experience for Display Crew. The use of the term 'may', consistent with GM AO GEN.00, is permissive, not prescriptive.
122	HQ AFTG	GM SPA.30(c)1i.c	Revise: <b>FLTAUTHO selection.</b> Flight Authorisation Officer/Officers (FLTAUTHO) holding a Display Flying qualification may support improved Hazard identification through a better appreciation of factors affecting Air Displays, including:	FLTAUTHO is the singular Flight Authorisation Officer, and the singular form is grammatically correct. Hazard remains capitalised only if DASR SMS NPA retains hazard as a defined term (which should not be defined in DASPMAN).	DASA incorporated the suggested change.
123	HQ AFTG	GM SPA.30(c)1i.c. i	The term 'knock it off' requires a definition or revision: criteria to cease an Air Display manoeuvre ('knock it off') and to cease or not commence an Air Display entirely ('terminate')	Policy must use plain language terms or defined terms. There is no plain language meaning for 'knock it off'.	DASA incorporated the revision as written.
124	HQ AFTG	GM SPA.30(c)1i.c. iii	Revise: environmental aspects (e.g. elevation and the use of QFE for Display Flying (and for Display Flying-QFE), contrast conditions, weather, and visibility)  After revisions: environmental aspects (e.g. elevation and the use of QFE for Display Flying, contrast conditions, weather, visibility)	Latin abbreviation with full stops used for consistency with previously experienced DASA precedent. Must use a different parenthesis for parenthesis inside parenthesis. However, that issue is resolved by listing QFI for display flying as a further example. As previously mentioned, a conjunction is not needed and should not be used in an example list, because an example list is non-exhaustive.	DASA partially incorporated the suggestion rewording GM SPA.30(a)2d.iii as follows:  <i>iii. environmental aspects (eg elevation and the use of QFE for Display Flying, contrast conditions, weather, visibility)</i>  IAW ADFWM Ch 3.115 the latin abbreviation for <i>exempli gratia</i> is 'eg' without full stops.
125	HQ AFTG	GM SPA.30(c)1i.c. iv	Revise: <del>location</del> location and display specific emergency procedures	Must not use a forward slash in place of a conjunction.	DASA incorporated the suggested change.
126	HQ AFTG	GM SPA.30(c)1i.c. vi	Revise: limitations of the Flight Authorisation and approval (via AE679 – RAAF Flight Profile Approval Proforma (FPAP) or IAW single-Service procedures service equivalent)	Mention of the FPAP is Air Force specific and citing the Air Force specific requirements in a Defence Manual is not appropriate. Service in the context of the Navy, Army and Air Force organisations is a proper noun.	DASA incorporated the suggested change.
127	HQ AFTG	GM SPA.30(c)1i.c. vii	Revise: Display Crew composition, qualifications and Currency	The crew is the display crew.	LSN 83 refers.
128	HQ AFTG	N/A	What is required for a flypast?		LSN 215 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
129	HQ AFTG	GM SPA.30(c)1i.d	DFS should be an executive Aircrew within the MAO's or UAS Operator's organisation <del>a squadron or regiment executive.</del>		DASA incorporated the suggested change.
130	HQ AFTG	GM SPA.30(c)1i.d. iii	Revise: MAOs and UAsUAS Operators should consider <del>DFS</del> Aircrew who are FLTAUTHOs, and exhibit the following personal traits, for appointment as DFS:	Spelling; precision.	DASA incorporated the suggested change.
131	HQ AFTG	GM SPA.30(c)1ii.b .iv	Revise: Non-Technical Skills (NTS) <del>as it relates</del> relating to Display Flying	Simpler; direct.	DASA incorporated the suggested change.
132	HQ AFTG	GM SPA.30(c)1ii.b .vi	Revise: each manoeuvre in the Standard Display Sequence, <del>Alternate, and (where applicable) Special Venue Display Sequence and Alternative Display Sequence (and Special Venue Display Sequence if applicable),</del> including:  After revisions: each manoeuvre in the Standard Display Sequence and Alternative Display Sequence (and Special Venue Display Sequence if applicable), including:	Standard Display Sequence, Alternative Display Sequence are defined terms and are meaningless if truncated. Special Venue Display Sequence may not be applicable at all.	DASA incorporated the suggested change.
133	HQ AFTG	GM SPA.30(b)1b	Revise: MAOs and UAS Operators should consider establishing training <del>er</del> and Competency requirements for Crew conducting Flypasts, particularly if the Flypast forms part of a complex Air Display. The Competency requirements may be the <del>same, or a subset of</del> same as or a subset of, the training provided to Display Crew.	Both training and competency is required. As is needed for a grammatically correct sentence structure, and the comma after same to deleted and a comma inserted after 'subset of', in order to link 'the training provided to Display Crew' to the 'same as' and 'subset of' clauses.	DASA incorporated the suggested change.  LSN 40 refers.
134	HQ AFTG	GM SPA.30(c)1ii.j	Revise: <del>Where Currency has lapsed,</del> MAOs and UAS Operators should consider tailored ADD <del>fe-</del> Currency training that includes a review of planning, organisation and management considerations for Air Displays, as well as supervision and/or assessment by <del>another</del> current ADD at an Air Display.  After revision MAOs and UAS Operators should consider tailored ADD Currency training that includes a review of planning, organisation and management considerations for Air Displays, as well as supervision and assessment by a current ADD at an Air Display.	Removing unneeded words and the proscribed 'and/or' conjunctions.	DASA partially incorporated the suggestion rewording GM SPA.30(a)2n as follows:  <i>Where Currency has lapsed, MAOs and UAS Operators should consider tailored ADD Currency training that includes a review of planning, organisation and management considerations for Air Displays, as well as supervision and assessment by a current ADD at an Air Display.</i>  Amendment retains commonality with GM SPA.30(a)2k.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
135	HQ AFTG	GM SPA.30(c)2b.i v	<p>Restructure para p.iv in to incomplete sentences, and include the 2009 near-CFIT example as an expandable in-text note, vis:</p> <p>the Display Crew's primacy in making any cancellation decisions (vice ADEO, ADD and DFS), that is:</p> <p>(a) if the Display Crew identify any trigger (eg poor weather or breakdown in deconfliction) and cancels participation in a display, then no other appointment should attempt to override the Display Crew's cancellation decision</p> <p>(b) any responsible appointment related to the Flying Display (eg FLTAUTHO or ADD) may make a cancellation decision, and the FLTAUTHO or ADD should convey any cancellation report via two-way communication, such as telephone (before dispatch) or radio when the flight is in progress (ie cancellation should not be communicated via an informal messaging application)<sup>1</sup></p> <p><i>1. A 2019 near-CFIT incident during an Air Display in Sydney Harbour highlighted some of the Hazards associated with using an informal messaging application:</i></p> <p><i>The message thread was used by a number of participants who provided weather updates, opinions on the ability of the crew to conduct the display, and advice on how to achieve the display. Notably, the authorising officer was one of those participants. In addition, there were increasing communications about the need to make a decision on whether the Aircraft would be able to conduct the display, given the weather...</i></p> <p><i>...The informal nature of the communications introduced misunderstandings (e.g. the differing understanding of the AC and the authorising officer with respect to the special VFR approval), and ambiguity. It is possible that the directive tone of some of the authorising officer's messages influenced the crew to subconsciously defer the decision about the display to the authorising officer.</i></p>	<p>A list must be either all incomplete sentences or all complete sentences at the same level. GM SPA.30(a)2, para p is a Level 1 paragraph among preceding Level 1 paragraphs which are complete sentence at Level 1, some include Level 2 paras that are incomplete sentences aggregating a complete sentence at Level 1. Para p.iv is a Level 2 paragraph amongst other Level 2 paragraphs of incomplete sentences in paras p.i to p.iii. Para p.iv must therefore also comprise an incomplete sentence. Restructuring para p.iv in to further subparagraphing removes the temptation to close the first sentence for sentence length.</p> <p>Note though, the use of the Latin abbreviation for exempli gratia, e.g., in the in-text note should be consistent with the DASPMAN style guidance.</p>	DASA incorporated the suggested change.
136	HQ AFTG	GM SPA.30(c)2c	<p>Revise para heading: <b>ADD/ADD and ADC appointment.</b></p>	Must not use a forward slash in place of a conjunction.	DASA incorporated the suggested change.
137	HQ AFTG	GM SPA.30(c)2c	Remove the space after the em dash.	The em dash in the main paragraph in para r, ... ADD is vital to a complex Air Display—they are responsible to the ..., is an appropriate use of an em dash; however, that usage is not involve a space.	DASA removed the space following the em dash.



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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
138	HQ AFTG	GM SPA.30(c)2c.i v	Revise: providing for pre – (and when relevant and feasible, post –) Air Display briefings	Using 'for' negates the need to use 'provision' at the end of the sentence.  When (time) rather than where (location) is more likely the conditional nature for briefing.  Hyphenating 'pre –' and 'post –' using a spaced en dash is necessary to link pre and post to the related compound noun 'Air Display'. Pre and post would be hyphenated 'pre-' and 'post-' but for the use of a compound noun. A spaced en dash is used to link a prefix or suffix, or a related word, to a compound noun, eg: a. pre – Air Display b. post – Air Display c. pre – or post – Air Display c. Air Display – related.	DASA incorporated the suggested change.
139	HQ AFTG	GM SPA.30(c)2c.v i	Revise: coordinating and controlling—, and ensuring the safety control discipline of (eg Display Line maintenance) <del>of—</del> , all Display Sequences	Inappropriate use of en dashes, replaced with commas.	DASA incorporated the suggested change.
140	HQ AFTG	GM SPA.30(c)2c.v ii(b)	Delete full stop at the end of GM SPA.30(a)2, para r.vii(b).	Full stop only at the last sentence of all subparagraphs under para r, which is para r.ix.	DASA incorporated the suggested change.
141	HQ AFTG	GM SPA.30(c)2d	Replace 'MAO-AMs' with 'MAOs'.	The responsibility is not that of the MAO-AM alone.	DASA incorporated the suggested change.
142	HQ AFTG	GM SPA.30(c)2e	Replace the incorrect use of an em dash with a comma.		DASA incorporated the suggested change.
143	HQ AFTG	GM SPA.30(c)2e	Delete 'Flight' from Air Display <del>Flight</del> control	The ADC and ADC Chair may deal with control of an Air Display, but the ADC and ADC Chair are not involved in Air Display flight control.	DASA incorporated the suggested change.
144	HQ AFTG	GM SPA.30(c)2e	Revise to replace 'it' with 'the ADC': However, <del>it</del> the ADC should comprise suitably experienced ADDs from the various commands displaying at the event, and may be supplemented by ATS and civil representatives.	It is often ambiguous and the precision 'the ADC' improves immediate understanding of what 'it' is, without detracting from the GM.	DASA incorporated the suggested change.
145	HQ AFTG	SPA.30(b)1	Replace 'single service' with 'single-Service'		DASA incorporated the suggested change.
146	HQ AFTG	AMC SPA.30(b)1a	Revise: b. <del>MAO</del> MAOs' and UAS Operators' Air Display <del>approval</del> OIP should require that:	Possessive plural MAOs' for numerical and possessive consistency with UAS Operators'. Specifying 'approval OIP' is unneeded. The MAO or UAS Operator may have only one OIP for this Air Display.	DASA incorporated the suggested change.
147	HQ AFTG	AMC SPA.30(b)1a.ii	Replace where with when.	When is temporal, where is locational. A location also links to an occasion (when). When covers both time and location, whereas where is location only.	DASA incorporated the suggested change.
148	HQ AFTG	AMC SPA.30(c)3iii. a.ix(b)1	Replace 'authorised' with 'approved'.	Approval and authorisation are not interchangeable, particularly in the aviation context. The FPAP is the approval, the Flight Authorisation is the authorisation.	DASA incorporated the suggested change.
149	HQ AFTG	GM SPA.30(b)1a.i	the 'Authority to Conduct' IAW <del>AC-SI(OPS) 03-08 or single service equivalent</del> single-Service policy <del>considering reputation, finance and legal aspects</del>	Unneeded use of a single-Service example. DASA's role is aviation safety. Prescribing requirements outside of the aviation safety scope is not within DASA's remit.	DASA incorporated the suggested change.
150	HQ AFTG	GM SPA.30(b)1a.ii	the <del>Air Tasking single-Service task Order (or single service equivalent)</del>		DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
151	HQ AFTG	GM SPA.30(b)1a.ii	the approval of the flight profile, airspace coordination measures, risk assessment and the required public affairs support to generate community awareness of the profile IAW <del>single-Service policy AC SI (OPS) 03-08 or single-service equivalent</del>		DASA incorporated the suggested change.
152	HQ AFTG	GM SPA.30(b)1c	Add 'within that flight' to end the paragraph.		DASA incorporated the suggested change.
153	HQ AFTG	GM SPA.30(b)1c	Replace: The MAO should consider whether the activity constitutes a 'Flying Display' and require all of the associated risk controls if manoeuvres or formation changes to reposition for subsequent Flypasts are conducted in proximity to and in full view of Spectators. The intent is to prevent a liberal interpretation of the definition of Flypast from alleviating the requirement for appropriate Flying Display risk controls, which are lessons learnt from the 2005 Roulettes accident and the 2019 C-130J near-CFIT incident.	An example here is the Roulettes Shrine of Remembrance Flypast in Melbourne where flypast from two directions in a relatively short time interval are requested. The manoeuvring to rearrange the formation is benign but could be construed as a display within sight of the crowd. However, being an occasion of remembrance, display flying would never be approved. Incorrect use of an em dash. Fact check required for the 2005 Roulettes accident. I don't recall depreciation of the manoeuvres being flown a dimension to the design of the display manoeuvres, and the specific crash-manoeuve in particular was certainly incorporated in to the display and definitely nothing like a flypast, in the 2005 Roulettes accident. The link between the 'liberal interpretation of flypast' and the application of risk controls to a flying display is not clear in citing the Roulettes 2005 accident. Roulettes vide <a href="https://www.airforce.gov.au/community/event-participation/air-force-roulettes">https://www.airforce.gov.au/community/event-participation/air-force-roulettes</a>	DASA incorporated the suggested change.
154	HQ AFTG	GM SPA.30(c)3iii.a	Revise: MAOs and UAS Operators should ensure that Crew and DFS (and <del>ADEO and ADD when applicable where applicable ADEO/ADD</del> ) conduct briefings (and <del>debriefs when where</del> relevant and feasible <del>debriefs</del> ) for all Air Displays.  After revisions: MAOs and UAS Operators should ensure that Crew and DFS (and ADEO and ADD when applicable) conduct briefings (and debriefs when relevant and feasible) for all Air Displays.	Active sentence structure in the parenthetical clauses. Correcting incorrect use of a forward slash. When (time) is more likely the conditional limit rather than where (location) a conditional limit for the conduct of briefings and debriefings.	DASA incorporated the suggested change.
155	HQ AFTG	AMC SPA.30(b)2a.i	Replace i. <b>Aircraft limitations.</b> MAOs and UAS Operators should ensure that, during Air Displays: (a) Aircraft are not operated with: 1. an engine deliberately shut down 2. live weapons (b) Aircraft weapons circuit-breakers and switches are in a 'safe' condition (except for flare systems when dispensing flares is incorporated into the Air Display).	Correcting incorrect use of a forwards slash. Weapons circuit breakers and switches is the name of a systems controls, wherein 'weapons' is the adjective, not possessive plural weapons' circuit breakers and switches.	DASA incorporated the suggested change.
156	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
157	HQ AFTG	AMC SPA.30(b)2a.ii i AMC SPA.30(c)3iii. a.ii	<p>Revise:</p> <p>iii. <b>Speed limitations.</b> Aircraft speed during Air Displays should not <del>exceed</del>: (a) <del>exceed</del> Mach 0.90 or 600 KIAS, whichever is least, <del>and the Crew should reduce speed further before initiating any manoeuvre</del>, so as to avoid accidental generation of a sonic disturbance. <del>(Aircraft flying at, or approaching this limit, should reduce speed further before initiating any manoeuvre to avoid in inadvertent sonic disturbances)</del> (b) <del>300 KIAS, or be such speed</del> or <del>operate</del> at high power settings to cause alarm, when approaching the Display Area from the rear of the crowd during Display Flying.</p> <p>After revisions:</p> <p>iii. <b>Speed limitations.</b> Aircraft speed during Air Displays should not: (a) exceed Mach 0.90 or 600 KIAS, whichever is least, and the Crew should reduce speed further before initiating any manoeuvre, so as to avoid accidental generation of a sonic disturbance (b) be such speed or at high power settings to cause alarm, when approaching the Display Area from the rear of the crowd during Display Flying.</p>	<p>Rearranging para iii simplifies and improves readability. Whilst 300 KIAS is currently in the AC SI, this speed is not equivalent for all aircraft types and a limiting value is not the role for DASA to prescribe. Therefore, the AMC needs to state the rationale and intent. eg 'should not operate at high speed or high power settings when..... to avoid potential alarm.'</p>	<p>DASA incorporated the suggested change to para (a). However, DASA did not incorporate the suggested change to para (b). Instead, DASA increased the speed in para (b) to 350 KIAS.</p> <p>Rationale: A defined speed of 350 KIAS prevents a liberal interpretation of the term 'such a speed' whilst providing necessary margins on the minimum speeds for manoeuvres typically flown immediately following a Crowd rear arrival. Additionally, CASA do not permit approaching the Display Area from the rear of the crowd during Air Displays. DASA only allows a Crowd rear arrival under strict controls. A speed limitation is one such control.</p>
158	HQ AFTG	AMC SPA.30(b)2a.i v AMC SPA.30(c)3iii. a.iii	<p><b>Height limitations.</b> Aircraft height during Air Displays should not be less than: (a) for fixed-wing Aircraft: 1. <b>Display Flying</b> may be performed ... 2. <b>Flypasts</b> may be flown ... 3. <b>Spinning</b> recovery to erect flight ... (b) for rotary-wing Aircraft: 1. <b>Display manoeuvre</b> (eg wingovers, pedal turns) may be performed ... 2. <b>Low speed handling manoeuvres</b> may be performed ... 3. <b>Low level runs or Flypasts</b> may be flown ... ... (c) for all Aircraft when dispensing flares, heights specified in AAP 7039.001-1 – Air Force Explosive Ordnance Operations Manual.</p>	<p>Sentences subordinate to an incomplete sentence cannot be complete sentences. None of para b.iv(a)1, 2 or 3, nor para b.iv(b)1, 2 or 3, is the final sentence in the list under para b.iv. Para b.iv(c) is the last sentence under para b.iv. As a result, para b.iv subordinate sentences cannot use paragraph headings; however, bolding for emphasis in the leading words of the sentences is permitted.</p>	<p>DASA incorporated the suggested change.</p>
159	HQ AFTG	DASR SPA.30 (General)	<p>Remove all full stops in a list of incomplete sentences between the stem sentence in para b.iv to the end of the sentence in para b.iv.c.</p>	<p>Sentences subordinate to an incomplete sentence (stem sentence in para b.iv) cannot be complete sentences. None of para b.iv(a)1, 2 or 3, nor para b.iv(b)1, 2 or 3, is the final sentence in the list under para b.iv. Para b.iv(c) is the last sentence under para b.iv</p>	<p>DASA incorporated the suggested change.</p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
160	HQ AFTG	AMC SPA.30(c)3iii. a.v(c)	<p>Should not be released without change. Flypasts and non aerobatic manoeuvres are currently approved to 200ft HAOW 600m. I believe the inclusion of MSD has made the section unnecessarily restrictive. Recommend allow 200ft HAOW still without requirement for a dedicated survey as per SPA 20.</p> <p>DASA SPA20 specifically require a flight to conduct a survey. This means completion of items that can't reliably be conducted for displays outside of the local area without a prior flight which often isn't possible. However, a detailed plan including understanding of obstacle locations from other sources, discussion with people on the ground and display area photos can achieve a reliable understanding of obstacles when combined with the high SA already deemed as necessary for a display pilot. Allowing aerobatics to 500ft without a survey whilst not allowing non aerobatic flight below this below this height when LF can be conducted to 250ft without the detailed planning applied to display flying seems excessive. The requirement for a site survey will add a significant resource burden on aircraft assets to achieve the same outcome currently being achieved without any significant change in risk.</p> <p>I agree that appropriate review of obstacles should be conducted before operating to 200ft MSD but when operating to 200ft HAOW 600m this is significantly less necessary.</p> <p>As per previous feedback, recommend the HAOW distance is not defined at DASR level and instead defined at AC or MAO level to allow appropriate oversight and review when specific display venues make this appropriate. This also allows for aircraft type, performance and crewing to be considered.</p>		<p>MAO and UAS Operators may conduct a Flypast at 200 feet HAOW 600m or 250 feet HAOW 600 m for non-aerobatic Display Flying outside a Display Box (ie without requiring a survey) (LSN 162 refers). However, the Display Crew should still conduct SRM of Display Area and Flypast route threats.</p> <p>Further, DASA amended the definition of Display Box (LSN 69 refers) to clarify that the Display Box need not be surveyed as per the requirements for a Surveyed Area (ie flown in VMC by day to identify and record hazards and obstacles). Rather, the ground area footprint of the Display Box should be thoroughly investigated pre-flight to identify and locate all hazardous obstructions.</p> <p>However, DASA does not support removing prescription of minimum HAOW and MSD from DASR—as the MSD and HAOW distances DASA have included are based on best Defence aviation practice (controls already implemented by AFTG and ACG) in high performance Aircraft. Further, prescribing such minimum HAOW and MSD is consistent with best practice regulators (eg UK MAA). Further still, nothing in DASR SPA.30 precludes AC, a MAO or UAS operator from imposing more restrictive MSD or HAOW requirements for, say, a large transport Aircraft.</p>
161	HQ AFTG	AMC SPA.30(c)3iii. a.v	Correct incorrect use of forward slash in place of a conjunction; correct the presentation of measurements (eg 1000 ft, 100 m).	<p>Must not use a forward slash in place of a conjunction.</p> <p>Measurements are written (quantity)(non-breaking space)(unit of measurement) IAW the <i>National Measurement Act 1960</i>.</p>	LSN 114 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
162	HQ AFTG	AMC SPA.30(c)3iii. a.v	(a) for fixed-wing Aircraft: 1. Display Flying. Display Flying may be performed down to 500 feet HAOW 600m outside a Display Box or over an unsurveyed location; or 200 feet Minimum Separation Distance (MSD) for non-aerobatic Display Flying conducted in a Display Box or at a location surveyed for low-level operations. 2. Flypasts. Flypasts may be flown not below 500 feet HAOW 600 m outside a Display Box or over an unsurveyed location; or 200 feet MSD in a Display Box or at a location surveyed for low-level operations 3. Spinning. Recovery to erect flight from spinning should be completed by 1 000 feet HAOW 600 m.	Flypasts and non-aerobatic manoeuvres (ie flypast and handling display) are approved to not below 200 ft HAOW 600 m. The inclusion of MSD has made the policy unnecessarily restrictive.  An appropriate review of obstacles should be conducted before operating to 200 ft HAOW any lateral distance and the review is akin to that for an unsurveyed flying route. DASA SPA.20 (low flying) specifically requires the conduct of a survey for flight for lower vertical height and permits flight to MSD. This requires completion of items that can't reliably be conducted for displays outside of the local area without a prior flight, which often isn't possible. However, a detailed plan, including understanding of obstacle locations from all available sources, discussion with people on the ground, and review of display area imagery can achieve a reliable understanding of obstacles. That obstacles and hazards 'desktop' when combined with the high SA already deemed as necessary for a display pilot is appropriate risk management. Allowing aerobatics to 500 ft without a survey, whilst not permitting non-aerobatic flight below 500 ft, and when low flying can be conducted to 250 ft HAOW 600 m, without the detailed planning is incongruous and, therefore, poor policy. The requirement for a site survey, as a further prescription over a site obstacles and hazards review described above, is a disproportionate resource burden without a logical rationale.  As per previous feedback, the lateral distance (HAOW) is not appropriate to be defined in DASR and instead defined at Environment Command or MAO level to allow appropriate application of risk management to determine a lesser lateral distance when specific display venues make this appropriate, and for which a Command Clearance will be otherwise applied if defined in DASR. This also allows for aircraft type, performance and crewing to be considered.	The inclusion of MSD enables MAOs and UAS Operators to reduce lateral separation distance for Flypasts in a Display Box (ie where the Display Crew have thoroughly investigated the Display Box to identify and locate all hazardous obstructions; and the Display Box is as clear as possible of Spectators and Secondary Spectators and hazardous obstructions). Further, defining lateral safety distances in DASR are a Hazard control and is consistent with best practice regulators (eg UK MAA).  However, DASA has restructured SPA.30, separating Flypast and Display Flying controls into sub-parts. The revised height limitations for fixed-wing Aircraft Flypasts have been amended as follows:  <i>Aircraft height should:</i> <i>(a) for fixed-wing Aircraft, be not less than:</i> <i>1. 200 feet MSD for a Flypast conducted in a Display Box or at a location surveyed for low-level operations</i> <i>2. 200 feet HAOW 600 m for a Flypast conducted outside a Display Box or at an unsurveyed location</i>  The revised height limitations for fixed-wing Aircraft Display Flying have been amended as follows:  <i>Aircraft height should:</i> <i>(a) for fixed-wing Aircraft, be not less than:</i> <i>1. 500 feet HAOW 600 m where Display Flying includes aerobatic manoeuvres</i> <i>2. 200 feet MSD for non-aerobatic Display Flying conducted in a Display Box or at a location surveyed for low-level operations</i> <i>3. 200 feet HAOW 600 m for non-aerobatic Display Flying conducted outside a Display Box or at an unsurveyed location</i> <i>4. 1000 feet HAOW 600 m for recovery to erect flight following spinning</i>
163	HQ AFTG	AMC SPA.30(c)3iii. a.v(b)	(b) for rotary-wing Aircraft: 1. Display manoeuvres. Display manoeuvres (eg wingovers/pedal turns) may be performed down to a minimum of 100 feet HAOW 100m. 2. Low speed handling manoeuvres. Low speed handling manoeuvres may be performed down to a minimum of 50 feet MSD except for live winching demonstrations which may be conducted at a height that provides the maximum degree of safety for the wireman (person being winched). 3. Flypasts. Low level runs or Flypasts may be flown to a minimum of 100 feet MSD.	Review for the same concerns as cited in AMC SPA.30(a)3i.b, para b.iv(a)	LSN 160 and 162 refers.
164	HQ AFTG	AMC SPA.30(b)2a.i v	Is AAP 7039.001-1—Air Force Explosive Ordnance Operations Manual a Defence-wide policy or Air Force only policy?	Must not prescribe policy applying only to a single Service if indeed the AAP applies only to Air Force.	DASA has removed the reference to AAP 7039.001-1— <i>Air Force Explosive Ordnance Operations Manual</i> in AMC, replacing the reference with the following:  <i>(d) for all Aircraft when dispensing flares, 2000 feet AGL over land and 500 feet over open water, except that MAO-AMs and UAS Operators should increase these heights using SRM, when thrust flares (eg MJU-57) are employed.</i>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
165	HQ AFTG	AMC SPA.30(c)3iii. a.iv	Change paragraph heading to <b>Manoeuvres over Spectator areas.</b>	Para b.v is about manoeuvring over spectator areas; whereas para vi is about safe distance from Spectators.	DASA incorporated the suggested change. However, the para heading was changed to 'Avoiding Spectator and Secondary Spectator areas' to align with the stem sentence.
166	HQ AFTG	AMC SPA.30(c)3iii. a.v	Add para heading: <b>Safe distances from Spectators.</b>	Para b.vi is about safe distances from Spectators. Para v is about manoeuvres over Spectator areas.	DASA incorporated the suggested change.
167	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
168	HQ AFTG	AMC SPA.30(c)3iii. a.v(a)	Replace the em dash with a semicolon	Inappropriate use of an em dash.	DASA incorporated the suggested change.
169	HQ AFTG	AMC SPA.30(c)3iii. a.v(a)	Should not be released without change. This is too specific and as per previous feedback should include the word 'significant'.	See previous CFS feedback in BP44020045 and outcome from meeting with CFS. SQNLDR Lachlan Hazeldine POC.	DASA reworded AMC as follows:  <i>however the MAO should increase the distance using SRM when Aircraft are at a speed in excess of 300 KIAS, and have a significant vector towards the Crowd Line.</i>
170	HQ AFTG	AMC SPA.30(c)3iii. a.v(b)	Replace semicolon with a comma.	Incorrect use of a semicolon	DASA incorporated the suggested change.
171	HQ AFTG	AMC SPA.30(c)3iii. a.vi	Replace: 4. notwithstanding the foregoing, the MAO should conduct further risk analysis during Air Display planning and execution: A. regarding the location of people, and fragile objects such as marquees and advertising hoarding, that are closer than the Crowd Line, to ensure personal safety is not compromised B. that accounts for rotor downwash effects, which will vary with channelling or funnelling objects (eg buildings, concrete barriers etc), and may require increasing the minimum distance based on the channelling or funnelling object	Sentences subordinate to an incomplete sentence cannot be complete sentences.	LSN 172 refers.
172	HQ AFTG	AMC SPA.30(c)3iii. a.vi	Para b.vii is either:  a. para vi(b)5 and subordinate paras vi(b)5A and B  b. an intext note to para vi(b), ie:  <i>(b) for crewed rotary-wing Aircraft:2</i>  <i>2. Lateral safety distances for crewed rotary-wing Aircraft:</i> <i>a. are based on a medium wake turbulence category Aircraft (as defined in ADF FLIP), and should be increased using SRM, for heavy wake turbulence category Aircraft</i> <i>b. should be increased downwind by an additional 20 m per 10 knots of wind during take-off, landing and transitional manoeuvres (S-70B-2 N24-006 (875) Rotor Downwash Incident [AB23962744] and DSTO Rotor Downwash Modelling [AB26272152 ] refer).</i>	Para b.vii is lateral safety distance content that is the subject in para b.vi, and rotary wing lateral distance is the subject in para b.vi(b). Hence para b.vii is not a separate paragraph but an element in the foregoing paras.	DASA amended AMC SPA.30(a)3i.b.vii(b).4 and AMC SPA.30(a)3i.b.vii and viii as follows:  <i>vi. Notwithstanding the foregoing, MAOs and UAS Operators should:</i> <i>(a) increase lateral safety distance downwind by an additional 20 m per 10 knots of wind during take-off, landing and transitional manoeuvres</i> <i>(b) conduct further Hazard analysis of rotor downwash and outwash effect and increase lateral safety distance using SRM:</i> <i>1. where officials or fragile objects (eg marquees, advertising hoarding), are closer than the Crowd Line</i> <i>2. channelling or funnelling objects (eg buildings, concrete barriers) are likely to direct or accelerate the outwash</i> <i>3. for heavy wake turbulence category Aircraft (as defined in ADF FLIP).<sup>2</sup> Lateral safety distance for crewed rotary-wing Aircraft is based on a medium wake turbulence category Aircraft.</i>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
173	HQ AFTG	AMC SPA.30(c)3iii. a.iv	Where is separation from Secondary Spectators considered?		LSN 48 and 175 refers.
174	HQ AFTG	AMC SPA.30(c)3iii. a.vi(b)3	Revise: ( <del>DDAAFS/OUT/2015</del> /AB23962744)	The file reference is not useful to find the document in Objective ID AB23962744: the Objective ID is all that is needed.	DASA incorporated the suggested change.
175	HQ AFTG	AMC SPA.30(c)3iii. a.iv	The Display Crew must plan the Display Line to provide the minimum lateral separation from Spectators and foreseeable Secondary Spectators (eg if there is a public road that passes next to the display venue boundary then that is a likely location for Secondary Spectators). The MAO OIP must include guidance to Display Crews that, if on approaching the Display Area, the Display Crew identify that there are Spectators infringing the minimum lateral separation from the Display Line, then the Display Crew must either not commence, or discontinue the Air Display. The MAO OIP should emphasise that Display Crews should not weigh observation of Spectators and consideration of this decision to the detriment of good airmanship. That is, the Display Crew should not unduly divert their attention from achieving/assessing entry gates/height/speed, G-awareness, formation leadership, correct technique, making weather decisions, ensuring de-confliction, fuel awareness, etc—to assess the Spectators' position. However, if on approach to a display it becomes obvious to the Display Crew that the separation with Spectators is compromised, then the Display Crew must 'knock it off'.	See previous CFS feedback in BP44020045 re separation from Secondary Spectators; SQNLDR Lachlan Hazeldine POC.	DASA amended AMC SPA.30(a)3ib.b.ix as per LSN 48.
176	HQ AFTG	AMC SPA.30(c)3iii. a.viii GM SPA.30(c)3iii.i	(b) if the Display Area is in an airspace reservation or a restricted area as defined in ADF FLIP (which may include a TRA) that excludes all other non-participating Aircraft. Participating Aircraft may hold in, or depart or recover through, the Display Area provided:	See previous CFS feedback in BP44020045; SQNLDR Lachlan Hazeldine POC. Currently TRA requirements for PC-21 are where deemed appropriate with alternative means used to support traffic awareness. A number of recent traffic conflicts have occurred within restricted airspace or TRA.	DASA amended AMC SPA.30(a)3i.b.x(b) as follows:  <b>Airspace Segregation.</b> MAOs and UAS Operators should ensure Segregation is established in the Display Area.  Additionally, DASA added the following GM:  <b>Airspace Segregation.</b> Ideally, Segregation should exclude all other non-participating Aircraft from the Display Area. For example, MAOs and UAS Operators should consider establishing an airspace reservation or temporary restricted area (TRA). However, if this is not reasonably practicable, MAOs and UAS Operators should: a. employ ATS, ASM or ATFM to ensure there is deconfliction between displaying Aircraft and all other Aircraft in the Display Area b. raise a NOTAM and inform all regular airspace users of the Air Display.  Further, DASA amended GM SPA.30(a)2d.ii as follows:  ii. Segregation arrangements

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
177	HQ AFTG	AMC SPA.30(c)3iii. a.x	Revise: <b>Rehearsals.</b> Display Crew should rehearse the Standard <a href="#">Display Sequence</a> , Alternate <a href="#">Alternative Display Sequence</a> , and Special Venue Display <a href="#">SequenceSequences</a> . Display Flying rehearsals should:	Defined terms must not be truncated.  Suggest remove special venue reference <a href="#">SQNLDR Lachlan Hazeldine CFS POC</a> .	DASA incorporated the suggested change.
178	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
179	HQ AFTG	GM SPA.30(c)3iii. a	Incorrect uses of forward slash, em dash and capitalisation. 'Written' in '... the Written Air Display instructions ...' is a common noun, hence lowercase.		DASA incorporated the suggestion rewording, amending GM as follows:  <i>The ADEO and ADD should supplement the written Air Display instructions with a verbal briefing on the day of the Air Display.</i>
180	HQ AFTG	N/A	Hazardous substances is the WHS Act term (not defined), and hazardous chemical is the WHS Regulations term. HAZMAT is not a recognised term in the WHS framework. However, HAZMAT is an authorised term in the <i>Australian Defence Glossary</i> . Nevertheless, the terms IAW the WHS Act should be used.		DASA retained 'HAZMAT'. Regulatory Style Guide convention is that DASR refer to terms defined in the <i>Australian Defence Glossary</i> or the <i>DASPMAN Glossary</i> or define new terms. HAZMAT is an authorised term in the <i>Australian Defence Glossary</i> . While referring to the WHS Act and WHS Regulations is technically correct, DASRs filters these requirements to fit the Defence context.
181	HQ AFTG	GM SPA.30(c)3iii. c	Replace 'Display Line/s' with 'Display Lines'.	Incorrect use of a forward slash, optional plurals are often not required and often grammatically incorrect in the associated sentence, and the context is plural 'Display Lines' not singular 'Display Line'.	DASA incorporated the suggested change.
182	HQ AFTG	GM SPA.30(c)3iii.f	Replace 'and/or' with 'or'.	Must not use and/or in government writing, and or is the correct content, because either condition creates the condition requiring consideration.	DASA incorporated the suggested change.
183	HQ AFTG	GM SPA.30(c)3iii. d	Revise: MAOs and UAS Operators should consider the likelihood of Secondary Spectators <del>and third parties</del> gathering outside the designated Spectator Areas, — and any effect the Air Display might have on members of the public in the vicinity.	The scope of 'third parties' is already within the definition of 'Secondary Spectators'. Incorrect use of an em dash, replaced with a comma.	DASA incorporated the suggested change.
184	HQ AFTG	GM SPA.30(c)3iii. c	Incorrect use of a forward slash in place of a conjunction, and aerodromes not airfields are where Defence aircraft will be doing air displays.		DASA replaced the '/' with 'or'.
185	HQ AFTG	GM SPA.30(c)3iii. g	Incorrect use of a forward slashes in place of a conjunctions.		DASA replaced the '/' with ', '.
186	HQ AFTG	GM SPA.30(c)3iii. e	The 'high-risk areas' in relation to consideration of secondary spectators (inclusive of other persons) could be applied effectively to previous references. For Roulettes for instance a large emphasis is placed on the risk of concentrations of secondary spectators in vicinity of the likely debris areas for the Roulettes Wheel and Heart manoeuvres.	SQNLDR Lachlan Hazeldine CFS POC	LSN 48 refers.
187	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.



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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
188	HQ AFTG	AMC SPA.30(c)3ii.a .i	Revise: approved Air Display manoeuvres and Standard Display Sequence, <del>Alternate</del> Alternative Display Sequence and Special Venue Display Sequence Sequences specific to Aircraft Type	Must not truncate defined terms.	DASA incorporated the suggested change.
189	HQ AFTG	SPA.30(c)3i	Handling notes is a common noun because handling notes is not a DASPMAN defined term		DASA incorporated the suggestion.
190	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
191	HQ AFTG	GM SPA.30(c)3ii.c	Replace: <b>Approved manoeuvres and sequences.</b> Air Display risk and Display Crew workload increases if Display Sequences are modified while mid-display. Display Crew should not make significant modifications to the Display Sequence airborne (eg changing entry gates for manoeuvres, or adding or substituting manoeuvres). However, Display Crews should make standard adjustments for wind. For example, adjusting the timing of pitch up for vertical manoeuvres; switching Cuban eights and lazy eights for reversal manoeuvres with wind along the Display Line; small angle of bank during looping manoeuvres to compensate for wind across the Display Line. Display Crew rehearsal of the standard manoeuvres and approved Display Sequences offers the following advantages:	The original is too long and contains multiple parenthetical phrases, and parenthetical phrases within parenthetical phrases.	DASA incorporated the suggested change.
192	HQ AFTG	GM SPA.30(c)3ii.d	Replace: <del>The Display Crew must seek MAO-AM (or delegate) approval to fly any bespoke Display Sequence (eg CO-CFS approves Display Sequences for graduates of the PC-21 low level aerobatics course in CFS, documented in a Minute or decision brief).</del>  with: The Display Crew must seek approval IAW MAO procedures to fly any bespoke Display Sequence.	The original is both too specific, and worded inconsistently with the role of the MAO: all MAOs are required to have procedures.	DASA amended GM SPA.30(a)3ii.c as follows:  <i>c. <b>Standard Display Sequence.</b> The term 'Standard Display Sequence' does not imply that all Display Crew in any particular MAO must only fly the same sequence. In developing well rounded Crew, it is a useful exercise (as part of their Crew training) to design and develop a bespoke Display Sequence—consistent with the MAO's or UAS Operator's OIP and this regulation.</i>
193	HQ AFTG	DASR SPA.30 (General)	Lowercase 'notes' in the 'Handling notes' heading.  Plural possessive MAOs' required.	Handling notes is a common noun because handling notes is not a DASPMAN defined term, and only the first word and proper nouns are capitalised in headings.  Plural possessive MAOs' is required for consistency with plural possessive UAS Operators'.	DASA incorporated the suggestion.
194	HQ AFTG	GM SPA.30(c)3ii.c	Is the reference 'Table 1' meant to be 'Table GM SPA.30(a)3ii – 1' or is the table caption meant to be 'Table 1'? Table GM SPA.30(a)3ii – 1 is difficult to identify that is a table caption and the caption simply should be 'Table 1'.	In text references must be consistent with the table caption.	LSN 195 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
195	HQ AFTG	GM SPA.30(c)3i.c	<p>Is this meant to be 'Table 1' or is the in-text reference meant to be 'Table GM SPA.30(a)3ii – 1'? 'Table GM SPA.30(a)3ii – 1' is difficult to identify that is a table caption and the caption simply should be 'Table 1'.</p> <p>The DASR Interim Style Guide V1.1, of 06 Aug 21 (BP18335994) does not prescribe to where table captions are placed—above or below the table. The government style manual does not prescribe where to place captions, but the <i>Australian Defence Force Writing Manual</i> prescribes vide para 6.109: <i>For figures, locate the identifier centrally below the inserted matter; for tables, place it centrally above the inserted matter.</i></p> <p>Noting the DASPMAN is a Defence Manual, the Defence Manual Template User Guide <a href="http://intranet.defence.gov.au/home/document/s/templates/data/Manual_template_user_guide.pdf">http://intranet.defence.gov.au/home/document/s/templates/data/Manual_template_user_guide.pdf</a>, and the Publication or Manual Template <a href="http://intranet.defence.gov.au/home/document/s/templates/data/docm/manual.docm">http://intranet.defence.gov.au/home/document/s/templates/data/docm/manual.docm</a>, prescribes table captions go above the table.</p>	Compliance with prescribed documentary standards.	DASA moved the table identifier to centrally above the Table and retained the reference as 'Table GM SPA.30(a)3ii-1 - Safety calls' which is the DASR referencing convention.
196	HQ AFTG	GM SPA.30(c)3i.c	Inconsistent and incorrect use of capitalisation: only the first word and proper nouns are capitalised.		DASA removed incorrect use of capitalisation.
197	HQ AFTG	GM SPA.30(c)3i.d	Inconsistent and incorrect use of capitalisation: only the first word and proper nouns are capitalised.		DASA removed incorrect use of capitalisation.
198	HQ AFTG	GM SPA.30(c)3i.e. i	Vide the NPA 2023-010 DASR SMS review feedback, ASR are a subset of <i>Occurrence Report</i> , and the reference to ASR should be 'Occurrence Report' and not the specific ASR.		DASA retained the term 'Aviation Safety Report'.  Rationale: While some ASR are a subset of Occurrence Reports (ie a mandatory report to DASA, typically submitted on a Form 44) not all ASR are Occurrence Reports. More so, the target audience for DASR SPA.30 is Aircrew and generally display Pilots and their supervisors. Hence, the term ASR is both more precise and more likely to be understood by the target audience.
199	HQ AFTG	SPA.30(c)3iv	Emergency response plan is not a proper noun		DASA amended the wording to 'Emergency response plan (ERP)'.
200	HQ AFTG	AMC SPA.30(b)4a.i v	<p>Replace: <del>all flying activity in the drop area (as defined in ADFP 3.9.1 and Manual of Air Traffic Services) is to cease, except that which is necessary for dispatching parachutists</del></p> <p>with: except that which is necessary for dispatching parachutists, all flying activity in the drop area (as defined in ADFP 3.9.1 and Manual of Air Traffic Services) is to cease</p>	Whilst a less preferable sentence structure, presenting the conditional clause first, rearranging eliminates the intermediate parenthetical clause that disrupts the reading flow, for information that is not essential but nevertheless meaningful in the AMC.	DASA incorporated the suggested change.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
201	HQ AFTG	AMC SPA.30(b)4a.i v	Replace: <del>propellers and rotors of Aircraft in the drop area, excluding those of the drop Aircraft, are not turning.</del>  with: excluding those of the drop Aircraft, propellers and rotors of Aircraft in the drop area are not turning.	Deleting the incorrect use of a full stop in an intermediate sentence within a list of incomplete sentences. Grammar.	DASA incorporated the suggested change.
202	HQ AFTG	AMC SPA.30(b)4a.ii	Revise: ensure <del>that objects</del> the object(s)	Grammar and eliminates optional plural.	DASA incorporated the suggested change.
203	HQ AFTG	AMC SPA.30(b)4a	Is AAP 7039.001-1—Air Force Explosive Ordinance Operations Manual a Defence-wide policy or Air Force only policy?	Must not prescribe policy applying only to a single Service if indeed the AAP applies only to Air Force.	DASA removed the reference to AAP 7039.001-1— <i>Air Force Explosive Ordinance Operations Manual</i> .
204	HQ AFTG	AMC SPA.30(b)4a.v i(a)	Delete 'third parties.'	Secondary Spectators already defines 'third parties'.	DASA incorporated the suggested change.
205	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
206	HQ AFTG	AMC SPA.30(b)4a.i v(a)	Delete 'drop area'.	Drop area is not mentioned in ADFP 3.9.1, only drop zone, and drop area is not in the Australian Defence Glossary. Document search identified one use of drop area relating to parachute operations in CASA EX104/22; however, all other identified CASA usages of drop area relate to banner towing. Eliminates incorrect use of a forward slash	DASA incorporated the suggested change.
207	HQ AFTG	AMC SPA.30(b)4a	Is AAP 7039.001-1—Air Force Explosive Ordinance Operations Manual a Defence-wide policy or Air Force only policy?	Must not prescribe policy applying only to a single Service if indeed the AAP applies only to Air Force.	DASA deleted para GM SPA.30(a)3iii.b (renumbering the remainder of GM SPA.30(a)3iii accordingly).
208	HQ AFTG	AMC SPA.30(b)4a.v i(a)	replace 'third parties' with 'Secondary Spectators'.	Defined term.	DASA incorporated the suggested change.
209	HQ AFTG	AMC SPA.30(b)4a	Is AAP 7039.001-1—Air Force Explosive Ordinance Operations Manual a Defence-wide policy or Air Force only policy?	Must not prescribe policy applying only to a single Service if indeed the AAP applies only to Air Force.	DASA removed the words 'in addition to the mitigations in AAP 7039.001-1— <i>Air Force Explosive Ordinance Operations Manual</i> '
210	HQ AFTG	N/A	Handling demonstration is not a DASPMAN defined term and therefore not a proper noun. Also, what is a handling demonstration? Apart from the invisible 'Handling Demonstration' cited adjacent to the SPA.30 header, this is the first and only mention of handling demonstration in SPA.30 and is undefined.		DASA removed the words 'or Handling Demonstration'.
211	HQ AFTG	GM SPA.30(b)4d.ii i	Replace the em dash with a comma	Incorrect use of a em dash.	DASA incorporated the suggested change.
212	HQ AFTG	DASR SPA.30 (General)	All mentions of 'Crew' need to be 'Display Crew'.		LSN 83 refers.
213	ACG	GM SPA.30d.i	Change 'Flying Display Supervisor (FDD)' to 'Flying Display Supervisor (FDS)' or 'Flying Display Director (FDD)'.	Using FDD to abbreviate Flying Display Supervisor is incorrect.  The Air Shows Team Homepage includes both Flying Display Directors (FDD/'Ringmasters') and Flying Display Supervisors (FDS).  <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a>	DASA replaced 'Air Display Director' with 'Flying Display Director' and all instances of 'ADD' with 'FDD'.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
214	ACG	AMC SPA.30(c)2 GM SPA.30(c)1i.a GM SPA.30(c)2c	<p>1. ACG consider it is not appropriate to leverage ADD requirements on the MAO.</p> <p>Remove ADD: i. select Crew, FLTAUTHO, <del>ADD</del> and DFS based on their skill and experience.</p> <p>2. Complex Air Displays involve multiple MAOs, not one MAO as per the GM.</p> <p>GM SPA.30(a)2.r states:  ADD/ADC appointment. AFHQ AST are the ADF lead for the provision of ADD. The role of the ADD is vital to a complex Air Display— they are responsible to the MAO-AM or UAS Operator for ensuring Defence Aircraft are operating in a safe and appropriately planned Air Display environment</p>	<p>1. The AFHQ AST is responsible for providing an ADD.</p> <p>Extract from AST DPN webpage. Air Shows Team Responsible for: Assignment of FDD/FDS for Airshows, Flying Displays, Flypasts, and other events that have ADF aviation participants</p> <p>(<a href="http://dnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://dnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a>)</p>	<p>SPA.30 requires MAOs and UAS Operators (as the accountable entity) to ensure adequate controls, including appointment of ADDs, are implemented for Air Displays. However, SPA.30 does not prevent MAOs and UAS Operators from delegating responsibility for these requirements to external organisations.</p> <p>For example, MAOs and UAS Operators should ensure that candidates selected for ADD training have suitable skill and experience and are suitably Qualified. However, MAOs and UAS Operators can continue to seek support from AFHQ AST, as custodians of the Display Flying Supervisor Accreditation Course, to deliver the training. Similarly, AFHQ AST may assign an ADD to an Air Display. However, MAOs and UAS Operators should confirm a suitable ADD is in place for the relevant Air Display (when required by AMC SPA.30(c)2) before approving or authorising their Aircraft to participate in that Air Display.</p> <p>Accordingly, DASA: a. modified AMC and GM throughout to clarify MAOs and UAS Operators are to 'ensure' controls are implemented vice they are to 'define' controls b. clarified that ADD should have the same skill, experience and qualification as Crew c. added the following at GM SPA.30(c)2c:</p> <p><i>Note, in meeting the obligation to 'ensure' a suitable FDD is appointed, the MAO or UAS operator does not necessarily have to appoint the FDD. At Defence Air shows, the AFHQ AST will typically appoint the FDD. In this case, the MAO or UAS operator can meet their 'ensure' obligation by confirming that AFHQ AST (or another appropriate organisation) have appointed an FDD (eg through the MAO or UAS Operator's normal planning and FLTAUTH processes). However, if the MAO or UAS Operator is hosting a Display Flying event (independently of the AFHQ AST) that requires an FDD, then the 'ensure' obligation includes the appointment of that FDD.</i></p> <p>Rationale: DASR can only place obligations on regulated entities. AFHQ AST is not a regulated entity.</p>
215	ACG	AMC SPA.30(c)1i.b	<p>In addition to requirements in DASR ORO.30, for Display Flying, the FLTAUTHO <del>should</del> <b>would ideally hold or</b> previously have held a Display Flying qualification, <b>or received mentoring on display authorisation considerations, and is familiar with the event, display profile and specific considerations.</b></p>	<p>Provides more flexibility to MAOs when appointing a FLTAUTH. In ACG's circumstances, there is typically one display pilot/crew developed every couple of years resulting in a small pool of people (excluding postings/career changes) to ensure compliance WRT the current wording of the AMC.</p>	<p>DASA incorporated the suggested change, amending AMC as follows:</p> <p><i>ii. for FLTAUTHO, in addition to requirements in DASR ORO.30, require the candidate to either:</i> <i>(a) hold a Display Flying Competency</i> <i>(b) possess technical mastery to compensate for the lack of Display Flying experience</i></p> <p>Additionally, DASA added the following GM:</p> <p><i>d. FLTAUTH technical mastery for FLTAUTHO without Display Flying experience may be achieved through a controlled and progressive process of training and accumulated experience, including:</i> <i>i. demonstrated Competency across a spectrum of operations for the Aircraft Type</i> <i>ii. understanding the elements of the 'knowledge' component of Crew Display Flying training</i> <i>iii. appreciation of the foregoing considerations relevant to Air Displays</i></p>

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
216	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	1. ACG consider it is not appropriate to leverage ADD requirements on the MAO.  Suggested change: c. Qualification and Competency. MAOs and UAS Operators should implement Competency requirements for Display Crew <del>and ADD</del> which:  This GM states that an ADC ".....should comprise suitably experienced ADDs <del>from the various commands displaying at the event, .....</del> ".  Delete as shown above.	Extract from AST DPN webpage. Air Shows Team Responsible for: Training, certification and currency management' of ADDs, as per Air Shows Team Homepage ( <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a> )  This implies that FEGs should have an ADD within its pers structure. This is not how the appointment of an ADD works in current practice. Adds an unacceptable reg compliance burden on the MAO..	DASA has not incorporated the suggested change. However, DASA replaced the word 'However' at the beginning of the sentence with 'Ideally'.  LSN 214 refers.
217	ACG	AMC SPA.30(c)1ii.a GM SPA.30(c)1ii.a	i. reference the applicable <del>Learning Management Plan (LMP)</del> Training material	ACG have detailed Air Display training material included in OIP.  The requirement for an LMP introduces a resource burden on the ACG Training Systems Team to develop an LMP when the training material included in ACG OIP is considered an effective and efficient learning solution to address qualification and competency of ACG Display Crews.	LSN 4, 10 and 11 refer.
218	ACG	AMC SPA.30(c)1ii.a .ii(b)	Remove instructor specificity to allow MAO to establish requirements to deliver the Training Plan.	The current or previous Display Crew may be the most suitable person to deliver and supervise the Training Plan. This person may not be a QFI, OFI or FCI.	DASA retained the term Flying Instructor (as defined in the DASPMan glossary). Note, Flying Instructor does not necessarily require the individual to hold QFI/FCI/OFI. The MAO is free to define Flying Instructor qualifications—provided that it is not inconsistent with CO CFS advice (noting DASR Aircrew.10 recognises CFS as the centre of excellence for flying instruction). The purpose of this regulatory Hazard control (requiring a Flying Instructor) is to assure that the individual providing the Display Flying instruction in the airborne environment (or simulated airborne environment) has the necessary knowledge, skills and attitude (KSA) to effectively and safely deliver airborne instruction—including, inter alia, the KSA to safely monitor and intervene when necessary. (From CO CFS: The overall intent is that the Flying Instructor has the AIT KSA commensurate with the training they are authorised to deliver in the airborne or simulated airborne environment. It will require some AIT training for the Flying Instructor).
219	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADD requirements on the MAO.	Extract from AST DPN webpage.	LSN 214 refers.
220	ACG	AMC SPA.30(c)1ii.b GM SPA.30(c)1ii.f	The currency AMC is too prescriptive. ACG suggest writing the AMC such that MAOs are responsible for promulgating in OIP the currency requirements <u>appropriate to their platforms</u> , including the use of FSTD for currency purposes.  ACG consider the use of a 500' increment introduces unintended risk for fast jet aircraft.	Extract from AST DPN webpage. Air Shows Team Responsible for: Training, certification and currency management' of ADDs, as per Air Shows Team Homepage ( <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a> )	LSN 4 refers.  Additionally, DASA added an inline note to AMC SPA.30(c)1ii.b.i(a) and (b) as follows:  <i>MAOs and UAS Operators may define Currency periods in equivalent calendar weeks or months; and may reduce periodicity</i>
221	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADD requirements on the MAO.	Extract from AST DPN webpage. Air Shows Team Responsible for: Training, certification and currency management' of ADDs, as per Air Shows Team Homepage ( <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a> )	LSN 214 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
222	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADD requirements on the MAO.  Suggested wording: i. Display Crew <del>and</del> ADD training, Competency and Currency IAW DASR AIRCREW.10(a)6	Extract from AST DPN webpage. Air Shows Team Responsible for: Training, certification and currency management' of ADDs, as per Air Shows Team Homepage ( <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a> )	LSN 214 refers.
223	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADD requirements on the MAO.	Extract from AST DPN webpage. Air Shows Team Responsible for: Assignment of FDD/FDS for Airshows, Flying Displays, Flypasts, and other events that have ADF aviation participants. ( <a href="http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx">http://drnet/raaf/AirForce/CoSAFHQ/AirShowsTeam/Pages/Home.aspx</a> )	LSN 214 refers.
224	ACG	SPA.30(b)1	a. A MAO or UAS Operator must not conduct an Air Display without approval from the relevant single service approval authority, <b>unless otherwise delegated in OIP from the relevant single service approval authority.</b>	Adding the green text will align with current Air Display approval delegations to FEGCDRs in AC SIs.	DASA has not incorporated the suggested change. This is an implicit control. DASR convention is not to specify how command approval occurs, simply that approval is required to conduct an Air Display.
225	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADD requirements on the MAO.	This isn't how it currently works in practice.	LSN 214 refers.
226	ACG	GM SPA.30(c)1i.a GM SPA.30(c)2c	ACG consider it is not appropriate to leverage ADEO and ADD requirements on the MAO.	This isn't how it currently works in practice.	LSN 214 refers.
227	ACG	AMC SPA.30(b)2iii	Amend to Mach 0.92 or 600 KIAS.	See ACG Brief (B113624625) and DASA comms (BP44040791)	DASA did not incorporate the suggested change.  Rationale: The airspeed limitations (Mach 0.9 or 600KIAS, whichever is least) are benchmarked against exemplar regulators (eg UK MAA).
228	ACG	AMC SPA.30(c)3iii. a.v(a)	This AMC is too specific. What is the intent of the 450m limit?	ACG suggest the AMC describe the limiting condition(s) such that the MAO can implement a profile that achieves the intent.	LSN 169 refers.  DASA reworded AMC as follows:  <i>however the MAO should increase the distance using SRM when Aircraft are at a speed in excess of 300 KIAS, and have a significant vector towards the Crowd Line.</i>
229	ACG	AMC SPA.30(c)3iii. a.iv	ACG consider it impractical to implement this AMC without compromising safety. Request detailed discussion with ACG A81 staff.		LSN 48 refers.  Additionally, DASA added the following note to the AMC relating to Currency periodicity:  <i>MAOs and UAS Operators should refer to AFHQ AST OIP when establishing methods for FDD to regain Currency.</i>
230	ACG	AMC SPA.30(c)3iii. c.i	ACG consider this AMC too prescriptive. ACG suggest writing the AMC such that MAOs are responsible for promulgating in OIP rehearsal requirements appropriate to their platforms, including the use of FSTD for rehearsal purposes.	ACG broadly take this AMC's approach to rehearsals but may not rehearse all alternate profiles on all occasions. The display profile executed will be governed by the rehearsals achieved and the conditions on the day.	DASA retained the AMC which are controls identified from the 2019 C-130J near-CFIT ASR. The controls provide direction to MAOs and UAS Operators, more so for those that infrequently conduct Air Displays, on requirements for Air Display rehearsals.  The AMC does not require that all Display Sequences need to be practiced for each Air Display. Nor does the AMC direct MAOs or UAS Operators to use FSTD (AMC SPA.30(a)2.d which is referenced, suggests maximising the use of FSTD).

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
231	ACG	AMC SPA.30(c)3iii.a.ii	ACG consider it is not appropriate to leverage this requirements on the MAO.	This AMC is appropriate for MOAs WRT internal cockpit comms between crews, but not appropriate for Air Displays with an external ADD. Request DASA discussion with ACG A81 staff.	DASA amended the AMC to require MAOs and UAS Operators to ensure that Display Crew and officials establish safety calls to be used during Air Displays, rather than documenting safety calls in handling notes.
232	ACG	AMC SPA.30(c)3ii.a.ii(a)	There are many variables associated with defining permissible alterations - request DASA discussion with ACG A81 staff on implementation in OIP when Display Teams are not routine in the same sense as the Roulettes.	Request DASA discussion with ACG A81 staff regarding extant ACG OIP contingencies meet the intent of the regulation.	DASA notes ACGs SRM and MRPs are acceptable. Nil amendment to regulation required.
233	ACG	GM SPA.30(c)2d	ACG consider it is not appropriate to leverage this requirements on the MAO.  GM SPA.30(a)2.r states: ADD/ADC appointment. AFHQ AST are the ADF lead for the provision of ADD. The role of the ADD is vital to a complex Air Display— they are responsible <del>to the MAO-AM or UAS Operator</del> for ensuring Defence Aircraft are operating in a safe and appropriately planned Air Display environment, including:  ii. ensuring that an appropriate ERP is in place	Flying MAOs are not responsible for the majority of ERP controls associated Air displays other than integration of the FEG Accident and Incident Response Plans with the ERP.	DASA deleted the words 'to the MAO-AM or UAS Operator'. Additionally, DASA deleted the words 'ensuring that' GM SPA.30(a)2r.ii and renumbered the sub-para as GM SPA.30(a)2r.i(c).  SPA.30 requires MAOs and UAS Operators (as the accountable entity) to ensure adequate controls, including an ERP, are implemented for Air Displays. However, MAOs and UAS Operators need not develop a discrete Air Display ERP where other ERP (eg base or unit ERP) document procedures to be followed in the event of an incident or accident at an Air Display. DASA added GM to that effect as GM SPA.30(a)3ii.f.  Accordingly, DASA incorporated words to this effect in GM.  Rationale: DASR can only place obligations on regulated entities. AFHQ AST is not a regulated entity.
234	ACG	GM SPA.30(c)2d	ACG consider it is not appropriate to leverage this requirements on the MAO.  GM SPA.30(a)2.r states: ADD/ADC appointment. AFHQ AST are the ADF lead for the provision of ADD. The role of the ADD is vital to a complex Air Display— they are responsible <del>to the MAO-AM or UAS Operator</del> for ensuring Defence Aircraft are operating in a safe and appropriately planned Air Display environment, including:  vii. controlling the Defence components of the Air Display programme, including:  (b) coordinating pyrotechnics and other ground special effects.	The MAO should not be accountable for ground effects apart from the crews understanding the MAXORD of the ground effect.	LSN 233 refers.

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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
235	AST	GM SPA.30d.i	<p>DASA conducted international and national peer reviews during the NPA development and the term ADD does align with the CASA terminology of Air Displays to cover the multitude of events featuring aircraft. However, I do note that CASA uses the term Air Coordinator (AC 91-21 ver 2.2) and the UK CAA/MAA has retained the term Flying Display Director (CAP 403).</p> <p>Suggest retaining the term Flying Display Director. ADD introduces a new term to a glossary already replete with FDD, FDS, RM etc.</p>		DASA incorporated the suggestion.
236	DASA UAS AFTG	AMC SPA.30(b)2iv	<p>Height limitations in AMC SPA.30(b)2 (and AMC.SPA.30(c)2iii) are likely too high for all UAS contexts.</p>	<p>Recommend allowing individual UAS operators to set appropriate limits scalable to the inherent risk for the operation.</p>	<p>DASA amended the extant height limitations to be applicable only to Crewed Aircraft by adding the word 'crewed' to AMC SPA.30(a)3i.b.b.iv(a). DASA-recognised CAAs and MAAs do not prescribe minimum heights for UAS operations at Air Displays or generally. However, DASA added the following paragraph as AMC SPA.30(a)3i.b.b.iv(c):</p> <p><i>ii. Height limitations. Aircraft height should:</i></p> <p>...</p> <p><i>(c) for uncrewed Aircraft, as defined by the UAS Operator using SRM, that ensures the UAS is not a hazard to other Aircraft or General Public</i></p>
237	DAVN OPS	SPA.30(c)1i	<p>Selection criteria for Display flying crew must also include:</p> <p>a. qualifications (eg for Roulettes the pre-requisite qualifications include B Cat QFI, LLAERO, FMAERO)</p> <p>b. airmanship.</p> <p>Rationale: The best hands and feet pilot in a FEG with the most hours may not be a suitable Display Flying candidate if that individual lacks the judgement to apply the safety philosophies of display flying effectively; or lacks the necessary representational qualities. Specifically, a display pilot must understand that the display must not be designed or flown to the limits of the aircraft or regulations, such that a disturbance results in an exceedance or violation. They must understand that they should not compete with the 'ice cream cornetto' for the attention of the Spectator—and that to a spectator a 5g turn on the buffet looks similar to a 4 G turn off the buffet; but the 4 G turn gives the Display pilot room for corrections so that a small disturbance does not result in a crowd line violation or an accelerated stall. Further, without selecting Display Pilots from the pool of Aircrew Instructors, the ability to safely train the next Display Pilot is curtailed.</p>		<p>DASA added 'airmanship' to the DASR Part. Additionally, DASA added the rationale from the comment as GM, titled 'Qualifications and Airmanship'.</p>



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LSN	Unit	Updated DASR Reference:	Unit: Comment or suggested change	Unit: Further Explanation where provided	DASA Response
238	DAVN OPS	N/A	Delete the second sentence in GM SPA.30(a)2j, due the lack of available references providing a benchmarking genesis to this GM.		DASA deleted the second sentence.